



The Planning Inspectorate

3/25 Hawk Wing
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

Direct Line 0117-372 8255
Switchboard 0117-372 8000
Fax No 0117-372 8804
GTN 1371-8255
e-mail: Christopher.snarr@pins.gsi.gov.uk
<http://www.planning-inspectorate.gov.uk>

Shaun Field
Chief Executive
Bedford Borough Council
Town Hall
St Paul's Square
Bedford
MK40 1SJ

Your Ref:

Our Ref: PINS/W0205/429/5

Date: 16 July 2008

Dear Mr Field,

Bedford Borough Council Town Centre Area Action Plan Development Plan Document

1 As you know, I have been appointed by the Secretary of State to carry out an independent examination of Bedford Borough Council's Town Centre Area Action Plan Development Plan Document, which was submitted to the Secretary of State on 4 July 2006, pursuant to section 20 of the Planning and Compulsory Purchase Act 2004 (the 2004 Act).

2 I held a Pre Examination Meeting on 22 June 2007 to discuss the procedural and administrative arrangements for the hearing sessions of the Examination of both the Council's Core Strategy and Rural Issues Plan and the Town Centre Area Action Plan. I conducted the Examination of the Area Action Plan by way of written exchange and by a series of hearings. Agendas for the hearing sessions were distributed by the Programme Officer on 29 January 2008. The hearing sessions were held at the Council's offices at the Town Hall, St Paul's Square, Bedford MK40 1SJ on 22, 23 and 24 April 2008.

3 The purpose of the independent examination is set out in section 20(5) of the 2004 Act. This falls into two parts: firstly, whether the submitted DPD has been prepared in accordance with certain statutory requirements under s19 & s24(1) of the 2004 Act and the associated regulations (*The Town and Country Planning (Local Development) (England) Regulations 2004; SI.2004 No. 2204*) [CD N2]; and secondly, whether the DPD is sound. In making an assessment of soundness, I have focused on the nine tests set out in paragraph 4.24 of Planning Policy Statement (PPS)12 *Local Development Frameworks* [CD N20]. I have also used the Planning Inspectorate's *Guide to the Process of Assessing the Soundness of Development Plan Documents* (PINS; December 2005) as the framework for assessing the soundness of the Core Strategy.

4 With this letter is a copy of my report on the submitted Area Action Plan



which contains my recommendations and the reasons for them as required by section 20(7) of the 2004 Act. In coming to my conclusions on the soundness of the Area Action Plan, I have considered all the representations made during the 6-week period following submission, in accordance with Regulation 29 of the 2004 Regulations, together with representations made on post-submission amendments which were proposed by your Council. These informed the identification of the Matters & Issues for Examination. During the course of the Examination and as a result of the discussions at the hearing sessions, the Council suggested a number of further minor changes to the text of the submitted Area Action Plan. I have also considered these proposed changes as part of my assessment of the soundness of the Area Action Plan. I have taken account of the subsequent written statements and oral contributions made during the course of the Examination. However, my primary task is to consider whether the document is sound. It is not a requirement of the 2004 Act that I consider or report on "objections", and consequently, my report does not list individual representations or respond to all the points made.

5 In reaching my conclusion on the submitted document I have found it necessary to recommend a number of changes. Some of the changes to which I refer were proposed by your Council whilst others arose from discussions during the Hearing sessions of the Examination. You are, of course, aware that national guidance states that changes to a document should not be made prior to the Examination. However, I am satisfied that the changes which I recommend are either relatively minor, bring the DPD's provisions up-to-date, give greater clarity to the manner in which the DPD will be operated or provide greater certainty as to the way in which the planning process for the town centre will move forward. In these circumstances, my overall conclusion is that, with the amendments recommended in my report, the Town Centre Area Action Plan satisfies the requirements of s20(5)(a) & (b) of the 2004 Act and the associated Regulations. It satisfies the tests of soundness set out in PPS12 and is, therefore, **sound**.

6 During the Examination, I was assisted by my Programme Officer, Mrs Yvonne Parker, whom I thank for her hard work and patience which ensured that the Examination process, particularly the hearing sessions, ran smoothly. All the statements, representations, documents and other material submitted during the course of the Examination, including at the hearing sessions, are contained in the Examination library. These include the Core Documents, which contain the Council's "core evidence base" for the Area Action Plan.

7 I also wish to express my thanks to Mr Bird, Mr Bailey and the Council's officer team and all those attending the hearing sessions for the pragmatic and professional manner they adopted during the hearings and throughout the Examination. I hope that my conclusions and recommendations in the accompanying report will enable the Council to adopt the Area Action Plan in an efficient manner.

Yours sincerely

Roland Punshon

Inspector



Report to Bedford Borough Council

by Roland Punshon BSc, MRTPI

an Inspector appointed by the Secretary of State
for Communities and Local Government

The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN
☎ 0117 372 8000

Date 16 July 2008

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO THE BEDFORD BOROUGH COUNCIL TOWN CENTRE AREA ACTION PLAN

DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 4 July 2006

Examination hearings held between 22, 23 and 24 April 2008

File Ref: LDF000276

1 Introduction and Overall Conclusion

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
 - (a) whether the DPD satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document; and,
 - (b) whether the DPD is sound.
- 1.2 This report contains my assessment of the Bedford Borough Council Town Centre Area Action Plan (TCAAP) DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.
- 1.3 My role is to consider the soundness of the submitted TCAAP DPD against each of the tests of soundness set out in Planning Policy Statement 12: Local Development Frameworks (PPS12). In line with national policy, the DPD is presumed to be sound unless it is shown to be otherwise by evidence considered during the Examination. The changes I have specified in this binding report are made only where there is a clear need to amend the document in the light of the tests of soundness in PPS12. None of these changes should materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.
- 1.4 My report firstly considers the procedural tests, and then deals with the relevant matters and issues considered during the examination in terms of the tests of conformity, coherence, consistency and effectiveness. My overall conclusion is that the TCAAP is **sound**, provided it is changed in the ways specified. The principal changes which are required are, in summary:
 - a) Changes to the terminology employed to make the DPD clearer in the way in which its provisions will be applied;*
 - b) Changes to ensure that part of the DPD will be reviewed at an early date to provide a robust strategy for the delivery of retail floorspace in the medium and longer term; and,*
 - c) Changes to provide a robust monitoring and implementation regime which will enable the Council to respond to changing circumstances.*

My report sets out all the detailed changes required, including those suggested by the Council, to ensure that the plan meets all the tests of soundness. The changes are set out in Annex A to this report with changes to Tables 5 and 5a and to Table 6 set out separately in Annexes B and C respectively. The PEC changes are proposed by the Council. They have been consulted upon and their effect on the Sustainability Appraisal which accompanies the TCAAP has been assessed. The PC changes are also proposed by the

Council but they have not been consulted upon. The IC changes are those which I have recommended. I consider that the PEC, PC and IC are necessary to make the DPD sound. The MC changes are minor changes which do not have an impact on the soundness of the DPD.

2 Procedural Tests

Test 1 - Consistency with Local Development Scheme

- 2.1 The TCAAP is identified in the Council's Local Development Scheme (LDS) adopted in 2005. It sets out the spatial vision, strategy, allocations and development control policies for the defined Town Centre and the remainder of the surrounding area. The timetable for production of the TCAAP set out in the 2005 LDS has 'slipped' – it was originally intended that the DPD would be formally adopted by the end of 2007. The LDS has been updated and in the September 2007 version it was predicted that formal adoption would take place in March 2008. Again the programme has 'slipped' slightly but I do not consider that this has any bearing on the soundness of the DPD.
- 2.2 I am satisfied that, as the preparation of the DPD has been generally in accordance with the LDS, Test 1 has been met.

Test 2 - Compliance with Statement of Community Involvement (SCI) and Associated Regulations

- 2.4 The Council's SCI was adopted in May 2006 by which time consultation on Preferred Options had already taken place. The Council has confirmed that, prior to adoption of the SCI, it complied with the guidance contained in PPS12 which advises that, in these circumstances, the Council must comply with the minimum requirements set out in the Regulations. From the Submission stage, consultations took place in accordance with the SCI.
- 2.5 After its Submission the TCAAP was formally amended – the PEC changes numbered PEC25-36. Consultations were undertaken in line with the guidance set out in the box following paragraph 4.18 of PPS12. The changes were subject to the same process of publicity and the opportunity to make representations as the submitted TCAAP. No evidence has been put before me to indicate that the Council's consultation procedures in respect of the TCAAP or the PEC changes were in any way deficient.
- 2.6 I am satisfied that the TCAAP was prepared in compliance with the minimum requirements set out in the 2004 Regulations and in compliance with the SCI after this had been approved. Test 2 has therefore been met.

Test 3 - Sustainability Appraisal

- 2.7 In accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (the EAPP Regulations) the Council consulted English Nature, the Environment Agency, English Heritage and the Countryside Agency and others on the scope and appropriate level of detail of information which should be included in the Sustainability Appraisal Report (SAR). The Initial Sustainability Report was published alongside the Issues and Options paper and SARs were published at both Preferred Options and Submission stages.
- 2.8 The TCAAP SAR was re-appraised in the light of the PEC changes. It was concluded that there would be no material impact on the SAR already undertaken.
- 2.9 The SAR was carried out by a team, including Council officers, with other 'observers', made up of Council officers and representatives from relevant non-Council bodies. The Council has confirmed that the SAR meets all of the requirements for sustainability appraisal and strategic environmental assessment set out in the relevant regulations and guidance and it is not aware of any shortcomings in its preparation.
- 2.10 Natural England has confirmed that the TCAAP has been adequately assessed under the Conservation (Natural Habitats, etc) (Amendment) (England and Wales) Regulations 2006 and that it agrees with the conclusion that the policies of the DPD are unlikely to have a 'likely significant effect' on the European sites which have been identified. In these circumstances, further stages of appropriate assessment are not required.
- 2.11 I have seen no evidence to suggest that the SAR was not properly undertaken or that a more rigorous re-appraisal would have produced any different conclusions. In these circumstances Test 3 has been met.

3 Conformity, Coherence, Consistency and Effectiveness Tests (tests 4-9)

Tests 4A and 4C - Spatial Plan and Conformity with Regional Spatial Strategy.

- 3.1 The key principles of spatial planning are set out in paragraphs 30-32 of Planning Policy Statement (PPS)1: Delivering Sustainable Development, paragraphs 1.8-1.11 of PPS12 and the PPS12 companion guide – Creating Local Development Frameworks. The latest version of PPS12 the place shaping and delivery process involved in local spatial planning. The TCAAP sets out a clear spatial vision for the defined town centre and its immediately surrounding area which is distinctive in that it deals with specific issues peculiar

to the plan area. It identifies clear objectives designed to deliver the vision.

- 3.2 PPS1 states that spatial planning goes beyond traditional land use planning. The TCAAP focuses on the delivery of a number of major development sites. However, its objectives and provisions are much more widely based, seeking to deal with the consequences of development and the delivery of wider changes to the make-up, operation and integration of the area within and surrounding the defined town centre. In my view the TCAAP goes beyond a narrow land use focus and deals with wider issues appropriate to a spatial plan.
- 3.3 Consultations have been carried out in line with the Council's recently approved SCI. I have already concluded that the Council has satisfied Test 2. None of the major service providers have raised general objections in response to consultation. It can be assumed, therefore, that the provisions of the TCAAP are in-line with their own programmes. The Council consulted neighbouring local authorities during the plan preparation process. I am satisfied that adequate opportunity has been provided to these authorities to identify any cross-border conflicts which may arise.
- 3.4 I deal with aspects of the consistency between the TCAAP and national planning policy elsewhere in this Report. The strategy of the TCAAP reflects that of Regional Spatial Strategy (RSS) embodied in the Milton Keynes and South Midlands Sub-Regional Strategy (S-RS) which sets out that the revitalisation of Bedford town centre and enhancement of retail, cultural and leisure facilities are key priorities. The East of England Regional Assembly confirmed that the TCAAP was in general conformity with, what was then, the emerging East of England Plan. The East of England Plan was published shortly before this Report was completed. The TCAAP is in-line with Policy SS5 of the adopted document which identifies Bedford/Kempston as a priority area for regeneration and with Policy SS6 which requires that town centres should continue to be the focus for investment, environmental enhancement and regeneration. I am satisfied that the TCAAP is in general conformity with RSS.
- 3.5 The Council's Core Strategy and Rural Issues Plan DPD (CSRIP) was formally adopted in early 2008. The provisions of the TCAAP are in-line with the strategy set out in that 'parent' document, in particular with Policies CP19 and CP20. In these circumstances, I am generally satisfied that the TCAAP embodies an integrated approach to other strategies and policies, in particular the RSS and the CSRIP.
- 3.6 The TCAAP should provide a framework which, with proper monitoring, will allow responses to be made to changing circumstances at local, regional and national levels. Table 6 in Appendix D of the TCAAP sets out a list of plan objectives, policies, targets and indicators. The Council has proposed amendments to the table to make it a more robust tool in identifying shortfalls or non-

delivery against objectives and targets. I deal with this matter in greater detail below. However, for the purposes of this test, I am satisfied that deliverability of the CSRIP has been addressed.

- 3.6 I conclude, therefore, that the TCAAP seeks to embody the six principles which define spatial planning as set out in the companion guide to PPS12. It attempts to be visionary, wide-ranging, participative, integrating, responsive and deliverable. In my opinion, the DPD is generally in-line with the descriptions of spatial planning contained in PPS1, PPS12 and in the latest version of PPS12. No evidence has been put before me which demonstrates that it is unsound in this regard. In these circumstances, I am satisfied that it is a spatial plan and that it is in general conformity with the RSS. With the changes proposed, I conclude that the TCAAP is sound so far as Tests 4A and 4C are concerned.

Test 5 – Community Strategy

- 3.7 The Community Plan for Bedford was published in 2005 and covers the period up to 2010. Table 4 in Appendix B of the TCAAP sets out the relationship between the objectives of the TCAAP and the provisions of the Community Plan. Additional information provided at the Hearings sessions shows the relationship of the Community Plan themes to the objectives, spatial issues and policies of the TCAAP. In the light of this, I am satisfied that the TCAAP has proper regard to the community strategy and I conclude that it is sound so far as Test 5 is concerned.

The Main Issues

Issue 1 – Is the terminology employed in the DPD sufficiently clear to enable users of the document to be certain of the way in which its provisions will be applied?

- 3.8 The TCAAP should be unambiguous and capable of being clearly understood by its users. The Council has employed a number of different terms to describe the core of the town centre and the defined Primary Shopping Area (PSA). Because it has a bearing on the way in which policies will be applied, I consider that the distinction should be made clear. The Council has proposed a number of amendments which provide consistency in the use of the various terms employed (MC1-8). Whilst these changes add clarity to the TCAAP, I do not consider that they are such that they could have led a plan user to misinterpret the document in any material way. In my view, they do not impact on the overall soundness of the document. The changes have not been advertised but I am satisfied that they are sufficiently minor that they can be made without the need to re-consult or to undertake a re-assessment of the SA.
- 3.9 Of more importance is the Council's use of the term 'town centre'. The term is included in the 'Glossary of Terms' in Appendix I to the TCAAP. The definition is clear in that it refers to the area defined on

the Proposals Map and, in that sense, it is being properly employed. However, the Council has also used the term throughout the TCAAP in a general sense to refer to whole of the plan area. Given that national guidance in Planning Policy Statement 6: Planning for Town Centres (PPS6) is heavily dependent on the use of the term in a specific sense to guide development, I consider that it is important that the TCAAP should not introduce any ambiguity in the way in which the term is employed.

3.10 Policy TC1 of the TCAAP makes clear that the extent of the town centre for the purposes of PPS6 is that area defined on the Proposals Map and this is helpful. Together with the definition in the glossary, it should have prevented users of the DPD from interpreting the term in its general sense when it was being employed in its specific sense. Nonetheless, the use of the term in its general sense in the TCAAP could still be misconstrued as meaning the specifically defined area and this could have led to confusion in the interpretation of policies and text.

3.11 The Council has proposed a number of changes to the TCAAP in an effort to resolve any confusion which may arise when it comes to the application of the DPD provisions (PC1-43). Essentially, where the term 'town centre' is used in its specific sense no change has been made but where it is used in the general sense the term has been altered by either deleting it or replacing it by the term 'Plan Area'.

3.12 I consider that the proposed changes provide considerable clarity to the DPD provisions. However, the proposed changes have not been advertised and re-assessment of the SA has not taken place. I am concerned to ensure that the changes would not result in alterations which alter the meaning of the DPD in ways which were unexpected by consultees. I have considered each change in turn by asking "Given the context in which the reference is used, could a consultee have reasonably misinterpreted the meaning of the term 'town centre' and, if so, would this have had any material effect on the thrust of the provisions of the DPD?" I have concluded that there are some cases where the context does not make the use of the term entirely clear. However, I do not consider that, in any case, the essential thrust of the plan provisions would be altered in a material way by the change. In these circumstances, I recommend that the changes be made.

3.13 I consider, therefore, that, with the changes recommended below, the TCAAP would satisfy Tests 4B, 6 and 7 of PPS12 so far as this main issue is concerned.

3.14 In order to make the Core Strategy sound, the following changes are required:

PC1-43

Issue 2 – Do the defined boundaries of the Plan Area, the Town Centre and the Primary Shopping Area comply with the advice contained in PPS6?

- 3.15 The general strategy of the TCAAP follows the guidance set out in PPS6 in that it seeks to focus retail development in an expanded PSA and to direct new leisure and office development to locations in and around the defined town centre. I am satisfied that it complies with national guidance in this regard.
- 3.16 The Plan Area includes the defined town centre and a number of adjacent areas where development opportunities exist. Some small areas of opportunity adjoining the western boundary of the Plan Area have been excluded but I have no strong grounds for considering that the Plan Area should have been made larger to include these.
- 3.17 Clearly the area covered by the TCAAP interacts with a wider area, for example the river corridor and facilities on nearby sites. Proposals for new or expanded main town centre uses in these locations would need to be tested against the requirements of PPS6, saved Local Plan policies and policies elsewhere in the LDF. The TCAAP properly concentrates on the town centre and its immediate surroundings which is a relatively compact area and I have neither heard nor read any evidence to persuade me that the Plan Area should necessarily be extended to cover additional areas. I do not consider that the TCAAP should contain policies which apply to a wider area. Such policies would be more appropriately located in other parts of the Local Development Framework. In my opinion the meaning of the reference to 'out of centre' retail provision in the second bullet of paragraph 6.13 is clear and requires no alteration.
- 3.18 In Annex A to PPS6 'town centre' is defined as including the PSA and areas of predominantly leisure, business and other town centre uses within or adjacent to the PSA. The town centre defined in the TCAAP generally follows this advice. It could be argued that the hotel/conference/leisure complex on the corner of St Mary's Street and Duck Mill Lane could have been included and that the mainly residential area between Midland Road and the river could have been excluded. However, I have no strong reasons for recommending any changes.
- 3.19 Annex A to PPS6 defines the PSA as the area where retail development is concentrated. At the Hearings sessions the Council conceded that it had not undertaken any 'scientific' analysis to determine this. However, I agree with the Council that the compact nature of the town centre makes the main concentration of retail development readily identifiable 'on the ground'. I have no grounds for concluding that the existing PSA has been incorrectly drawn. The Council has included the site of the Bedford Town Centre West development site in the PSA boundary. Given the large element of retail and leisure development included in the proposal and the advanced stage which it has reached in the planning application process, I consider that this is a pragmatic decision in the circumstances.

3.20 I consider, therefore, that TCAAP satisfies Tests 4B, 6 and 7 of PPS12 and is sound so far as this main issue is concerned.

Issue 3 – Does the DPD make adequate provision to meet the identified need for retail floorspace?

3.21 Through consultants the Council undertook a Retail Study in 2005. This pointed out that previous studies undertaken in 1995, 1997 and 2000 consistently indicated that the town centre of Bedford was not performing as well as competing centres and that, in the absence of new town centre development, the comparison retail offer of the centre was likely to be vulnerable. The 2005 study indicates that planned investment in competing centres will strengthen their role in the retail hierarchy and will increase their market share from the Bedford catchment area. It concludes that new development in the town centre is now critical to safeguarding its future. The 2005 study's examination of the existing retail offer in the town centre identifies the lack of large, modern, quality units, a quality modern foodstore and eating/drinking/leisure units as weaknesses. Even having accounted for increases in Internet shopping, it identifies an unmet capacity of 5,272 m² net of additional convenience goods floorspace by 2009, increasing to 6,672 m² by 2011. In terms of comparison goods it identifies capacity of up to 30,530 m² net at 2011 rising to up to 47,712 m² net at 2016. Whilst the study states that the 2011 figure can be treated as being a 'robust estimate' it advises caution with regard to the 2016 figure. However, it also advises that the Council should continue to plan for significant comparison goods development beyond 2011.

3.22 Policy TC2 of the TCAAP generally follows the guidance provided by the 2005 retail study in that it states that provision will be made for up to 47,000 m² net of additional comparison goods retail floorspace together with up to 6,000 m² net of retail floorspace for convenience goods; a total of 53,000 m². However, the DPD does not make provision to satisfy this requirement. The DPD identifies 3 main sites which will provide new retail floorspace: Bedford Town Centre West site, Castle Lane and Riverside Square. The latter 2 sites will, together, provide about 1,200 m² of retail floorspace. By far the biggest contribution will be made by Bedford Town Centre West and Policy TC7 states that this site will contribute up to 30,000 m² of retail floorspace. The Council's Committee report on the planning application for the site indicates that 31,745 m² of Class A1 retail would be provided. However, this takes no account of retail units which would be lost by redevelopment. The Council estimates that this loss could amount to about 6,200 m² net floorspace. The Bedford Town Centre West site would, therefore, deliver 25,545 m² of retail floorspace net of demolitions. With the floorspace derived from the other 2 allocated sites, the total provision made in the TCAAP is 26,745 m². This falls short of the 'robust estimate' of requirement up to 2011 and significantly short (about half) of the provision which Policy TC2 seeks.

- 3.23 I note that the requirements for retail floorspace in the DPD are expressed in terms of 'up to'. This gives a certain amount of flexibility. However, the extent of the shortfall in provision when measured against these targets is considerable. The Council is reluctant to allocate sites which would be capable of satisfying the whole of the requirement to 2016. It argues that, given the lack of retail investment in the past and the potential for 'theoretical' forecasts of requirements over the medium and long term to be inaccurate, it is approaching the issue cautiously. From my own visits to the area, it appears to me that there has been considerable retail investment in Bedford in the recent past but that most of it has taken place on out of centre sites. However, I can understand the Council's caution regarding longer-term forecasts and its approach accords with the advice in the 2005 retail study. I can also understand the Council's concern that allocation of sufficient sites to meet the predicted requirements for retail floorspace to 2016 could divert investment away from the Bedford Town Centre West site.
- 3.24 The 2005 Retail Study identifies the Bedford Town Centre West site as the only current opportunity in the town centre for major retail development which has the potential to accommodate significant new retail floorspace and could link effectively with the PSA. I have seen no clear evidence to persuade me that this is not the case. However, the site is likely to be difficult to deliver given the number of relocations, road improvements, etc which are required. Other sites which may not have the same difficulties could well be more attractive to developers. Diversion of interest to other allocated sites could place development of the Bedford Town Centre West in jeopardy and the benefits of a scheme of that scale in terms of public transport provision, leisure development and residential development would be lost. I agree with the Council therefore that, at this stage, making allocations to meet the whole of the retail requirement to 2016 would not necessarily be a sound approach.
- 3.25 However, there are dangers in adopting the Council's adopted approach. Should, for whatever reason, the Bedford Town Centre West site not proceed or be delayed, the Council could be faced with retail developers, armed with the Council's own predicted retail floorspace requirements, who are seeking to locate on out-of-centre sites because no readily available opportunities are identified in the town centre/PSA. Alternatively, if the Bedford Town Centre West does proceed, the same developers could argue for development of an out-of-centre site in order to meet the predicted floorspace requirement at 2016. The 2005 Retail Study warns of the dangers that further out-of-town retailing could pose to the regeneration strategy for the town centre. It is therefore important in my view that the TCAAP should embody a strategy which enables the Council to effectively resist such proposals.
- 3.26 In the text accompanying Policy TC2 the Council points out that post 2011 it will be necessary to expand the PSA to accommodate additional retail floorspace requirements and states that such expansion is likely to be to the north of the existing PSA. Expansion

of the PSA to the north is referred to in the 2005 Retail Study (paragraphs 7.39 and 7.51) although the potential of this area to deliver floorspace to meet requirements is not explored in any great detail. At the Hearings sessions the Council produced a 'Note Concerning Retail Floorspace'. This provided some detail on the way in which it expected that expansion of the PSA to the north and intensification elsewhere in the PSA could deliver the necessary additional retail floorspace. However, the potential for these sites to come forward and to deliver the floorspaces predicted is largely unsubstantiated and, in my opinion, would be unlikely by itself to provide the type of robust case needed to successfully counter out-of-centre proposals.

- 3.27 In these circumstances I consider that the TCAAP should contain a clear and unambiguous statement explaining that the retail strategy contained in the TCAAP should be seen as the first phase of an ongoing process and that a thorough review will be undertaken in the light of progress on the existing retail allocations and other growth to identify areas where any identified future retail growth requirements can realistically be met. At present the TCAAP does not contain such a commitment. The Submission version of the TCAAP states that expansion of the PSA to the north may be necessary to accommodate additional retail floorspace beyond 2011. In my view this is inadequate to provide the basis for the type of robust strategy which I have described above. I do not, therefore, consider that the Submission version of the TCAAP goes far enough in providing a strategy for meeting future needs for retail development.
- 3.28 The Council has proposed changes to the DPD (PEC25 and 26) which go some way to providing the explanation of the strategy which I consider is necessary. However, I still consider that it does not go far enough. I consider that a robust strategy must contain a firm commitment to a timetable for review of the situation and should not fetter itself by seeking opportunities for expansion in only one area. I have recommended the inclusion of appropriate text in the TCAAP between Policies TC2 and TC3 together with consistent text in paragraph C.2 (IC1 and IC3).
- 3.29 I have amended criterion 4 of Policy TC41 (IC2) to bring it more closely into line with the advice contained in PPS6 with regard to the sequential testing of retail proposals outside the Primary Shopping Area. While I accept that paragraph 3.7 of PPS6 gives some discretion in the level of detail, type of evidence and analysis which may be required in individual cases, it does not remove the need to undertake the test.
- 3.30 I consider, therefore, that, with the changes recommended below, the TCAAP would satisfy Tests 4B, 6 and 7 of PPS12 and would be sound so far as this main issue is concerned.

3.31 In order to make the Core Strategy sound, the following changes are required:

IC1, IC2 and IC3

Issue 4 – Does the DPD embody a sound approach to the regeneration of the town centre and to the development of allocated sites in the plan area?

3.32 The Bedford Borough Local Plan which was adopted in 2002 identified a number of town centre opportunity sites. Exhibitions held at the end of 2001, 2002 and 2004 sought views and opinion on options for the sites. These led to the publication of a Development Framework Study in 2005. The Area Development guidance produced as part of the Development Framework Study considered various alternative land uses for each of the opportunity sites. This fed into the preparation of the TCAAP Issues and Options paper and this in turn was refined to produce the Preferred Option. It would appear that there was considerable opportunity through this somewhat drawn-out process for the consideration of alternatives and options. The Council claims that its proposals received a considerable amount of public support and I have seen no clear evidence to demonstrate that this was not the case. I am satisfied that, in drawing up the TCAAP, there was ample opportunity to question the Council's strategy for the town centre.

3.33 The Council's strategy for the regeneration of the town centre is based upon the development of a small number of sites. I can see no reason for some claims that this strategy, in itself, is contrary to national guidance. The 2005 Retail Study draws attention to a lack of large, modern units in the centre. I have seen no clear evidence which indicates to me that there are other sites or other opportunities in the PSA and the defined town centre which would deliver the type of units which are required. I accept that a piecemeal approach to the provision of new units may assist in permitting the PSA to retain its current character. However, I have seen no evidence to suggest that this alternative approach would be successful. Indeed, the fact that it does not appear to have delivered significant improvements in the past would tend to suggest that this approach is unlikely to be successful in the future. Such an approach is unlikely to deliver the benefits which would derive from the Council's preferred approach in terms of public transport improvements, housing and ancillary leisure facilities and would make the delivery of a balanced package of town centre facilities much more difficult to achieve.

3.34 However, the Council's preferred approach is not without its risks. For instance, the shift of focus of town centre activity to the west could result in areas such as High Street becoming more marginal. The TCAAP recognises this possibility and seeks to address it. At the Hearings sessions some representors expressed the opinion that the Council's approach was 'a gamble'. While I take the point, the same could be said for any approach. A wide range of unpredictable circumstances could affect delivery of the proposed development proposals. However, that should not prevent the Council from planning ahead. In this sense the Council's approach to retail floorspace provision is pragmatic with its short-term focus and the opportunity to undertake a review in the light of developing

circumstances. However, such a methodology needs to have a clear commitment to regular review. This makes the change which I have already recommended (IC1) more important.

- 3.35 The Council's strategy of concentration on large development sites could give rise to difficulties in terms of land assembly. Policy TC38 indicates that the Council will consider exercising its compulsory purchase powers to assist in this regard. This is little more than a statement of the Council's powers. It does not commit the Council to the use of such powers or remove its need to justify their use. In my opinion it would be wrong at this stage to identify particular locations where these powers would be used. Their use in any given situation would depend on the circumstances pertaining at that time. I am satisfied that Policy TC38 is sound as it stands.
- 3.36 The Council's approach to the larger development sites relies on the creation of 'Quarters' focussed on various activities. While there is a degree of concentration of certain activities on certain sites, retail floorspace, residential development and leisure activities are represented on all the sites located closest to the PSA. The PSA is compact and, even where there is a degree of concentration - such as in the case of retail floorspace in the Bedford Town Centre West site - I do not consider that the new development would be so remote from other parts of the town centre that the parts could not interact as a whole to form the type of integrated centre envisaged in PPS6.
- 3.37 In these circumstances, I am satisfied that the Council's general approach of concentrating development on large new sites is sound.
- 3.38 The main development opportunities in the Plan Area are subject to explanatory text and individual policies. I deal with various issues raised in respect of individual sites below.

Bedford Town Centre West – Policy TC7.

- 3.39 The Council has resolved to grant planning permission for the development of the Bedford Town Centre West site subject to the completion of an agreement under Section 106 of the Act. I have read the Committee report which describes the proposal. The description generally accords with Policy TC7. The 2005 Retail Study states that this site is the only opportunity in the town centre to provide the range of retail units which are necessary to regenerate the retail offer. I have seen no evidence to persuade me that this is not the case. The TCAAP should only give a general indication of the proposed development of the site. Various detailed concerns raised by representors such as the positioning of the bus station have been, and will be, addressed through the development control process.
- 3.40 The development proposals detailed in the TCAAP will involve considerable disruption to, and in some cases re-location of, those who occupy premises which are to be demolished. Clearly this will need to be handled sensitively. I heard evidence at the Hearings sessions which indicated that, as the development proposals move forward, negotiations are being undertaken to identify appropriate measures and strategies for relocation, including the relocation of the

police station. The Bedford Town Centre West site is a particular concern given the large number of elderly persons who currently occupy flats on the site. However, I heard that the Council and its development partners had put in place linkages between themselves, the housing association which owns the flats and local residents in order to facilitate the necessary moves. I have seen no evidence to suggest that the process is not being managed properly although close and regular contact will be necessary if the process is to be successful. As the development proposals are worked up in more detail, phasing plans will become clearer but it would be inappropriate to include this level of detail in the TCAAP. I heard evidence which indicated that these matters are being properly taken forward through the development control process.

- 3.41 Policy TC32, which promotes a high quality public realm, will apply equally to the Bedford Town Centre West site as it will to other parts of the town centre. I see no sound reason to include a separate reference to the matter in Policy TC7.

Retail Reinvestment and High Street – Policy TC8

- 3.42 The text on page 22 of the TCAAP recognises that the Bedford Town Centre West could have an adverse impact on retail premises in High Street. Policy TC8 states that a strategy will be prepared for the 'renaissance of the High Street' and the accompanying text indicates that the High Street will be helped to 're-invent' itself. In my opinion the Council's approach is generally sound. The re-focusing of the retail offer towards the western edge of the PSA will almost inevitably mean that High Street will need assistance if its importance to the town centre is not to decline. A vibrant High Street will be important to the town centre generally as it will provide a separate focus which will draw shoppers and visitors through the central part of the PSA. High Street has much to build upon. Many of the buildings have attractive facades and pedestrianisation proposals will allow a significant improvement to its character.
- 3.43 The photographs on page 2 of the TCAAP are an example of the way in which a street can be 're-invented'. I consider that the text on page 22 makes this clear. The Council explained at the Hearing sessions that it was not an example that it would necessarily wish to follow in detail in High Street. I am satisfied that the photographs would be seen in that context and would not commit the Council to adopting an approach which would be inappropriate to the character of High Street.
- 3.44 It is clear to me that the Council takes the future of High Street seriously and this is demonstrated by the deliberations of its Town Centre Working Group. However, I would urge the Council to move quickly in drawing up its strategy for High Street. The knowledge that the Bedford Town Centre West development is coming forward in the short to medium term may dissuade investors from committing to High Street and the decline of High Street could begin long before the Bedford Town Centre West units are available for occupation. A drift

of interest away from High Street may be easier to prevent at this stage rather than to cure once it has begun.

Cultural Quarter – Castle Lane - Policy TC9

3.45 Development of this site in line with the requirements of Policy TC9 was nearing completion at the time of the Hearings sessions.

Cultural Quarter – Art Gallery and Museum – Policy TC10

3.46 At the time of the Hearing sessions refurbishment of the museum and art gallery was nearing completion and a planning application for the residential element had been received.

Riverside Quarter – Riverside Square – Policy TC11

3.47 The Council made a resolution to grant planning permission subject to the completion of a Section 106 agreement in October 2007. I understand that the agreement is now completed and that development in line with the provisions of Policy TC11 is due to start.

3.48 A key element of the Council's strategy is to provide a balance of uses in the town centre. The Riverside Square development will comprise leisure uses around a public space facing the river with residential accommodation above and retail units facing towards the PSA. The appropriateness of the architectural style employed in the proposed building can be disputed. However, that level of detail is beyond the scope of the TCAAP and has been properly considered through the planning application process. I consider that the general principles of the proposal are sound. It seeks to link the PSA to the attractive riverside and provides access across the river to draw pedestrians through the site to the PSA.

3.49 It has been suggested by a representor that the site should be developed to provide an arts complex. Paragraph 75 of the adopted RSS states that a key priority for Bedford should be developing cultural and heritage-focused tourism by enhancing existing – and providing new – cultural and heritage facilities and attractions and by providing a cultural quarter close to the town centre. However, the RSS is not specific in terms of what should be provided and does not specify that a new arts complex should form part of the scheme. The Council argues that its more modest proposals at Castle Lane and the Art Gallery and Museum bring the TCAAP into line with the requirements of the RSS.

3.50 The representor's case for a new arts complex is closely argued and suggests various sources of potential funding. However, there is no clear evidence that funding would be made available or that such a proposal would be economically viable. Evidence indicates that there are already a number of theatre venues in Bedford catering for audiences of up to 850. While there is some anecdotal evidence that larger audiences could be attracted, there is no clear evidence to show that these larger audiences could be secured on a sufficiently regular basis to make a larger venue viable. The potential of the site to accommodate culturally based uses was examined as part of the Development Framework Study but it was concluded that their economic viability was questionable. I appreciate that this may not

have considered the type of complex proposed by the representor. Nonetheless, it is an indication that facilities of this type may not be commercially viable.

- 3.51 In all cases a balance needs to be drawn between competing claims on land. I have seen no clear evidence to persuade me that an arts complex is so essential to the development of Bedford and to the regeneration of the town centre that I should promote it ahead of the uses which the Council proposes for the site. In these circumstances I consider that the Council's proposals for the site are sound and are generally in-line with the RSS.
- 3.52 I can see no sound reason why the TCAAP should contain a complete list of all existing theatres in the town. Policy CP23 of the adopted CSRIP already seeks to protect or enhance cultural assets.

Riverside Quarter – Shire Hall and Bank Building site – Policy TC12

- 3.53 The structure of the TCAAP is inconsistent in that all of the main opportunity sites except for the Shire Hall and Bank Building site have associated text in the Key Areas of Change section of the Plan which sets out the Council's proposals. The Council accepts that text related to this site was omitted in error and has provided a section of text to remedy the omission. While it does not go to the overall soundness of the DPD, I consider that the additional text should be included in the interests of consistency (MC10).
- 3.54 The Council describes the development being sought for the site as including a 'signature' building. I accept that the terminology used is imprecise. However, it does indicate that the Council is seeking a building of distinctive character and I consider that, in this important gateway location, such a requirement is appropriate. The policy goes on to state that the building should complement the historic and riverside setting and, in my opinion, this puts the term 'signature building' into its proper context. I consider that the use of the word 'signature' is not inappropriate in these circumstances.
- 3.55 The Council accepts that demolition of parts of the historic fabric of the existing buildings to facilitate development should only be contemplated in exceptional circumstances. Such works would need to be considered through the normal consents regime although it is clear that preliminary work has indicated that some demolition to achieve an access solution may be necessary. However, Policy TC12 does not condone demolition. It directs that such works need to be fully justified having evaluated all reasonable options. In this respect I am satisfied that the policy is sound and it is proper that it should address the issue of demolition in circumstances where it is anticipated that it could possibly arise as part of development proposals.

Station Quarter – Bedford Station – Policy TC13.

- 3.56 The adopted RSS identifies the need to create a focus for offices in Bedford town centre as part of its key priorities. Paragraph 4.23 of the CSRIP follows this lead and states that, in-line with national policy, the town centre will be the preferred location for office

provision. CSRIP Policy CP11 seeks the provision of an additional 75 ha of employment land in the period up to 2021 with the emphasis on creating Class B1 environments. Policy TC13 of the TCAAP and the proposals for the Station Quarter follow this strategic direction.

- 3.57 The Council acknowledges that there is no proven need for office development on the site at present. However, the intention is to create an office market. The Council's 'Property Market Report' document recognises that this will be 'a challenge' but also recognises that the site does have certain positive attributes.
- 3.58 Since the TCAAP was submitted work on drawing up a masterplan has taken place and, at the time of the Hearing sessions, a planning application had been submitted although it would appear that more information was needed before this could be determined. Nonetheless, the Council and its partners are moving forward to bring the site's development to fruition. Concerns raised at the time that the TCAAP was submitted, notably by Network Rail, have been overcome and Network Rail now strongly supports the proposals and is working with the Council and its partners to oversee the masterplanning process. The concerns of other representors that the Council's proposals do not take proper account of planned railway improvements and station design issues should, therefore, be groundless. Provisions of the Council's CSRIP indicate that it will support the Oxford to Bedford rail scheme.
- 3.59 The Council's proposals for the site are ambitious. However, I have seen no evidence to persuade me that they are unrealistically optimistic. In my view the proposals are sound.

Lime Street – Policy TC16

- 3.60 I understand that this site has been available for development for some years. No programme for delivery of the site has been included in Table 5 in Appendix C of the TCAAP. The Council displayed sketch proposals for the site at the town centre public exhibition in early 2008 but, otherwise, there appears to have been little progress towards development. However, the site is on the edge of the Primary Shopping Area, in a location which could provide any necessary extension of the Primary Shopping Area in the future. While there is no immediate prospect of development, I am satisfied that the site should continue to be identified as being available.

Other sites

- 3.61 I am satisfied that the Council's detailed policies in respect St Mary's Quarter, Kingsway Quarter, and Progress Ford (Policies TC14, TC15, and TC17) are sound.

Other issues

- 3.62 I am satisfied that the Council's approach to developer contributions is properly set out in Policy TC40 in that it makes reference to a 'proven' direct or indirect impact.
- 3.63 A strategic flood risk assessment has been undertaken. Whilst there are some concerns about that document's conclusions, part 8 of

Policy TC41 requires that each development proposal should be accompanied by its own site specific flood risk assessment. In these circumstances, I am satisfied that the application of Policy TC41 will ensure that the precise details of developments on individual sites will properly respect flooding issues.

- 3.64 Table 2 of the TCAAP sets out the number of residential units which can be expected from each of the key development sites. The Council provided an up-dated table as PEC27 and provided further more up-to-date information to the Examination. The figures show gross numbers and are exclusive of demolitions. I have recommended the inclusion of the up-to-date Table 2 information together with a note clarifying that the figures are net of demolitions (MC15). I am satisfied that, with the amendments, Table 2 is clear in the information it contains and in its purpose. Information on housing delivery matters is set out elsewhere in Table 3 of the Core Strategy and in the Annual Monitoring Report.
- 3.65 At the Hearing sessions the Council suggested that an additional criterion be added to Policy TC41 to require that all proposals for residential development should include evidence to demonstrate that air quality on the site is acceptable. While this does not affect the overall soundness of the DPD, I consider that it could be usefully added in order to guide developers (MC16).
- 3.66 I consider, therefore, that the TCAAP satisfies Tests 4B, 6 and 7 of PPS12 and is sound so far as this main issue is concerned.

Issue 5 – Does the DPD display a coherent and consistent approach to transport issues in the plan area?

Highway infrastructure issues

- 3.67 Policies TC18, TC19 and TC20 of the Submission version of the TCAAP set out a series of highway improvements. The improvements were anticipated in the Transportation Strategy of the Town Centre Development Framework Study. Since the TCAAP was submitted, analysis of the need for highway improvements has moved forward. That Transportation Strategy led to the Stage 1 Faber Maunsell Transportation Study which identified some key areas of improvement. Stage 2 of the study will review the proposals in greater detail. A recommended strategy has been drawn up and has been accepted by key stakeholders, the Council and the highway authority.
- 3.68 The lists of highway improvements in the Submission version of the TCAAP are unrelated in any clear way to development proposals. However, the consideration of major development proposals scheduled for the period up to 2011 through the development control process has led to specific highway improvement requirements. By the time of the Hearing sessions the Council's views on the highway improvements anticipated by the Transportation Study had also become much firmer.

- 3.69 Following the Hearings sessions, the Council has proposed changes to bring Policies TC18, TC19 and TC20 and their associated text up-to-date (PC45) and to provide clearer linkages between development proposals and related highway infrastructure. I am satisfied that the proposed changes give clearer direction and that they should be incorporated into the TCAAP. I also consider that an appropriate cross-reference could be usefully added to Policy TC7 vii) (PC44) to provide a link between necessary highway infrastructure improvements and the Bedford Town Centre West proposal.
- 3.70 The proposal to provide an additional traffic crossing of the river – the Batts Ford bridge – is included in the highway authority's Local Transport Plan 2006/7-2010/11. I heard evidence at the Hearings sessions which indicated that the highway authority fully supported the proposal and that inclusion of the scheme in the TCAAP was a necessary pre-requisite to securing grant assistance from central government.
- 3.71 At the Hearing sessions the Council made clear that it was aware that a new road bridge could simply increase accessibility to the town centre by private cars. However, this is not the intention. At paragraph 5.1 the TCAAP states that its overall strategy is to realise greater network efficiency, to manage demand and to achieve higher levels of modal shift to public transport. It makes clear that it is seeking to find the right balance between road based provision and more sustainable alternatives. Such an approach is generally in line with national guidance. The Stage 2 Transportation Study will determine the function of the new bridge link and its role in providing public transport priority and dedicated pedestrian/cycleway links. Paragraph 5.8 of the TCAAP makes clear that a new river crossing will allow improvements to be made to bus routeing and public transport accessibility and priority in the town centre.
- 3.72 I am satisfied that the provision of an additional traffic crossing of the river would not necessarily add to traffic congestion in the town and that it is the Council's intention make use of the crossing to improve the movement of more sustainable modes of travel and as set out in paragraph 5.8. The Council has proposed an addition to paragraph C.3 of the TCAAP which commits it to a review of the strategy of the DPD if necessary additional network capacity is not delivered. I consider that this would be a prudent approach and recommend that the change be made (PEC29).

Car parking issues

- 3.73 Policy TC24 of the TCAAP sets out the Council's parking proposals. Concerns have been raised that the proposed parking strategy will be damaging to the vitality of the town centre in that shoppers will choose to shop at alternative locations where car parking is freely available. I accept that this is a risk. However, the challenge will be to make the town centre sufficiently attractive that it will be the preferred destination even if car parking is limited. A policy which encouraged use of the private car by making parking freely available would be contrary to the aim of national policy which encourages the

use of more sustainable modes. While some representors claim that 'park and ride' schemes are unattractive to Bedford residents, I have seen no evidence to prove that this is necessarily so. The Council's parking policy, including its pricing policy, is intended to favour short-stay rather than long-stay parking. Allied to proposals to improve public transport, I am satisfied that this approach would not detract from the attractiveness of the town centre.

- 3.74 During the Examination the Council proposed additions to the text accompanying Policy TC24 which explain the background to the Council's approach to car parking and which provides additional information on various elements which will contribute towards delivery of the strategy. While this does not have a bearing on the overall soundness of the DPD, I consider that it would be a helpful addition to the document. I recommend that it should be included (MC14).
- 3.75 Most of the car parking in and around the town centre is provided north of the river. During the Hearings sessions I heard evidence which indicated that the only car park on the south side of the river was currently under-used – drivers preferring to cross the river to busier car parks nearer to the PSA. In these circumstances I am not persuaded that additional car parking space on the south side of the river is currently required or that, if it was to be provided, that it would be used. Proposed improvements in crossings across the river and changes in the balance of town centre may alter the existing relationships in the future and, while I do not consider that the TCAAP needs alteration at this stage, I recommend that the Council keeps this point under review as part of its developing traffic strategy for the town centre.
- 3.76 Table 8 in Appendix G of the TCAAP sets out existing and future parking provision. Figures showing public parking provision at the Station Quarter have been omitted. The omission does not affect the overall soundness of the DPD but, in the interests of consistency and accuracy I have added the appropriate information to Table 8 (MC17).
- 3.77 In my view, the Council's approach to car parking, including pricing policies which would deter long-term parking, is sound.

Public transport interchanges, taxis and private hire vehicles

- 3.78 Given their relative positions, I am satisfied that, having taken into account the proposed strategy for the PSA and town centre, the proposed new bus station, bus drop-off points and the railway station are properly located. Even though it results in the main bus station and the railway station being geographically separated, I consider that it is important, for accessibility reasons, that the bus station should be as close as possible to the PSA. I have made a minor change to Policy TC23 to remove repetition in the policy's requirements (M13).
- 3.79 I am satisfied that the Council does not seek to make any distinction between taxis and private hire vehicles in its approach to providing access to the town centre. They are dealt with together in paragraph

5.13 of the TCAAP. I have made small changes to the Strategic Policy on page 14 and to Policies TC7, TC13 and TC23 to remove any doubts in this regard (MC9, MC11 and MC12) although I do not consider that it has any bearing on overall soundness of the DPD. Any other references to 'taxis' in the policies or text should be similarly changed.

Cycling issues

- 3.80 One of the objectives of the TCAAP is to improve access to the town centre by, amongst other things, improving facilities for cyclists. Policy TC21 proposes new cycle routes across the town centre to connect with existing routes and some specific development proposals make provision for new routes and a pedestrian/cycleway link over the river. However, the Council's general approach is to facilitate cycle access to the edge of the PSA where cycle parking will be provided but to prevent cycling in the main pedestrianised shopping streets. I can fully appreciate that this may be frustrating to some cyclists. However, I can also understand the Council's concerns about safety and the need to make the pedestrianised streets a comfortable shopping environment. Anyone riding a cycle is classed as a cyclist. The orders which currently ban cycling on the pedestrian streets cannot discriminate. In my experience, while some cyclists are considerate to and mindful of pedestrians and other highway users, others are not. I have noted the evidence submitted with regard to accident statistics. However, given the narrowness of some of the streets involved in this case and their regular use by pavement markets, I consider that a pragmatic and balanced approach needs to be adopted which takes into account the difficulties involved in policing partial bans.
- 3.81 The Bedford PSA is relatively compact. Routes traversing the PSA involve riding around its edge. I accept that, in some cases, riding a cycle along these routes can be an uncomfortable experience due to traffic. Nonetheless, the increase in journey length compared to riding through the centre is not great. By facilitating access by cyclists to the edge of the PSA and making adequate provision of cycle parking whilst preventing cycle access in the relatively small number of pedestrianised streets, I consider that the Council is seeking to take a balanced view.
- 3.82 Policy TC21 promotes an east-west route for pedestrians and cyclists through the Bedford Town Centre West site. However, I heard evidence that the Council had not been able to secure this route because of conflict with the design of narrow, intimate shopping streets in the development. It is clear from the Committee report on the Bedford Town Centre West planning application that the Council gave serious consideration to the matter at that stage and it has been resolved to grant permission for that scheme. As I have pointed out above, the possibility exists for cyclists to ride around the edge of the site without diverting too far from a direct route. The resolution to grant permission for the scheme specifies that provision should be made for this route by way of a legal agreement. Again it is a case where a balance needs to be drawn between the convenience of

cyclists and other interests. I do not consider that non-provision of a cycling route is fatal to the soundness of the TCAAP.

3.83 The Station Quarter proposals contain no specific requirement for the provision of a cycle/footbridge over the railway. However, I heard evidence at the Hearings sessions which indicated that a requirement in Policy TC13 for a pedestrian overbridge at the southern end of the site would enable improvements to be considered to assist cyclists using the Ford End Road railway crossing. Additionally I was informed that improvements to the Bromham Road bridge over the railway are currently being considered. It would appear, therefore, that safer crossing of the barrier posed to cyclists by the railway is already being progressed without the need for specific requirements linked to the Station Quarter development.

3.84 I consider, therefore, that, with the changes recommended below, the TCAAP would satisfy Tests 4B, 6 and 7 of PPS12 so far as this main issue is concerned.

3.85 In order to make the Core Strategy sound, the following changes are required:

PC44, PC45

Issue 6 – Whether the DPD's approach to monitoring, flexibility and contingencies meets the tests set out in PPS12.

3.86 Appendix D of the Submission version of the TCAAP sets out a monitoring framework. However, in my opinion the framework is deficient in that, whilst it indicates that monitoring will be undertaken, it does not specify at what stage the Council will react to any failures to maintain programmes or what that reaction would involve. In order to provide clear mechanisms for implementation and a flexible approach to changing circumstances, I consider that this information is necessary.

3.87 The Council has proposed a number of amendments to Appendix D and the related Table 5 in Appendix C together with the inclusion of an up-dated TCAAP Housing Trajectory (Table 5a) to address this issue (PC46-48). These comply with national guidance and are in-line with the Core Strategy. I am satisfied that, with these proposed amendments, the TCAAP would be sound. I can see no sound reason why consistency with the Local Transport Plan should be expressly demonstrated in the TCAAP. I have seen no evidence to suggest that any inconsistency exists in this regard.

3.88 I consider, therefore, that, with the changes recommended below, the TCAAP would satisfy Tests 8 and 9 of PPS12 so far as this main issue is concerned.

3.89 In order to make the Core Strategy sound, the following changes are required:

PC46, PC47 and PC48

4 Minor Changes

- 4.1 The Council has suggested several minor changes to the submitted DPD in order to address issues raised by representors in respect of community safety, heritage and biodiversity interests. None of these changes address key aspects of soundness. Some add little to the DPD but I endorse others on a general basis in the interests of clarity and accuracy. These changes are set out in Annex A (MC18-20).

5 Overall Conclusions

- 5.1 I conclude that, with the amendments I recommend, the Bedford Borough Council Town Centre Area Action Plan satisfies the requirements of s20(5) of the 2004 Act and the associated Regulations, is sound in terms of s20(5)(b) of the 2004 Act, and meets the tests of soundness in PPS12.

Roland Punshon

INSPECTOR

ABBREVIATIONS:

CSRIP – Bedford Core Strategy and Rural Issues Plan
DPD – Development Plan Document
EAPP Regulations – Environmental Assessment of Plans and Programmes Regulations 2004
LDS – Local Development Scheme
PPS – Planning Policy Statement
PSA – Primary Shopping Area
RSS – Regional Spatial Strategy
SA – Sustainability Appraisal
SAR - Sustainability Appraisal Report
SCI – Statement of Community Involvement
S-RS – Milton Keynes and South Midlands Sub-Regional Strategy
TCAAP – Bedford Town Centre Area Action Plan

Bedford Borough Council Town Centre Area Action Plan – Inspector’s Report

Annex A

Table of Recommended Changes

Ref. No.	TCAAP policy or paragraph	Report paragraph	Recommended change
Pre-Examination Changes (Advertised)			
PEC25	Bullets between Policies TC2 and TC3	3.21-28	See IC1 below
PEC26	Bullets between Policies TC2 and TC3	3.21-28	See IC1 below
PEC27	Table 2	3.64	See MC15 below
PEC28	Paragraph C.2	3.21-28	See IC3 below
PEC29	Paragraph C.3	3.72	Insert the following text at the end of paragraph C3 – A Better Connected and More Accessible Centre: 'The Council will monitor rates of infrastructure delivery and traffic levels within the Plan Area. Where additional network capacity is unlikely to be delivered within the plan period, the strategy of this plan will need to be reviewed. Any such review will also take into account any subsequent review of the East of England Plan (RSS14).'
PEC30	Appendix C Table 5a	3.86-88	See PC47 below
PEC31-36	Appendix D Table 6	3.86-88	See PC48 below
Additional Changes Proposed by the Council During the Hearing Sessions (Not Advertised)			
Terminology changes			
PC1	Page 3 and page 11 - inset box - line 1	3.9-12	Delete 'Bedford town centre'. Replace by 'central Bedford'.
PC2	Page 4 bullet 3 of 'Key proposals include:'	3.9-12	Delete 'within the town centre'.
PC3	Paragraph 1.13 line 4	3.9-12	Delete 'town centre'. Replace by 'Town Centre Area Action Plan'.
PC4	Paragraph 1.14	3.9-12	Delete sentences 1 and 2. Replace by: 'This document explains how the council thinks the town centre and the remainder of the Plan Area should change in the

			period between now and 2021. It sets out the council's vision for the town centre and the remainder of the Plan area and turns this into a series of linked objectives and policies.'
PC5	Paragraph 3.3 lines 2 and 3	3.9-12	Delete 'in the town centre'.
PC6	Page 14 'Strategic Policy' line 1	3.9-12	Insert 'and remainder of the Plan Area' after 'centre'.
PC7	Paragraph 3.5 line 1	3.9-12	Delete 'Within Bedford town centre,'. Replace 'this' by 'This'.
PC8	Paragraph 4.18 line 2	3.9-12	Delete 'in the town centre'.
PC9	Paragraph 4.25 line 4	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.
PC10	Paragraph 5.1	3.9-12	Delete 'within the town centre' in line 3. Replace 'for the town centre' by 'of the Town Centre Area Action Plan' in line 4.
PC11	Paragraph 5.3	3.9-12	Delete 'within the town centre' in line 1. Delete 'in the town centre and' from bullet 5.
PC12	Paragraph 5.4 line 1	3.9-12	Insert 'and around' after 'in'.
PC13	Paragraph 5.11 line 4	3.9-12	Delete 'through the town centre'.
PC14	Paragraph 6.15 line 3	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.
PC15	Policy TC1	3.9-12	Insert 'A number of general policies apply to those parts of the Plan Area which lie outside the designated Town Centre (see paragraph 7.1).' after Policy TC1
PC16	Paragraph 6.20 line 4	3.9-12	Delete 'of the town centre'.
PC17	Policy TC15 iv)	3.9-12	Delete 'town centre'. Replace by 'townscape'.
PC18	Paragraph 6.24	3.9-12	Delete 'within the town centre' from line 3 and 'for the town centre' from line 4.
PC19	Text following Policy TC22 line 1	3.9-12	Delete 'in the town centre'.
PC20	Paragraph 6.31 line 1	3.9-12	Delete 'Town centre'. Replace 'development' by 'Development'.
PC21	Policy TC25	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.
PC22	Policy TC26	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.
PC23	Policy TC27	3.9-12	Replace 'the' by 'existing' in line 1 and delete 'of Bedford town centre' from line 2.
PC24	Policy TC31	3.9-12	Delete 'in the town centre'.
PC25	Page 51 3 rd bullet of 'Shop Fronts and Advertisements'.	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.
PC26	Policy TC33	3.9-12	Delete 'within the town centre' from lines 1 and 6.
PC27	Policy TC35	3.9-12	Delete 'Within the town centre' from line 1. Replace 'where' by 'Where'.
PC28	Paragraph 7.1	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.
PC29	Policy TC39	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.

PC30	Paragraph 7.3 line 1	3.9-12	Delete 'within the town centre'. Insert 'the' after 'impact of'.
PC31	Paragraph E.1 line 1	3.9-12	Delete 'within the town centre'.
PC32	Paragraph E.3	3.9-12	Delete 'to the town centre'.
PC33	Paragraph E.12 line 1	3.9-12	Delete 'within the town centre'.
PC34	Paragraph E.18 lines 1 and 4	3.9-12	Delete 'for the town centre'.
PC35	Paragraph E.25 line 3	3.9-12	Delete 'within the town centre'.
PC36	Paragraph E.26 line 1	3.9-12	Delete 'within the town centre'.
PC37	Paragraph E.29 line 1	3.9-12	Delete 'Within the remaining parts of the town centre'. Replace by 'Elsewhere'.
PC38	Paragraph F.1 line 1	3.9-12	Insert 'and remainder of the Plan Area' after 'town centre'.
PC39	Paragraph F.2 line 1	3.9-12	Delete 'within the town centre'.
PC40	Appendix G Table 8 Existing Parking Provision	3.9-12	Delete '(Provision within the Town Centre)' from column 1 row 10 (see also MC17)
PC41	Appendix G Table 8 Future Parking Provision	3.9-12	Delete '(Provision within the Town Centre)' from column 1 row 8 (see also MC17)
PC42	Paragraph H.1 lines 1 and 2	3.9-12	Delete 'of the town centre'.
PC43	Appendix I	3.9-12	Insert 'Plan Area: the area encompassed by the Area Action Plan boundary.' After the definition of 'Permeability'.
Other changes			
PC44	Policy TC7 vii)	3.67-69	Insert '(see Policy TC20)' after 'improvements'.
PC45	Policies TC18-20 and paragraphs 6.26-28	3.67-69	<p>Delete paragraphs 6.26-28 and Policies TC18-20 and replace by:</p> <p>'The area action plan pursues a strategy that seeks to satisfy a number of objectives: -</p> <p>(i) Mitigation of traffic impacts</p> <p>Notwithstanding the effects of encouraging more sustainable travel demand management and diverting unnecessary movement away from the town centre, there will inevitably be increases in traffic flow at certain times of the day and in certain locations. These effects can be mitigated by network improvements. The Borough Council, County Council and Renaissance Bedford have instructed consultants to carry out a further transportation study in order to refine the transport strategy set out in the Bedford Town Centre Development Framework Study and to provide a more detailed assessment of what is needed and when. Policies TC18, 19 and 20 set out the current position.</p>
Policy TC 18 - Junction/Network Improvements 2006-2011			

			<p>The following proposals will be pursued through the Local Transport Plan and other means (including developer contributions where they are required to facilitate the development of specific sites):-</p> <p>Developer Funded Schemes</p> <ul style="list-style-type: none"> • Realignment of Greyfriars • Midland Road/ Greyfriars junction • River Street/ Greyfriars junction • Improvements to Hassett Street/Beckett Street/Gwyn Street, Brace Street and Bromham Road • Priory Street to be one-way northbound • Greenhill Street - closure <p>LTP/Other Funded Schemes</p> <ul style="list-style-type: none"> • Town Centre Traffic Management & Control System. • Ford End Road/Prebend Street junction • Right turn into the Embankment 	
			<p>The Bedford Town Centre Development Framework Study Transportation Strategy identified that post 2011, there was a need to increase river crossing capacity and proposed the Batts Ford bridge. A subsequent transportation study has shown that the new river crossing is necessary in conjunction with the completion of the Western Bypass to enable the detrafficking of the High Street. In addition, when combined with other measures, the bridge has potential to incorporate bus priority links, reduce congestion and to improve accessibility to the town centre for non car modes.</p> <p>Further studies will be commissioned to look at the detailed design and feasibility of the new river crossing. This will determine the function of this new link in the network and its role in terms of providing public transport priority rather than providing roadspace for general traffic. Its role in facilitating access by park and ride services to the new bus station will also be assessed.</p>	
			<p>Policy TC 19 - Network Improvements post 2011</p> <p>Successful regeneration activity will require a new river crossing at Batts Ford linking Kingsway to River Street with or without other network improvements including the safeguarded Prebend Street relief road as shown on the Proposals Map. In order to achieve this strategy, a corridor (as shown on the Proposals Map) will be safeguarded to accommodate a new river crossing and approach roads linking River Street and Kingsway. This scheme will be pursued as an integral part of a major bid through the Local Transport Plan process and would also be likely to require: -</p> <ul style="list-style-type: none"> • improvements to the Kingsway/Cauldwell Street junction and the River Street/Horne Lane junction; • reversion of Horne Lane, River Street and Kingsway to two-way operation; • introduction of an access restriction point at the junction of Horne Lane and St Paul's Square (for eastbound traffic); • bus priority measures where feasible. 	
			<p>The details of the improvement measures will subsequently need to be worked up as individual planning applications come forward (see also Policy TC41). This is a development control matter that will be managed through the preparation of transport assessments and the negotiation of Section 106 Agreements. Achieving suitable access to the development sites by all modes of transport is a material consideration.</p>	

			<p>Policy TC 20 - Development Related Network Improvements</p> <p>At this stage it would appear that the Bedford Town Centre West redevelopment will require developer funded improvements as follows:-</p> <ul style="list-style-type: none"> • Realignment of Greyfriars • Midland Road/ Greyfriars junction • River Street/ Greyfriars junction • Improvements to Hassett Street/Beckett Street/Gwyn Street, Greenhill Street, Brace Street and Bromham Road • Priory Street to be one-way northbound <p>Developer funded network improvements may also be required in association with the development of other town centre sites.</p> <p>In addition improvements to the Ashburnham Road/Bromham Road junction are to be undertaken in association with the development of Land North of Bromham Road (Local Plan Policy H8).'</p>
PC46	Appendix C Table 5	3.86-88	Delete Table 5. Replace by up-dated Table 5 (see Annex B)
PC47	Appendix C	3.86-88	Insert up-dated version of Table 5a after Table 5 (see Annex B)
PC48	Appendix D Table 6	3.86-88	Delete Table 6. Replace by revised Table 6 (see Annex C)
Changes Recommended by the Inspector			
IC1	2 nd bullet between Policies TC2 and TC3	3.21-28	<p>Delete 2nd bullet between Policies TC2 and TC3. Replace by:-</p> <p>'The Town Centre Area Action Plan makes provision for a total of 31,200 sq.m. of new retail floorspace on the Bedford Town Centre West, Riverside Square and Castle Lane sites. The Council acknowledges that the Plan does not make allocations for retail development which, on their own, would be sufficient to meet the maximum requirements set out in Policy TC2. However, the allocations which have been made should be seen as the first phase of an on-going process. In this first phase the Council's strategy is to focus efforts on the delivery of these 3 main sites. Given the lack of significant retail investment in the town centre in the last 30+ years it is imperative that the current window of opportunity is not lost. The development of the 3 main sites will significantly enhance Bedford's attractiveness for further development.</p> <p>To take the Plan's town centre regeneration effort forward to 2016 and possibly beyond, the Council will undertake a thorough review of its strategy for the provision of retail floorspace before the end of 2011 in the light of, amongst other things:</p> <ul style="list-style-type: none"> • progress on the retail allocations contained in the TCAAP; • predictions of additional retail floorspace requirements made in the light of growth in the retail catchment area; and, • the potential for the existing, or an expanded, PSA to deliver any additional requirements for retail floorspace. <p>As part of the review, the Council will identify sites and opportunities to meet any predicted requirements. Initially, the</p>

			focus for the search for additional sites and opportunities is likely to be on the existing PSA and the land to the north but, depending on circumstances, it may be that other sites and opportunities for development within the plan area will also be included.'
IC2	Policy TC41	3.29	Delete criterion 4 and replace by: '4. Except in the case of extensions to existing premises involving 200 m2 or less of additional floorspace, where retail uses are proposed on sites not allocated for retail purposes which lie outside the Primary Shopping Area but within the Plan Area, an assessment of need and a sequential test of the proposed location will be required in line with the advice contained in PPS6.'
IC3	Paragraph C.2	3.21-28	Delete text after 'A MORE COMPETITIVE AND COMMERCIALY ACTIVE CENTRE'. Replace by: - 'The Strategic Policy and Policies TC1-TC6 are general policies which will be implemented through the development control process as and when proposals arise. The effectiveness of these policies will depend upon the scale of development activity and will be assessed through monitoring. The retail floorspace provision target set out in Policy TC2 has not been fully allocated in the plan. The plan concentrates on the delivery of three key sites expected to deliver 31,200 m2 of retail floorspace. If monitoring indicates that the amount of additional retail floorspace allocated on the three sites is not likely to be delivered in line with predictions and, in any event, before the end of 2011, the Council will undertake a thorough review of its strategy for the provision of retail floorspace to consider the reasons behind any failure of provision, any need for additional floorspace and the extent of the Primary Shopping Area in order to take the regeneration effort forward to 2016 and possibly beyond.'
Minor Changes Not Affecting Soundness of the DPD			
Terminology changes			
MC1	Page 13 Figure 1	3.8	Amend key by deleting 'core shopping area'. Replace by 'primary shopping area'.
MC2	Page 32 paragraph 6.10 (i)	3.8	Delete 'core retail area'. Replace by 'primary shopping area'.
MC3	Page 34 paragraph 6.16	3.8	Delete 'town centre core'. Replace by 'primary shopping area'.
MC4	Page 35 1 st bullet after Policy TC2	3.8	Delete 'core area'. Replace by 'primary shopping area'.
MC5	Page 35 1 st bullet after Policy TC3	3.8	Delete 'main shopping core'. Replace by 'primary shopping frontages'.
MC6	Page 37 1 st bullet after paragraph 6.20	3.8	Delete 'the core'. Replace by 'the area'.
MC7	Page 64 Figure 4	3.8	Delete 3 references to 'shopping core' in the Key. Replace by 3 references to 'primary shopping area'.
MC8	Appendix I	3.8	Add 'Retail Core: see primary shopping area' to Glossary.
Other changes			
MC9	Strategic Policy page 14	3.79	Delete 'taxi' in bullet 8 and replace by 'taxis/private hire vehicles'.
MC10	After page 17	3.53	Insert the following text: ' SHIRE HALL AND BANK BUILDING SITE

			<p>This site includes the Shire Hall which was completed by Alfred Waterhouse in 1881, several listed buildings on the south side of St. Paul's Square and the vacant Bank building site which is an important gateway location on the southern approach to the town centre. The listed buildings have been empty for many years and need to be brought back into use in order to secure their future.</p> <p>There is scope to expand the existing operation of the courts in order to create a regional justice centre. This will also help to secure the future of the Shire Hall building.</p> <p>Any scheme will need to be sensitively designed having regard to the heritage issues, the historic fabric and the prominence of the site. It is important that any development fronts on to St. Paul's Square, High Street and the river frontage.'</p>		
MC11	Policy TC7 iv)	3.79	Delete 'taxi' and replace by 'taxis/private hire vehicles'.		
MC12	Policy TC13 iii)	3.79	Delete 'taxi' and replace by 'taxis/private hire vehicles'.		
MC13	Policy TC23	3.78, 3.79	<p>Delete 'and reviewing the pick-up and setting down points around the town centre' from the first bullet under 'Service Improvements'.</p> <p>Delete 'and taxis' from the first bullet under 'Bus Station' and replace by 'and taxis/private hire vehicles'.</p>		
MC14	Policy TC24	3.73-74	<p>Insert the following additional paragraph of text before Policy TC24:</p> <p>'The basis of this parking strategy is set out in the Bedford Town Centre Development Framework Study. It explains that in developing the parking strategy for Bedford town centre, an attempt has been made to strike the right balance between provision and management (including the charging regime) and the alternatives offered by public transport, walking and cycling.</p> <p>The Framework Study identifies the following elements that together will secure the parking strategy</p> <ul style="list-style-type: none"> • Management of the overall parking stock so that the number of spaces available for public use at times of peak demand is in line with newly identified maximum standards for the town centre that are consistent with or tighter than PPG13 maximum standards; • Recognising the opportunity to control the overall supply of public parking through the redevelopment of existing surface car park sites; • Increased public car parking charges that are complementary to the transport strategy but at the same time sit comfortably with charging levels in nearby (and competing) town centres; • A move towards consistent charging across all town centre car parks that are available for public use, with charges set to deter long stay commuter parking; • Shared parking provision for different land uses in line with PPG13; • Provision of on-plot parking at less than PPG13 maximum standards with flexible management arrangements offering the potential to tighten standards further over time in line with the success of the town centre; • Provision of a replacement multi-storey car park on the bus station site that is designed to the 'Gold Standard' of safety and security; • New park and ride facilities in appropriate locations; • A provision of conveniently located disabled parking spaces within all car parks; • Strict on-street parking controls within the town centre and its hinterland.' 		
MC15	Table 2 before Policy TC25	3.64	Delete Table 2 and replace by: -		
			Site	Residential Capacity (exclusive of	Delivery Period

			demolitions)	
			Policy TC7 – New Retail Quarter – Bedford Town Centre West	300
			Policy TC9 – New Cultural Quarter – Castle Lane	104
			Policy TC10 – Cultural Quarter – Cecil Higgins Art Gallery & Bedford Museum	20
			Policy TC11 – Riverside Square	155
			Policy TC13 – Station Quarter – Bedford Station	180
			Policy TC15 – Kingsway Quarter	300
			Policy Tc16 – Land at Lime Street	10
			Policy TC17 – Progress Ford, The Broadway	85
			Total capacity	1154
MC16	Policy TC41	3.65	Add additional criterion to read: 'Where residential use is proposed, evidence in relation to air quality to demonstrate that a satisfactory residential environment can be achieved.'	
MC17	Appendix G Table 8	3.76	In Table 8 - Existing Parking Provision insert the following row after row 9 'St Peter's Street' : 'Bedford Station 613'. Delete '3315' from column 2 row 10 and replace by '3928' Delete '3795' from column 2 row 12 and replace by '4408' In Table 8 - Future Parking Provision insert the following row after row 7 'St Peter's Street': 'Bedford Station 900 Provisional figure – to be determined at planning application stage' Delete '3149' from column 2 row 8 and replace by '4049' Delete '4879' from column 2 row 13 and replace by '5779'	
MC18	Policy TC27	4.1	In iv) delete 'property boundaries' and replace by 'historic boundaries, spaces between buildings and the public realm'. Delete final sentence and replace by: 'Development proposals will need to demonstrate how the historical context has been addressed as appropriate. In areas of archaeological potential, archaeological assessment will be required and remains should be preserved in situ. Where this is not justified or feasible excavation, recording and interpretation will be required.'	
MC19	Policy TC36	4.1	Delete part vi) and replace by: 'vi) Whether conservation, heritage, biodiversity and green space issues have been properly addressed;'. Replace '.' At end of part vii) and replace by ';'. After part vii) insert: 'viii) The suitability of the development in terms of crime prevention and community safety.'	
MC20	Policy TC41	4.1	Add additional criterion to read: 'An appraisal to establish existing biodiversity value of the site and to explain how development proposals will affect or enhance it.' In 7 insert 'and other important archaeological remains' after 'monuments'. Replace 'and' by ',' before 'scheduled'.	

Bedford Borough Council Town Centre Area Action Plan – Inspector's Report

Annex B

**Recommended changes to Appendix C of the Plan– see PC46
and PC47 of Annex A to this Report.**

(i) Up-dated Table 5

(ii) Table 5a

No	Policy/Proposal	Delivery Agent	2006 Q1 Q2 Q3 Q4	2007 Q1 Q2 Q3 Q4	2008 Q1 Q2 Q3 Q4	2009 Q1 Q2 Q3 Q4	2010 Q1 Q2 Q3 Q4	2011 Q1 Q2 Q3 Q4	2012 Q1 Q2 Q3 Q4	Later Years	Funding	Public Funds
A MORE COMPETITIVE RETAIL AND COMMERCIALY ACTIVE CENTRE												
TC1	Definition of Town Centre	BBC									Private	
TC2	Improving retail offer	BBC									Private	
TC3	Primary Shopping Area/Frontages	BBC									Private	
TC4	Secondary Shopping Frontages	BBC									Private	
TC5	Office development	BBC									Private	
TC6	Office development sites	BBC									Private	
A MORE STRUCTURED AND DISTINCTIVE CENTRE												
TC7	Bedford Town Centre West	St Mod		P ***							Private	
TC8	Retail re-investment & High Street Initiative	BBC/BTCC									Mixed	
TC9	Castle Lane	CPD	P #								Mixed	GAF2
TC10	Cecil Higgins Art Gallery & Bedford Museum	BBC/BTCC									Public	GAF2/HLF
TC11	Riverside Square	MCD		P #							Private	
TC12	Shire Hall & Bank Building Site	DCA									Private	
TC13	Bedford Station	BBC/RB		P							Mixed	GAF2/GAF3
TC14	St Mary's Quarter	BCC/BC									Private	
TC15	Kingsway Quarter	tba									Private	
TC16	Land at Lime Street	tba									Private	
TC17	Progress Ford	tba		P *** P							Private	
A BETTER CONNECTED AND MORE ACCESSIBLE CENTRE												
TC18	Junction/Network improvements 2006-2011	BCC									Mixed	LPT2
TC19	Network improvements post 2011	BCC									Public	LPT2/3
TC20	Development related network improvements	St Mod									Private	
TC21	Walking and cycling routes	BCC									Mixed	LPT2
TC22	Pedestrian connections	BCC									Mixed	LPT2
TC23	Public transport interchange/services	BCC									Mixed	LPT2
TC24	Parking	BCC									Public	LPT2
A MORE LIVEABLE AND ATTRACTIVE CENTRE												
TC25	Housing mix	BBC									Mixed	
TC26	Living Over the Shop	BBC									Mixed	
TC27	Heritage	BBC									Mixed	
TC28	Tourism	BBC									Mixed	
TC29	Riverside frontages	BBC									Mixed	
TC30	Riverside development	BBC									Mixed	
TC31	Biodiversity	BBC									Mixed	
TC32	Public spaces	BBC									Mixed	
TC33	Shop fronts	BBC									Mixed	
A WELL MANAGED CENTRE												
TC34	Town centre management	BTCC/BBC									Mixed	BID
TC35	Town centre amenity	BBC									Mixed	
GENERAL POLICIES												
TC36	Redevelopment proposals	BBC									Mixed	
TC37	Leisure uses	BBC									Mixed	
TC38	Compulsory purchase	BBC/BCC									Private	
TC39	Urban design principles	BBC									Mixed	
TC40	Developer contributions	BBC									Mixed	
TC41	Submission requirements	BBC									Mixed	

P Planning Application submitted ******* Resolution to grant planning permission subject to S106 **#** Planning Permission granted

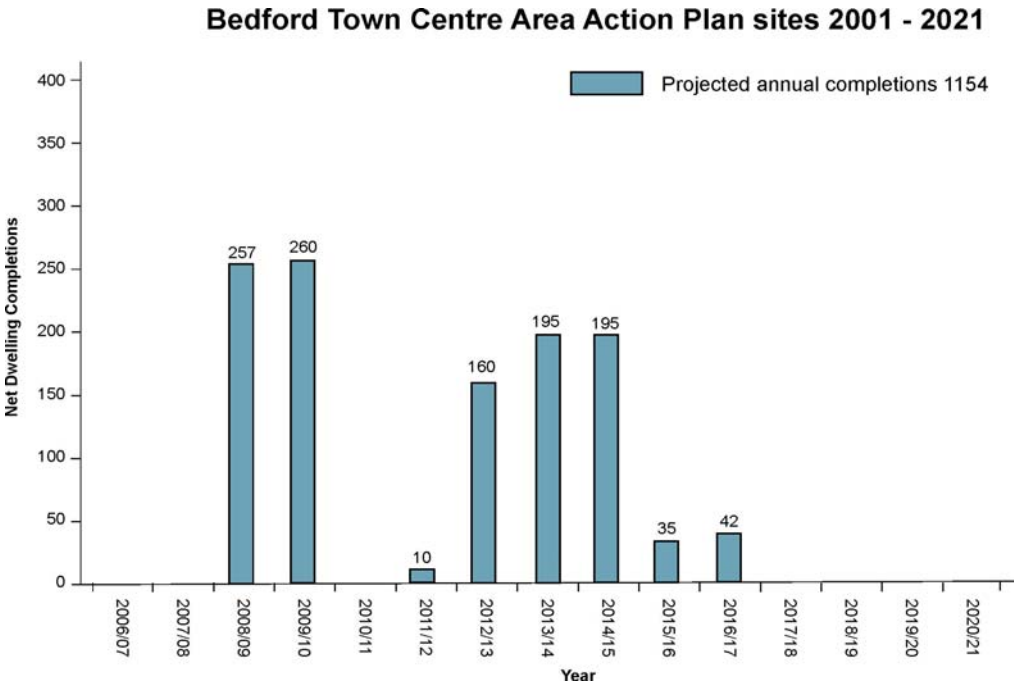
	Implementation as and when the opportunity arises
	Feasibility, planning approvals, other consents and site assembly
	Compulsory purchase order
	Detailed design and procedures
	Construction period

BBC	Bedford Borough Council	DCA	Dept of Constitutional Affairs
BC	Bedford College	MCD	Midland & City Developments Ltd
BCC	Bedfordshire County Council	RB	Renaissance Bedford (LDV)
BTCC	Bedford Town Centre Company	St Mod	St Modwens Developments Ltd
CPD	Complex Development Projects Ltd	tba	to be announced

BID	Business Improvement District
GAF2	2nd round of Growth Area Funding
HLF	Heritage Lottery Fund
LPT2	Local Transportation Plan 2006-2011
LTP3	Local Transportation Plan 2011-2016
PFI?	Private Finance Initiative

REVISED PEC30 – Appendix C Housing Trajectory Town Centre

Table 5a



Bedford Borough Council Town Centre Area Action Plan – Inspector’s Report

Annex C

**Recommended changes to Appendix D of the Plan– see PC48
of Annex A to this Report.**

Up-dated Table 6

Bedford Borough Council Town Centre Area Action Plan – Inspector’s Report

Revised Table 6

DPD objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
A MORE COMMERCIALY ACTIVE AND COMPETITIVE CENTRE AND A MORE STRUCTURED AND DISTINCTIVE CENTRE				
1. To provide a framework for the regeneration of the town centre	Strategic Policy TC36: Redevelopment Proposals	Overall Plan targets: Retail: Up to 47,000 sq.m. net additional comparison goods retail floorspace by 2016 (30,000 sq.m. net by 2011) Office: Sites TC13, TC15 and TC16 Leisure: Site TC7	C4a Amount of completed retail, office and leisure development	<p>C4a: Retail – Review the retail capacity study in 2011. If 30,000 sq.m. net is delivered before 2011 review the retail capacity study early. If 30,000 sq.m. net not delivered by 2011, take account of the reviewed retail capacity study and consider the need for alternative sites using sequential approach.</p> <p>Office: If development on sites TC13, TC15 and TC16 are not on target to commence construction (see table 5) consider alternative office site allocations in accordance with Core Strategy Policy CP5</p> <p>Leisure: Monitor leisure delivery on TC7 site on a 2 yearly basis. If TC7 site</p>

DPD objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
				unlikely to deliver leisure development in line with target date for the commencement of construction (see table 5) and phasing agreed in the planning permission, consider alternative site allocations
2. To sustain and enhance the vitality and viability of the town centre as a whole whilst promoting reinvestment in the existing retail centre including the High Street	<p>Strategic Policy</p> <p>TC2: Improving the retail offer</p> <p>TC3: Primary shopping area and primary shopping frontages</p> <p>TC4: Secondary shopping frontages</p> <p>TC5: Office Development</p> <p>TC7: New Retail Quarter – Bedford Town Centre West</p> <p>TC8: New Retail Quarter – Retail reinvestment and the High Street</p> <p>TC9: Cultural Quarter – Castle Lane</p> <p>TC11 – Riverside Quarter – Riverside Square</p> <p>TC36: Redevelopment Proposals</p> <p>TC37: Leisure Uses</p>	<p>TC2 target: Provision for up to 47,000 sq.m. net additional comparison goods retail floorspace by 2016 (30,000 sq.m. net by 2011) and up to 6,000 sq.m. net additional convenience goods retail floorspace by 2011 within the town centre (primarily within Bedford Town Centre West and thereafter the Primary Shopping Area)</p> <p>TC7 Target: Provision of up to 30,000 sq.m. net retail floorspace at Bedford Town Centre West by 2015/16</p> <p>TC9 target: up to 600 sq.m. net retail floorspace by 2008/09</p> <p>TC11 target: up to 600 sq.m. net retail floorspace by 2009/10</p>	<p>C4b Amount of completed retail, office and leisure development in town centres</p> <p>C4a Amount of completed retail, office and leisure development</p>	<p>C4b: If the identified retail floorspace at the three key sites (policies TC7, TC9 and TC11) is not likely to be delivered or is delivered more quickly than expected (see timescales in table 5 for when construction expected to commence), an updated retail capacity study should be undertaken to consider the reasons for this, to review the amount of additional floorspace likely to be needed and to consider the scope if appropriate for expansion of the Primary Shopping Area. Alternative site allocations for retail should be made if necessary and having regard for the updated retail capacity evidence</p>

DPD objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
				base.
3.To create a more diverse and vital mix of uses including a major increase in the town's retail offer	Strategic Policy TC2: Improving the retail offer TC3: Primary shopping area and primary shopping frontages TC7: New Retail Quarter – Bedford Town Centre West TC8: New Retail Quarter – Retail reinvestment and the High Street TC9: Cultural Quarter – Castle Lane TC11: Riverside Quarter – Riverside Square TC16: Land at Lime Street	Strategic Policy Target: Expand the town centre and improve the town's shopping offer TC2 target: Provision for up to 47,000 sq.m. net additional comparison goods retail floorspace by 2016 (30,000 sq.m. net by 2011) and up to 6,000 sq.m. net additional convenience goods retail floorspace by 2011 within the town centre (primarily within Bedford Town Centre West and thereafter the Primary Shopping Area) TC7 Target: Provision of up to 30,000 sq.m. retail floorspace at Bedford Town Centre West. Provision of mixed use development including leisure, commercial and residential use (300 residential units) by 2015/16 TC9 Target: Provision of 105 residential units and up to 600 sq.m. of retail floorspace and commercial (A3 use) use by 2008/09 TC11 Target: Provision of 155 residential units and up to 600	C4b Amount of completed retail, office and leisure development in town centres	C4b: If the identified retail floorspace at the three key sites (policies TC7, TC9 and TC11) is not likely to be delivered or is delivered more quickly than expected (see timescales in table 5 for when construction expected to commence), an updated retail capacity study should be undertaken to consider the reasons for this, to review the amount of additional floorspace likely to be needed and to consider the scope if appropriate for expansion of the Primary Shopping Area. Alternative site allocations for retail should be made if necessary and having regard for the updated retail capacity evidence base. Office: If development on sites TC13, TC15 and TC16 are not expected to be built by target dates (see timescales in table 5 for when construction

DPD objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
		sq.m. of retail floorspace and commercial (A3 use) development by 2009/10 Overall plan targets: Office: Sites TC13, TC15 and TC16 Leisure: Site TC7		expected to commence), consider alternative office site allocations Leisure: Monitor leisure delivery on TC7 site on a 2 yearly basis. If TC7 site unlikely to deliver leisure development in line with target date (see timescales in table 5 for when construction expected to commence), consider alternative leisure allocations
4. To achieve the successful integration of new development with the existing town centre.	Strategic Policy			
5. To strengthen the economy of the town centre and its role as an employment, administrative and educational centre	Strategic Policy TC5: Office Development TC7: New Retail Quarter – Bedford Town Centre West TC12: Riverside Quarter – Shire Hall and the Bank building site TC13: Station Quarter – Bedford Station TC14: St Mary's Quarter TC15: Kingsway Quarter TC16: Land at Lime Street	TC13 Target: Provision of new office quarter by 2014/15 TC15 Target: Provision of office and public administration uses by 2016/17 TC16 Target: Provision of office development by 2011/12	C1b Amount of floorspace developed for employment by type, in employment or regeneration areas C1c Amount of floorspace developed by employment type, which is on previously developed land C4b Amount of completed retail, office and leisure development in town centres	C1b/c and C4b: If office accommodation is not likely to be delivered on the 3 sites identified (policies TC13, TC15, TC16) in line with the date for commencement of construction in Table 5, further office sites should be sought in accordance with the search sequence set out in Core Strategy policy CP5.

DPD objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
A BETTER CONNECTED CENTRE				
6. To improve access to the town centre through the provision of new public transport interchanges, new highway infrastructure, public transport priority when feasible, the use of park and ride facilities and improved facilities for pedestrians, cyclists, taxis and private hire vehicles. Where and when highway capacity can be increased, priority should be given to modes other than private cars.	<p>Strategic Policy</p> <p>TC7: New Retail Quarter – Bedford Town Centre West</p> <p>TC9: Cultural Quarter, Castle Lane</p> <p>TC11: Riverside Quarter, Riverside Square</p> <p>TC12: Riverside Quarter, Shire Hall and Bank Building site</p> <p>TC13: Station Quarter – Bedford Station</p> <p>TC15: Kingsway Quarter</p> <p>TC18: Junction/network improvements 2006-2011</p> <p>TC19: Network improvements post 2011</p> <p>TC20: Development related network improvements</p> <p>TC21: Walking and cycling routes</p> <p>TC22: Pedestrian connections</p> <p>TC23: Public transport interchange/services</p> <p>TC24: Parking</p>	<p>TC7 Target: Provision of new bus station, revised access, on and off site highway improvements, car and cycle parking, cycle storage</p> <p>TC9 Target: Provision of on and off site highway improvements and cycle parking</p> <p>TC11 Target: Provision of on and off site highway improvements, foot/cycle bridge, foot/cycle routes, cycle parking</p> <p>TC12 Target: Provision of highway improvements and cycle parking</p> <p>TC13 Target: Relocation of the railway station, revised access, car and cycle parking, pedestrian over-bridge</p> <p>TC15 Target: Improved cycle/walking connections</p> <p>TC17 Target: On and off site highway improvements (as required)</p> <p>TC18 Target: Developer funded schemes</p>	<p>L3 Level of proposed transport infrastructure set out in the RSS and LTP2 that has been achieved</p> <p>Junction improvements completed</p> <p>Number of new river crossings delivered</p> <p>Park and ride facilities operational</p> <p>Cycle improvements achieved</p> <p>Traffic levels</p> <p>Policies TC7, TC9, TC11, TC12, TC13, TC15 and TC17 include reference to on/off site highway improvement measures. Transport Assessments for individual planning applications will consider what specific improvements may be required as a consequence of the proposed development. Delivery of the other</p>	<p>Policies TC18 and TC19 – The precise timing of the improvements (not including developer funded schemes – see TC20 below) will be informed by the Stage 2 Transportation Study in 2008/09. Delivery of the improvements will be monitored against the recommendations in the study. If improvements are not being delivered, the reasons for this will be established and alternative means of delivery will be sought.</p> <p>Policy TC20 – Delivery will be monitored against the S106 agreement and agreed phasing. Any delivery issues will relate to the TC7 site (see C4b trigger above).</p> <p>Policies TC21 and TC22 – The routes are to be delivered via developer contributions and LTP funding and delivery monitored on an annual</p>

DPD objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
		<ul style="list-style-type: none"> • Realignment of Greyfriars • Midland Road/Greyfriars junction • River Street/Greyfriars junction • Improvements to Hassett Street/ Beckett Street/ Gwyn Street, Brace Street and Bromham Road • Priory Street to be one-way northbound • Greenhill Street – closure LTP/Other funded schemes • Town Centre Traffic Management & control system • Ford End Road/ Prebend Street junction • Right turn into the Embankment <p>TC19 Target: Provision of new river crossing at Batts Ford linking Kingsway and River Street and associated road network improvements</p> <p>TC20 Target: Developer funded improvements related to the TC7 site:</p> <ul style="list-style-type: none"> • Realignment of Greyfriars • Midland Road/Greyfriars junction • River Street/Greyfriars junction 	<p>transport measures in the policies (walking routes, cycle routes etc) will be secured through the planning applications.</p>	<p>basis. If routes are not being delivered, the reasons for this will be established and alternative means of delivery will be sought.</p> <p>Policy TC23 – Delivery of the service improvements listed will be delivered via developer contributions and LTP/CIF/GAF funding. The precise timing of the improvements will be informed by the Stage 2 Transportation Study in 2008/09. Delivery of the improvements will be monitored against the recommendations in the study.</p>

DPD objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
		<ul style="list-style-type: none"> • Improvements to Hassett Street/ Beckett Street/ Gwyn Street, Brace Street and Bromham Road • Priors Street to be one-way northbound <p>TC21 Target: Promote walking and cycle routes at:</p> <ul style="list-style-type: none"> • Midland Road corridor (for pedestrians and cyclists) • North-south spine linking the bus station redevelopment via the proposed Landmark Bridge to Kingsway (for pedestrians and cyclists) • River Street corridor • Routes along the river • East west route through Bedford Town centre West (for pedestrians and cyclists) • High Street corridor for north-south route through the town centre (for pedestrians and cyclists) • The Grove, Newnham Street and Castle Lane <p>TC22 Target: Improvement in the number and quality of connections including:</p> <ul style="list-style-type: none"> • connections within the centre including between the existing 		

DPD objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
		<p>centre and Castle Lane and Bedford Town Centre West;</p> <ul style="list-style-type: none"> connections between the centre and river corridor, including provision of new foot/cycle bridges; connections between the centre and railway station <p>TC23 Target: Retention of a bus station, improved bus/rail interchange at the railway station and expansion of park and ride facilities</p>		
<p>7. To improve the number and quality of the connections within the town centre and between the centre and the river and railway station.</p>	<p>Strategic Policy TC11: Riverside Quarter – Riverside Square TC13: Station Quarter – Bedford Station TC14: St Mary's Quarter TC15: Kingsway Quarter TC21: Walking and cycling routes TC22: Pedestrian connections TC29: Riverside Frontages TC30: Riverside development</p>	<p>TC11 Target: Provision of new foot/cycle bridge across the river</p> <p>TC13 Target: Relocation of the railway station</p> <p>TC21 Target: Promote walking and cycle routes at:</p> <ul style="list-style-type: none"> Midland Road corridor (for pedestrians and cyclists) North-south spine linking the bus station redevelopment via the proposed Landmark Bridge to Kingsway (for pedestrians and cyclists) River Street corridor Routes along the river East west route through Bedford Town centre West (for 	<p>Number of new river crossings completed</p> <p>Number of pedestrian/cycle connections improved</p> <p>Traffic levels</p>	<p>Policies TC11 and TC13 – development of the foot/cycle bridge and the relocation of the railway station will be monitored against the phasing agreed in the relevant planning permissions.</p> <p>Policies TC21 and TC22 – The routes are to be delivered via developer contributions and LTP funding and delivery monitored on an annual basis. If routes are not being delivered, the reasons for this will be established and alternative</p>

DPD objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
		<p>pedestrians and cyclists)</p> <ul style="list-style-type: none"> • High Street corridor for north-south route through the town centre (for pedestrians and cyclists) • The Grove, Newnham Street and Castle Lane <p>TC22 Target: Improvement in the number and quality of connections including:</p> <ul style="list-style-type: none"> • connections within the centre including between the existing centre and Castle Lane and Bedford Town Centre West; • connections between the centre and river corridor, including provision of new foot/cycle bridges; • connections between the centre and railway station 		means of delivery will be sought.
8. To achieve a significant growth in town centre living in order to enhance the vitality and viability of the centre	<p>Strategic Policy</p> <p>TC7: New Retail Quarter – Bedford Town Centre West</p> <p>TC8: New Retail Quarter – Retail reinvestment and the High Street</p> <p>TC9: Cultural Quarter – Castle Lane</p> <p>TC10: Cultural Quarter – Cecil Higgins Art Gallery & Bedford Museum</p> <p>TC11: Riverside Quarter – Riverside Square</p>	<p>TC7 Target: Provision of 300 residential units</p> <p>TC9 Target: Provision of 105 residential units</p> <p>TC10 Target: Provision of 20 residential units</p> <p>TC11 Target: Provision of 155 residential units</p>	Number of units of housing completed in the plan area	If actual housing delivery varies by more than 20% outside expected delivery (see Appendix C Housing Trajectory) reasons for this should be established and appropriate responses considered. This could include a review of town centre housing allocations. Delivery against the plans' housing requirement of

DPD objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
	TC13: Station Quarter – Bedford Station TC15: Kingsway Quarter TC16: Land at Lime Street TC17: Progress Ford the Broadway TC26: Living over the shop	TC13 Target: Provision of 180 residential units TC15 Target: Provision of 300 residential units TC16 Target: Provision of 10 residential units TC17 Target: Provision of 85 residential units Overall target: 1155 residential units		1155 will be monitored on a 5 year rolling basis.
9. To provide affordable housing in a managed town centre reflecting the needs of the community with the aim of securing a mixed and balanced town centre community	Strategic Policy TC7: New Retail Quarter – Bedford Town Centre West TC8: New Retail Quarter – Retail reinvestment and the High Street TC9: Cultural Quarter – Castle Lane TC11: Riverside Quarter – Riverside Square TC13: Station Quarter – Bedford Station TC15: Kingsway Quarter TC16: Land at Lime Street TC17: Progress Ford the Broadway TC25: Housing Mix TC26: Living over the shop	TC7 Target: A proportion of the 300 residential units TC9 Target: A proportion of the 105 residential units TC10 Target: A proportion of the 20 residential units TC11 Target: A proportion of the 155 residential units TC13 Target: A proportion of the 180 residential units TC15 Target: A proportion of the 300 residential units TC16 Target: A proportion of the	C2d Affordable housing completions	If actual housing delivery varies by more than 20% outside expected delivery (see Appendix C Housing Trajectory) reasons for this should be established and appropriate responses considered. This could include a review of town centre housing allocations. Delivery against the plans' housing requirement of 1155 will be monitored on a 5 year rolling basis.

DPD objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
		10 residential units TC17 Target: A proportion of the 85 residential units Overall target: 1155 residential units		
10. To protect, promote and enhance Bedford's natural and built heritage, cultural attraction and role as a tourist destination as an integral part of the strategy to regenerate the town centre	Strategic Policy TC8: New Retail Quarter – Retail reinvestment and the High Street TC9: Cultural Quarter – Castle Lane TC10: Cultural Quarter – Cecil Higgins Art Gallery & Bedford Museum - refurbishment TC11: Riverside Quarter – TC12: Station Quarter – Shire Hall and the Bank building site – retention and refurbishment of listed buildings TC14: St Mary's Quarter – potential for a mini marina TC27: Heritage TC28: Tourism		L20: Quality of new development in terms of design and landscaping and respecting local character	
11. To achieve quality urban design with high quality materials and finishes	TC36: Redevelopment proposals TC39: Urban design principles		L20: Quality of new development in terms of design and landscaping and respecting local character	
A WELL MANAGED TOWN CENTRE				
12. To create a town centre which is safe, attractive and in which people will want to live,	Strategic Policy TC32: Public spaces TC34: Town Centre Management TC35: Town Centre Amenity		L20: Quality of new development in terms of design and landscaping and respecting local character	

DPD objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
shop, work and spend their leisure time	TC37: Leisure Uses			
13. To achieve high quality public realm improvements including provision for management and maintenance	Strategic Policy TC8: New Retail Quarter – Retail reinvestment and the High Street TC9: Cultural Quarter – Castle Lane TC11: Riverside Quarter – Riverside Square TC15: Kingsway Quarter TC17: Progress Ford the Broadway TC30: Riverside development TC32: Public spaces TC36: Redevelopment proposals		Number of new public spaces/existing public spaces improved	
14. To ensure that new development and other partner agencies contribute to the delivery of the council's strategy for the town centre as a whole, including the provision of infrastructure	TC20: Development related network improvements TC21: Walking and cycle routes TC40: Developer contributions	TC20 Target: Developer funded improvements related to the TC7 site: <ul style="list-style-type: none"> • Realignment of Greyfriars • Midland Road/Greyfriars junction • River Street/Greyfriars junction • Improvements to Hassett Street/ Beckett Street/ Gwyn Street, Brace Street and Bromham Road • Priory Street to be one-way northbound 	Level of infrastructure improvements secured by means of condition/S106 agreements on town centre/plan area sites	Policy TC20 – Delivery will be monitored against the S106 agreement and agreed phasing. Any delivery issues will relate to the TC7 site (see C4b trigger above).