

BEDFORD BOROUGH COUNCIL



**PLAN IMPLEMENTATION  
MONITORING REPORT  
2018 – 2019**

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## Summary

This monitoring report is one of a series that monitors various aspects of planning performance throughout the borough. The monitoring reports cover: housing, employment, heritage, major projects, environmental quality and open space, social and community, transport and traffic, infrastructure, and plan implementation. Monitoring reports are available to view <https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/monitoring/>.

The purpose of this report is to set out the progress being made on local development documents that the council is producing. The timetable for the production of local development documents is set out in the Local Development Scheme (LDS), which is updated periodically. The first LDS came into effect in April 2005, with updates being made in September 2007, December 2009, September 2011, October 2012, October 2013, July 2015, March 2016, December 2017 and May 2018.

The LDS is regularly monitored to ensure that it reflects the range and programme of work undertaken by the planning service. All versions of the LDS can be viewed at: [Local Development Scheme \(May 2018\)](#).

## Progress On The Local Plan 2030

### Local Plan 2030

Begun in 2014, Bedford Borough Council continues to prepare a Local Plan to set out how much growth there should be in the borough over the coming years. While current planning policy documents looked forwards to 2021, it became apparent that as work progressed the end date of the plan could possibly be extended from 2032 to 2035.

Following the previous year's invitation for representations, the Borough Council received over 3,500 individual representations concerning the plan.

A key allocation within the plan – one that advanced the period of development towards 2035 was the new garden village at Colworth Park in the north of the Borough, near Santa Pod Raceway.

The success of the development depended on the agreement between the developers and Santa Pod Raceway on noise mitigation measures. Agreement however could not be reached and the scheduled submission of the Local Plan to the Secretary of State was deferred, with the recommendation on the 16<sup>th</sup> May 2018 from the Executive, that the plan be changed and a second period of consultation under Regulation 19 be undertaken.

The loss of the planned Colworth Garden Village development, represented the loss of some 4,500 homes from the Local Plan, subsequently the Local Plan development period has been revised from 2035 to 2030.

The Planning Policy Department delivered the plan to the Executive and Full Council all of whom approved the plan on the 5<sup>th</sup> December 2018.

The plan was submitted to the inspectors and work continued on preparing supporting documentation for the examination. By mid-February 2019 the Inspectors had set provisional dates for the hearing sessions for the examination of the Local Plan. Session dates would run from the end of May 2019 to the last week in June 2019.

On 14 February 2019, the Inspectors set provisional dates for the hearing sessions of the Examination of the Local Plan and details can be viewed on the [Hearing Session](#) pages (29 May 2018 to 27 June 2018).

As a result, a [revised Local Development Scheme](#) (LDS) was published in May 2018, within the monitoring period. This shows that the council intends to publish an amended 'Plan for Submission' in September 2018 which will be subject to a second Regulation 19 consultation. The following chart shows the key milestones for the Local Plan 2030, as set out in the most recent LDS. More information about the plan's timetable can be found on the council's website.

The Local Plan 2030 timetable including Executive, Full Council meetings and respective Consultation Period for the monitoring period is shown below in Table 1.

**Table 1**

2018											
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
				E.				E. C.	C.		E. F/C.

2019											
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
									E. / FC.		

**Table 1 Key**

	Prepare Plan for submission ahead of second Regulation 19 consultation.
	Obtain Executive approval to publish the 'Plan for Submission' and invite representations. Appoint Programme Officer.
	Consider Regulation 19 responses. Report to Executive and Full Council to obtain approval to submit the plan to the Secretary of State.
	Prepare submission documents and submit the plan. Evidence prepared and delivered with submission documents. These two processes ran concurrently. Preparation for the hearing sessions, questions from Inspectors. Then wrote statements and responses.
	Examination (and re-examination) takes place including hearing sessions. Evidence prepared.
	Consult on main modifications (if required) and receive Inspector's report. Adopt the plan.

E = Executive Meeting  
 F/C = Full Council  
 C = Consultation Period

### Performance Indicator – P1: Achieve Plan Adoption Target Date of Dec 2019

Following the Local Plan Examination, a number of modifications are out for consultation and undergoing review. The current schedule expects the modifications to be examined in October 2019, albeit outside of the monitoring period of this report, are expected to lead to the adoption of the Local Plan 2030 by December 2019.

The Bedford Borough Local Plan 2030 was adopted by Full Council on 15 January 2020.

## Local Development Documents Adopted In The Monitoring Period

The Sustainable Drainage Systems (SuDS) supplementary planning document (SPD) was adopted by the Council's Executive on 13<sup>th</sup> February 2018 following a five week public consultation period that ended on 22<sup>nd</sup> December 2017.

Local Plan 2030 Policy 93 states that 'All development proposals must incorporate suitable surface water drainage systems appropriate to the nature of the site.'

Where there is a requirement for Surface Water Drainage (SWD) has been stated in a planning application, note of this is maintained in Uniform. A report of these records can be drawn from Uniform. The table below shows these SWD's by Status of Appeal.

### Performance Indicator – P2: Applications Subject to a Surface Water Drainage Solution (SWD)

Application Count	Status of Appeal	Status Description
4	CLPER	CLPER – Permitted CIL Liable
5	CSLA	CSLA – Permitted CIL Liable and subject to S106 Obligation(s)
49	PER	PER – Permitted
14	REF	REF – Refused
2	RQ	RQ – Details Required (prior Approval). Note, this only applies to people who have made applications required by the Permitted Development Order. In essence it's a decision saying the proposal is not Permitted Development and requires the submission of details as part of a full application for planning permission (Hence 'Details Required').
1	SLA	SLA – Permitted subject to s106 Obligation
<b>Total = 75</b>		

75 planning applications subject to a SWD requirement were processed in the monitoring period, 14 applications were refused after appeal.

## Bedford's Development Plan

Currently Bedford's development plan is made up of several different documents adopted at different times. Those documents are:

- Bedford Local Plan, 2002 (saved policies).
- Bedfordshire & Luton Minerals and Waste Local Plan, 2005.
- Core Strategy and Rural Issues Plan, 2008.
- Bedford Town Centre Area Action Plan, 2008.
- Allocations and Designations Local Plan, 2013.
- Minerals and Waste Local Plan: Strategic Sites and Policies, 2014.

The Local Plan 2030 - adopted in January 2020, will form part of the development plan, replacing many of the policies in these documents, although some, where relevant are retained.

## Neighbourhood Planning

During the monitoring period to 31st March 2019, three neighbourhood plans were undergoing pre-submission consultation. Although no new neighbourhood area applications were received in the monitoring period.

### Performance Indicator – P3: Neighbourhood Planning Outcomes

Name	Neighbourhood Area Designation	Pre-submission Consultation
Bletsoe	1 Jul 2013	15 Sep 2018 to 31 Oct 2018
Carlton and Chellington	17 Mar 2016	July 25 May 2018 to 6 Jul 2018
Oakley	14 November 2013	19 Sep 2018 – 31 Oct 2018

Local plan groups have one year from adoption of the local plan to provide their plan. Otherwise the council will implement the Local Plan in that area. Further information on the role of neighbourhood planning can be found [here](#).

Planning permission will be granted for large-scale (>100kW) wind and solar energy development where proposals are within the broad locations shown on Figure 13 Pg. 102.

## Renewable Energy – Policy 56 - Broad Locations and General Impact

Proposals for development involving the provision of renewable and/or low carbon energy generation, including community energy projects, will be supported, subject to the acceptability of their wider impacts.

### Performance Indicator – P4: Renewable Energy (Solar Panels) Planning Applications

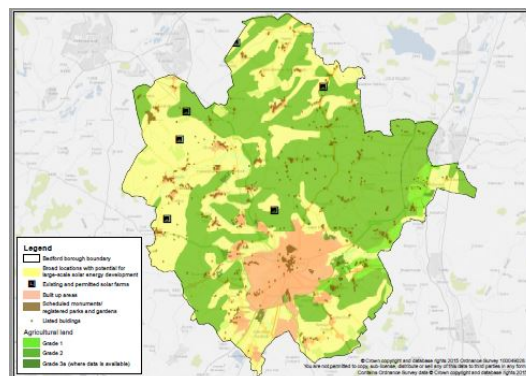


Figure 1. 4 Solar potential locations in yellow.

## Solar Panel Related Applications

There were three planning applications relating to Solar Panel installations in the monitoring period.

Category	Location	Application Number	Capacity	Carbon Saving
Commercial	Odell, Wellingborough NN29 7JQ	18/02002/M73 - V02.pdf. Pg. 9.	16.8mw @ 80%	8,675 tonnes
Church	All Saints Church Church Road Wilstead	18/02377/FUL - V03.pdf. Pg. 1.	7.5kw	
Domestic	28 Ryder Close Great Denham	19/00015/FUL	<5kw	

## Wind Turbine Related Applications

There were no planning applications related to wind turbine installations in the monitoring period

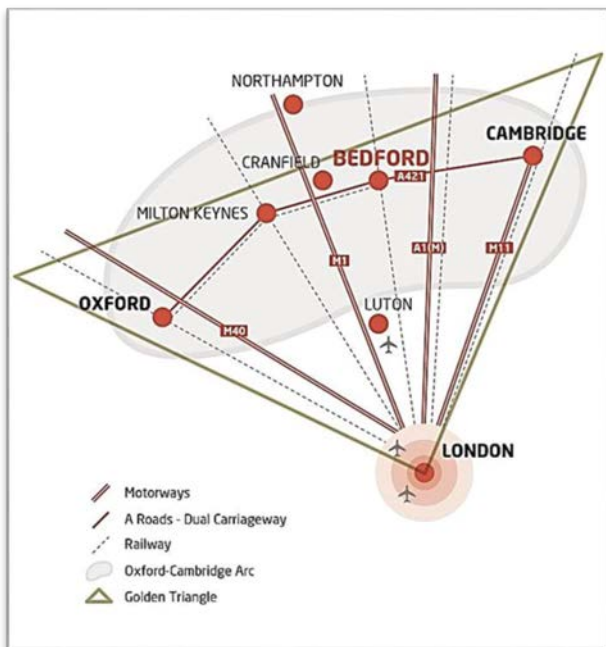
## Duty To Cooperate

As part of the process of preparing a local plan, the council has a statutory [Duty to Cooperate](#) with other authorities and agencies where strategic and cross boundary issues are identified.

### Bedford's Strategic Positioning

The Bedford Borough is home to about 168,000 people, two thirds of whom live in the main urban area of Bedford and Kempston and one third in the surrounding rural area. Bedford lies midway between the M1 and A1 and about 30 miles north of the M25.

London is just over half an hour away by train and its five airports are within easy reach from Bedford by car and public transport. Improving east west transport infrastructure means that the borough is enjoying increasingly stronger links with centres in the Oxford to Cambridge corridor. Within the Golden Triangle (Figure 1), Bedford borough is already a great location to live and do business and its future prospects are excellent.



**Figure 1.** Bedford's strategic location.



**Figure 2.** The South East Midlands Local Enterprise Partnership area.

Along with the other two Bedfordshire unitary authorities, Luton and Central Bedfordshire, Bedford borough has historically been on the western edge of the East of England planning region. With the abolition of regional plans, the borough is now part of the wider south east grouping of local authorities.

Figure 2 shows Bedford borough and those near neighbours that now make up the South East Midlands Local Enterprise Partnership (SEMLEP). Since its inception in February 2012 the Council has been a member of the SEMLEP Planner's Forum. The Forum seeks to identify common planning issues across the SEMLEP areas. (See Appendix 2 for details)

The Borough's immediate Local authority neighbours (figure 3) are the unitary Councils of Central Bedfordshire and Milton Keynes, the Borough of Wellingborough and East Northamptonshire District Council which are within the County of Northamptonshire and Huntingdonshire District Council which is within the County of Cambridgeshire.

In November 2013 the Council presented a briefing note to the Forum to explain the Local Plan review process on which the Council was embarking and to set out and to share the draft strategic issues for the plan (see Appendix 1 for details). These were:

1. Overall scale of new housing development
2. Overall scale of new employment provision
3. New development adjacent to the boundaries of other authorities
4. Future needs for Gypsies and Travellers and Travelling Show people
5. Impact on the highway network
6. East-West Rail
7. Midland Mainline Rail Electrification
8. Green Infrastructure
9. Town Centres
10. Flood Risk And Water Infrastructure Capacity
11. Health

### **Duty of Cooperation – Strategic Cross Boundary Matters**

The following section of the statement demonstrates how the Council has met the duty to co-operate for each strategic cross boundary matter. For each issue, a summary is provided to set out:

- A summary of the cross boundary strategic matter
- Who has been involved and
- How the Council has addressed the issue through co-operation and joint working, including the nature and timing of the co-operation.
- The result of the co-operation and the key outcomes, including how it has influenced the preparation and content of the Local Plan.

The tables for each strategic matter above identify the key partners. In addition, there has been continuing engagement with the Council's neighbouring Local Authorities throughout the preparation of the plan. In conjunction with the 2015 issues and options consultation the Council met with all of its neighbouring Local Authorities and continued to explore the strategic matters for the plan but no additional strategic issues were identified. From the 2017 issues and options consultation onwards meetings were held specifically focusing on the strategic issues and points of agreement were recorded. The table below shows a summary of the agreements with each of the Local Authority partners.

The table below provides a summary of the points discussed and agreed in relation to each strategic matter and record where there was ongoing cooperation. The tables record a snapshot of the agreed position at three points in time following meetings held to coincide with the Issues and Options consultation in 2017, the Local Plan 2035 draft Plan for Submission consultation in spring 2018 and the 2030 draft Plan for Submission consultation in autumn 2018. At each iterative stage new information for each strategic matter was added to the tables as necessary.



**Summary of points discussed and agreed in cooperation with neighbouring authorities.**

<b>Authority / organisation</b>	<b>Strategic issues bodies are involved in</b>	<b>Outcome</b>
Central Bedfordshire Council	Overall scale of new housing provision, overall scale of new employment provision, new development adjacent to boundaries with other authorities, green infrastructure, impact on the highway network.	Housing market area (HMA) geography is agreed and the objectively assessed need for the borough is agreed. Joint arrangements are in place for the determination of planning matters at Wixams. Both councils are working with the Bedford and Milton Keynes Waterways Trust and the Forest of Marston Vale to deliver green infrastructure. Agreement to jointly prepare a design guide for the Marston Vale. The two councils recognise that there may be need to liaise about future development opportunities relating to the A1 including at Tempsford.
Luton Borough Council	Overall scale of new housing provision, overall scale of new employment provision.	HMA geography is agreed and the objectively assessed need for the borough is agreed. Outputs and approach to employment land is agreed.
Huntingdonshire District Council	Overall scale of new housing provision, overall scale of new employment provision, new development adjacent to boundaries with other authorities.	It is agreed that the boundaries of the two authorities form the best fit boundary for the respective HMAs and therefore no cross boundary issues arise in relation to HMAs. Both councils expect to meet their objectively assessed housing and employment needs within their administrative boundaries so no cross boundary issues arise. The January 2018 Regulation 19 plan contained a policy setting out the approach to the determination of applications at Wyboston Lakes which was drafted following discussions between the two local planning authorities.
Milton Keynes Council and South East Midlands Local Enterprise Partnership (SEMLEP)	Overall scale of new housing provision, overall scale of new employment provision, green infrastructure, other infrastructure.	HMA geography is agreed and the objectively assessed need for the borough is agreed. There are no concerns about employment provision. SEMLEP is preparing an Oxford to Cambridge wide industrial strategy and energy strategy for the area in which member councils will be involved.
Northamptonshire County Council, North Northamptonshire Joint Planning Unit, Wellingborough Borough Council and East Northamptonshire Council	Overall scale of new housing provision, overall scale of new employment provision, new development adjacent to boundaries with other authorities, impact on the highway network.	The HMA geography is agreed and the Northamptonshire authorities have no concerns about OAN or employment provision. The January 2018 Regulation 19 plan contained a proposal for a garden village near to Sharnbrook and Bedford and the Northamptonshire authorities agreed to work towards a statement of common ground on cross boundary issues (including highway issues). The garden village proposal is however, not now being progressed.

<b>Authority / organisation</b>	<b>Strategic issues bodies are involved in</b>	<b>Outcome</b>
Greater London Authority (GLA), Mayor of London and Transport for London	Overall scale of new housing provision.	Involvement in the wider south east officer working group to engage with the GLA led to the publication of a London Plan. London is planning to meet the majority of its own needs for housing and employment and has not identified a specific need for any wider south east authority to accommodate any of London's growth. Transport for London confirmed that it had no comments to make.
Clinical Commissioning groups and National Health Service Commissioning Board	Other infrastructure.	Joint working on health care provision is reflected in the Infrastructure Delivery Plan.
The Environment Agency	Green infrastructure, other infrastructure.	The council's Strategic Flood Risk Assessment has been agreed with the Environment Agency.
Highways England	Impact on the highway network.	The borough-wide highway model has been validated and agreed.
Historic England	Impact on heritage assets.	Commented on the plan for submission but no strategic issues raised.
Natural England	Impact on the natural environment.	Commented on the plan for submission but no strategic issues raised. Natural England is a member of the Bedfordshire Local Nature Partnership.
Civil Aviation Authority	Impact on aviation.	Consulted on draft local plan for submission but no response received and it is assumed that it has no strategic issues to raise.
Homes England	Opportunities for new housing provision. Other infrastructure.	Ongoing work in the context of the One Public Estate board and Housing Infrastructure Fund.
Office of Rail Regulation / Network Rail	Impact on the rail network and in particular, East-West Rail and Midland Mainline rail electrification.	Ongoing joint working to facilitate the implementation of the East West Rail western section and planning for the central section.
Bedfordshire Local Nature Partnership	Impact on the natural environment and green infrastructure.	Joint working as part of the partnership on issues including natural capital in the Oxford to Cambridge corridor.

## Appendix 1 – Details of Strategic Planning Issues

**Strategic Planning Issue 1:** Overall scale of new housing development.

<p><b>1. Strategic Planning Issue:</b> Overall scale of new housing development.</p> <p>The NPPF 2012 requires that <i>LPAs</i> ensure that Local Plans meet the full objectively assessed needs in the housing market area.</p>
<p><b>2.Evidence Base</b></p> <ul style="list-style-type: none"> <li>• Bedford Borough Demographic Forecasts 2012-32. December 2013 prepared by Edge analytics setting out a range of growth scenarios to support the issues and options consultation in 2014</li> <li>• Objectively Assessed Need for Bedford: An evidence base for establishing overall housing need. Report of Findings April 2015 to support the 2015 issues and options consultation.</li> <li>• Housing Market Area report October 2015 (subsequently incorporated in Chapter of the SHMA as chapter 2)</li> <li>• Bedford Strategic Housing Market Assessment. Report of Findings December 2015 (consulted upon in January 2016)</li> <li>• Updated Strategic Housing Market Assessment Update 2016; Report of Findings October 2016 (in support of the April 2017 issues and options consultation and January 2018 draft Plan for Submission consultation)</li> <li>• Bedford Strategic Housing Market Assessment Update. Report of Findings and Addendum Report August 2018. In support of the Local Plan 2030 draft Plan for Submission consultation.</li> </ul>
<p><b>3.Strategic Partners</b></p> <p>The strategic partners who jointly undertook the HMA assessment were Bedford Borough Council, Central Bedfordshire, Luton, Milton Keynes, North Hertfordshire, Stevenage and Aylesbury Vale Councils.</p> <p>Whilst the SHMA was not prepared jointly the fact that the HMA work had confirmed that Bedford Borough's administrative area is the best fit for the Bedford functional HMA confirmed that there was no need for it to be undertaken on a joint basis.</p>
<p><b>4.Actions</b></p> <p><b>Action:</b> In relation to the <b>Housing Market Area</b> No actions in the monitoring period were required.</p> <p><b>Partners:</b> The key partners are listed above.</p> <p><b>Outcome:</b> N/A.</p>
<p><b>Ongoing Cooperation</b></p> <p>At the present time there is no need to look again at the HMAs in Bedford and the surrounding areas but if necessary the Council could work with the same grouping of authorities to undertake a review.</p>

**Action:** In relation to the **Strategic Housing Market Area**

In parallel to the Housing Market Area work ORS also undertook a Strategic Housing Market Area Assessment. A preliminary report "Objectively Assessed Need for Bedford" was published in April 2015 to accompany the 2015 consultation paper. The full "Bedford SHMA: Report of findings" dated December 2015 setting out the OAN for the period 2012-32 was the subject of consultation in early 2016. This report included a chapter on the Housing Market Area which incorporated the findings of the joint HMA work. Subsequently a further update reflecting an adjustment to the plan period to 2015-35 and updated household forecasts the "Bedford SHMA report of findings October 2016" was published and formed part of the 2017 consultation and January 2018 draft Plan for Submission consultation. An Addendum was added in August 2018 to evidence the amendment to the OAN arising from the change to a 2030 end date for the plan.

**Partners:** There were no joint working partners as given the agreement on the housing market areas and the fact that the borough boundary is also the best fit for the Bedford HMA there was no need to work jointly. In respect of the outputs of the SHMA and in particular the OAN the Council engaged specifically with neighbouring Councils and agreed the housing requirement for the Borough.

**Outcome:** Agreement with neighbouring Local Authorities and SEMLEP that the OAN for the plan is 970 dwellings per annum (14,550 over the plan period)  
Ongoing Cooperation N/A.

**Date :** October 2018

**Action :** In relation to **direct engagement with the Greater London Authority (GLA)**

The Council has engaged directly with the Greater London Authority (GLA) in respect of the OAN. The GLA responded to the Council's 2017 consultation and a meeting took place between the Council and the GLA on 10 July 2017. The GLA explained that its approach was to seek willing partners for growth amongst wider south east authorities where mutual benefits could be achieved.

**Partners:** GLA

**Outcome:** The meeting established that the Council did not see any basis to put itself forward as a willing partner at that time. Subsequently the draft London Plan and related minor suggested changes have been published stating that London is planning to meet the majority of its own needs for housing and employment. Approximately 1,000 dwellings per annum will need to be provided in the wider south east but the London Plan states this will be met by agreements with willing partners.

**Ongoing cooperation.**

The Council has been actively involved in the Wider South East Officer Working Group and the associated Wider South East Political Steering Group. These groupings alongside what have become annual Summits to which all Councils in the Wider South East are invited have focussed on addressing barriers to housing delivery, the provision of infrastructure at a wider south east level and the review of the London Plan. The London Plan examination is programmed to start in mid-January 2019.

**Strategic Planning Issue 2:** Overall scale of new employment provision

**1. Strategic Planning Issue:** Overall scale of new employment provision

LPAs are required to have a clear understanding of business needs within and across their area. The NPPG (ID:2a 006) advises that these needs should be assessed working with the relevant functional economic area.

**2.Evidence base**

- Economy and Employment Land Study (EELS) 2015.
- Economy and Employment Topic Paper 2017.
- Economy and Employment Land Study (EELS) Addendum 2018.
- Economy and Employment Topic Paper 2018.
- East of England Forecasting Model (EEFM) 2014, 2016, 2017

### 3.Strategic Partners

#### In respect of the Economy and Employment land study (EELS)

A stakeholder workshop was held on 6 February 2014 attended by local developers and property companies and the methodology and EELS study outcomes were shared and agreed with neighbouring Local Authority Partners.

#### In respect of the EEFM

The Council has worked jointly with other Councils in the former east of England region and beyond to develop the East of England Forecasting Model which provides an input to the assessment of economic needs. Bedford Borough is a member of the EEFM steering group.

### 4. Actions

#### Action: In respect of establishing the Functional Economic Market Area

The Economy and Employment Land Study (EELS) 2015 was undertaken by consultants GVA on behalf of the Council. The study established that the functional property market area differs between the office and the industrial /warehousing sectors. The office market is localised and principally focussed on local demand whereas the warehousing sector has a much wider extent stretching from the M25 along the M1 and as far east as Cambridge. In respect of the FEMA defined by the relationship between the Borough's economic activity and workforce the strongest economic focus is within the Borough's boundaries which means that like the housing market area the boundary is the appropriate basis for assessing the Borough's economic needs.

**Partners:** See above.

#### Ongoing Cooperation

In the respect of the EEFM the Council will continue to work as part of the EEFM steering group to oversee the production of future updates. The next update, using 2017 baseline data is due to be published in 2019.

SEMLEP are currently engaged in two pieces of employment related work in the form of the Local Industrial strategy for SEMLEP and a wider overarching Economic Vision for the Oxford- Milton Keynes – Growth Corridor as a whole. The Borough is a stakeholder in this process.

**Action:** In respect of establishing the number of jobs to be provided over the plan period using the East of England Forecasting Model.

The EEFM baseline forecasts were published in August 2016 and a further 2017 update was published in September 2018.

**Partners:** Former East of England region Local Authorities and East of England Local Government Association.

**Outcome:** Consistent economic forecasts for the region which can be used by Local Planning authorities in developing Local Plans.

### 4.Ongoing cooperation

In the respect of the EEFM the Council will continue to work as part of the EEFM steering group to oversee the production of future updates. The next update, using 2017 baseline data is due to be published in 2019.

SEMLEP are currently engaged in two pieces of employment related work in the form of the Local Industrial strategy for SEMLEP and a wider overarching Economic Vision for the Oxford- Milton Keynes – Growth Corridor as a whole. The Borough is a stakeholder in this process.

### **Strategic Planning Issue 3: New development adjacent to the boundaries with other authorities**

#### **1. Strategic Planning Issue. New development adjacent to the boundaries with other authorities.**

Where development is proposed adjacent or near to the boundary with other local authorities it is important that the cross boundary impacts are taken into account and where possible, agreement reached on cross boundary matters.

There are two key area of policy where there has been ongoing cooperation with neighbouring Councils are:

1. Employment policy at Wyboston
2. The highway impacts of Colworth Garden village proposed in the Local Plan 2035 draft Plan for Submission.

#### **2.Evidence Base**

1. Economy and Employment land supply (EELS) 2015
2. Local Plan 2035 cumulative modelling report (December 2017) and the SYSTRA Sharnbrook Railway Initial Feasibility report. These reports can be found [here](#).

#### **3.Strategic Partners**

The strategic partners were the relevant Local Authority in each case. In respect of the Colworth Garden village issues the Local Authorities were Northamptonshire County Council, Wellingborough Council, East Northants Council and the North Northamptonshire Joint Planning Unit was also involved

#### **4.Actions**

**Action :** In respect of Employment policy at Wyboston.

Wyboston Lakes is situated on the Borough's boundary with Huntingdonshire. The site is partly developed for various uses including recreation, leisure, hotel, conference and training uses. The Council was seeking to develop a Local Plan policy to guide the future use of the site and therefore in October 2017 sought the views of Huntingdonshire DC on the future direction of the policy. As a result policy wording was developed taking account of input from Huntingdonshire DC which seeks to ensure that the policy does not impact on St Neots town centre but does provide good pedestrian/cycle links for those accessing the leisure and training uses at Wyboston Lakes. Huntingdonshire DC confirmed their support and agreement to the policy at a duty to cooperate meeting held on 12<sup>th</sup> February 2018.

**Partner :** Huntingdonshire District Council

**Outcome:** Agreement on the wording of Policy 76 Wyboston Lakes included in the Local Plan 2035 draft Plan for Submission and subsequently the Local Plan 2030 draft Plan for Submission .

**Date :** 12<sup>th</sup> February 2019.

**Ongoing cooperation.** None needed on this issue at this time

**Action :** In respect of the highway impacts of Colworth Garden village proposed in the Local Plan 2035 draft Plan for Submission.

The Local Plan 2035 draft Plan for Submission proposed a new settlement called Colworth Garden Village which is close to Sharnbrook village and the boundary of the borough with Northamptonshire. The site was chosen from amongst four alternatives which were consulted on as part of the 2017

consultation paper. The four alternatives were Colworth Garden Village, Thurleigh, Twinwoods and Wyboston.

From summer 2017 when all four new settlement options were being consulted upon (prior to the selection of Colworth Garden village as the Council's preferred new settlement option in January 2018) the Council engaged with the Northamptonshire Councils in particular to ensure that the cross boundary highway impacts were considered. At the duty to cooperate meeting held on 14<sup>th</sup> June 2017 it was agreed that officers should work together to ensure that the work which BBC was undertaking in relation to the new settlement proposals and the A6 took account of the development and infrastructure improvements being planned in the corridor and that as further work was undertaken on the Bedford model outputs would be shared.

A meeting was held discuss the transport modelling outputs on 25<sup>th</sup> January 2017 and it was the intention that Bedford and the Northants Councils would then work towards agreeing a statement of common ground about transport matters prior to the plan examination hearing . At the end of the Local Plan 2035 draft Plan for Submission consultation however it became clear that in the absence of an agreement between the site promoters and Santa Pod Raceway about noise issues the Colworth Garden village proposal would not be taken forward and the therefore the joint work did not progress further.

**Partners:** Northants authorities as above.

**Outcome:** Outside of these discussions it became clear that the Colworth Garden Village proposal would not be taken forward. The Colworth proposal is not included in the Local Plan 2030 draft Plan for Submission.

**Ongoing cooperation.** None needed on this issue at this time

#### **Strategic Planning Issue 4: Future needs for Gypsies and Travellers and Travelling Show people.**

**1.Strategic Planning Issue.** The approach to be taken to assessing future needs for Gypsies and Travellers and Travelling Show people.

All of the Council's neighbouring Planning authorities are proposing to meet needs for these groups within their own boundaries and so there was no need for a strategic policy response to this matter.

#### **Strategic Planning Issue 5: Impact on the Highway network**

**1. Strategic Planning Issue.** Impact on the Highway network

It is important to ensure that the impact of proposed development on the highway network is assessed both within the Borough and in particular instances where development is planned close to the borough boundaries, beyond. This assessment is facilitated by undertaking modelling of the plan's proposals using the Bedford Transport Model. Highways England are a key partner in this work.

Throughout the preparation of the plan the Council has worked with Highways England in respect of the following:

- Approval of the Bedford Transport Model for use on the Local Plan
- Assessment of key sites received at the call for sites stage which may impact on the Strategic Road Network
- Participation, as stakeholders during Highways England's recent consultations on the strategic studies and route strategy listed below,
  - Oxford Cambridge Expressway
  - A1 improvements
  - A428 Black Cat to Caxton Gibbet

**Ongoing cooperation:** Cooperation is expected to continue as the schemes progress.

## Strategic Planning Issue 6: East West Rail

<b>1. Strategic Planning Issue. East West Rail</b>
<p>The promotion of an east west strategic link connecting East Anglia to Oxford, southern and western England has been a long term objective of the Council since the East West Rail consortium was formed in 1995. Part of the western section between Oxford, Bicester Village and Marylebone has been completed and is in operation. Work on the second phase of the western section from Bicester Village to Bedford has started and a Transport and Works Act Order application was submitted on 27 July 2018.</p> <p>The central section between Bedford to Cambridge presents more challenges as the original Varsity Line has now been built over and a new corridor needs to be determined. Network Rail announced in 2016 that the route will be via Sandy and a preferred route is now due to be selected during 2019, with public consultation due to start in February.</p>
<b>2.Evidence Base</b>
<ul style="list-style-type: none"><li>• Endorsement and support for the route from the East West Rail Consortium, and Network Rail.</li><li>• Transport and Works Act Order application</li></ul>
<b>3.Strategic Partners</b>
<ul style="list-style-type: none"><li>• Network Rail</li><li>• East West Rail Consortium</li><li>• East West Rail Company</li></ul>
<b>4.Actions</b>
<p><b>Action :</b> In respect of the western section</p> <p>The western section phase 1 linking Oxford to Bicester was completed in 2016 and phase 2 of the western section links Bicester to Bedford. Along with other partners the Council helped facilitate three rounds of public consultation and as a member of the East West Rail Planning Ahead Group contributed to the scoping of the Environmental Statement for the route and subsequently commented on its content before it was submitted as part of the Transport and Works Act Order (TWA). The Council provided a full response to the TWA Order. It continues to support the principle of the proposal and to work collaboratively with the other partners and Local Authorities along the route, but has made a holding objection regarding local issues in relation to construction traffic, ecology and arrangements for rail crossings.</p> <p><b>Partners</b> as above</p> <p><b>Outcome:</b> The route will progress to examination in 2019.</p> <p><b>Date :</b> Ongoing</p>
<p><b>Action :</b> In respect of the central section</p> <p>Prior to the 2016 Network Rail announcement that the preferred corridor would be Bedford / Sandy / Cambridge, the Council has, since 2015, been involved in stakeholder workshops and in providing local evidence to enable the long list of potential routes to be assessed.</p> <p>The Council is now working with the East West Rail Company and Network Rail to further develop potential route options, and is supporting NR to fully consider the impact of options north and south of Bedford, in particular on traffic in and around Bedford. The Council has an agreement with Central Bedfordshire Council that states that both Councils support a 'through Bedford route' which provides development opportunity between Sandy and St Neots</p> <p><b>Partners :</b>Network Rail, East West Rail Consortium, East West Rail Company, Central Bedfordshire Council</p> <p><b>Date :</b> Ongoing</p>
<b>Outcomes from strategic working</b>
<p>There is presently no final route for the central section. Although a route is due to be announced next year this will not happen until further consultation has been undertaken. The Plan cannot</p>



therefore show a route for East West Rail but it is listed in Policy 94S as a transport improvement which the Council will seek to deliver with partner agencies.

**Ongoing cooperation**

The Council will continue to work with partners and stakeholders until the scheme is delivered.

**Strategic Planning Issue 7: Midland Mainline Rail Electrification**

1. **Strategic Planning Issue.** Midland Mainline Electrification

2. **Evidence Base.** Network Rail 2010 Route Plan

3. **Partners.** Network Rail.

4. **Actions**

**Action :** In 2012 network Rail announced a proposal for the electrification of the Midland Mainline to Corby, Nottingham and Sheffield with an anticipated full implementation by 2020. When the strategic issues for the plan were being scoped in late 2013 it was anticipated that the electrification would be an important area of collaboration and cooperation with Network Rail. The scheme progressed more slowly than anticipated and was put on hold in 2015. In July 2017 the electrification from Kettering to Leicester, Nottingham, Derby and Sheffield was cancelled and revised timetabling announced for the route to Corby only. These changes were and continue to be matters of great concern to the Council. The Council has worked with Network Rail to facilitate major works at Ford End Road (completed in July 2018) and work will start in early 2019 on works to the Bromham Road bridge. The Council and Network Rail have signed an agreement setting out how they will work together on this project.

**Partner:** Network Rail

**Outcomes From Strategic Working**

Electrification proposals north of Bedford are due to be complete in late 2019.

**Ongoing Cooperation**

The Council will continue to work with Network Rail to complete the electrification proposals.

**Strategic Planning Issue 8: Green Infrastructure**

1. **Strategic Planning Issue** Green Infrastructure

The key area where there is a need for cross boundary planning in respect of green infrastructure is the Forest of Marston Vale. In addition, cooperation on more strategic level Green Infrastructure planning has taken place in the context of the Local Nature Partnership.

Ensuring compliance with the Habitats Directive is also an important area of joint working relating to planning for green infrastructure.

2. **Evidence Base**

- The Forest Plan 2000
- Habitats Regulations Assessment 2018

3. **Strategic Partners**

- Central Bedfordshire District Council, The Forest of Marston Vale Trust
- Natural England
- Local Nature Partnership
- Anglian Water

4. **Actions**

**Action :** In respect of the Forest of Marston Vale

The Forest of Marston Vale is one of the 12 community Forests in England which lies partly within Bedford Borough and partly within Central Bedfordshire. The creation of the forest is guided by the Forest Plan. The forest has been in existence for 21 years during which time over 1000 ha of new woodland have been planted. To further enhance the implementation of the forest it was suggested by the Forest of Marston Vale Trust in August 2017 that it would be worthwhile to prepare a design guide for the forest and to develop a policy to be included in both Bedford and CBC's local plan requiring that applicants demonstrate that their proposals are consistent with the design guide. Both

draft plans for submission included policies referencing the design guide. A meeting was held on 9<sup>th</sup> October 2018 to discuss the scope of the design guide and the process for its production.

**Partners** : Central Bedfordshire District Council, The forest of Marston Vale Trust

**Outcome:** Both draft plans for submission contain a policy referencing the design guide.

**Date** : October 2018

**Ongoing cooperation:** The Forest of Marston Vale have made representations to the CBC pre submission plan and the Bedford 2030 draft Plan for Submission seeking greater alignment of the policy wording in the two plans. In response to this a minor amendment to the plan has been proposed to achieve this alignment in the policy wording.

**Action** : In respect of the Habitats Directive

To ensure that the plan does not have a likely significant effect on any Sites of European Significance (Natura 2000 sites), alone or in combination with other plans and projects, a Habitats Regulations Screening Report was published in January 2018. There are no Natura 2000 sites within the Borough but some are located close by for example associated with the River Great Ouse east of St Ives and River Nene to the north and west of the Borough.

Following a European Union Court of Justice decision in April 2018 (People Over Wind) a further screening and full Habitats Regulations Assessment was undertaken in July/August 2018 and published as one of the supporting documents to the Local Plan 2030 draft Plan for Submission. Both Natural England and the Environment Agency provided comments on the Habitats Regulations Assessment. Subject to some minor amendments, the Environment Agency found the Assessment to be acceptable. Natural England requested further explanation and additional information to be included in the Assessment. A meeting was held with Natural England on 8<sup>th</sup> November 2018 to discuss their comments. Following this, the HRA was revised to cover the points that had been discussed in the meeting. A further version of the HRA has been provided to Natural England for their comments. The HRA concludes that the Local Plan 2030 will not have adverse impacts on qualifying features leading to loss of site integrity of any European Site.

**Partners** : Natural England, Environment Agency, Anglian Water

**Outcome:** Additional information included in the Habitats Regulations Assessment to address the concerns of the Environment Agency and Natural England.

**Date** : November 2018

**Ongoing cooperation:** Opportunities in the future to explore joint working with other authorities to assess the impact of development on sites of European Significance.

**Action** in respect of Local Nature Partnership strategic level green infrastructure planning.

**Action:** The Bedfordshire Local Nature Partnership was established in 2013 and includes a wide range of partners from the public and private sectors and community interest groups. The partnership is focusing on three main areas of work:

- Valuing the natural environment
- The natural environment and health
- The natural environment and development.

Bedford borough Council has been involved in all of the main areas of work above in addition to having a seat on the board and being a member of the Management Steering Group and attending regular meetings. Discussions have taken place within the Management Steering Group of the Local Nature Partnership regarding proposed planning policies. The LNP has been looking ahead to issues relating to the Oxford to Cambridge corridor and has examined the need for a natural capital

investment plan to accompany future proposals for the Corridor and has led on the production of a report which was published in August 2018.

**Outcome:** Natural Capital Investment Plan published in August 2018.

**Ongoing cooperation:** The Council will continue to be involved in cross boundary green infrastructure planning through its membership of the Partnership. The Natural capital investment plan will inform future plans across the corridor including the review of this Local Plan.

### **Strategic Planning Issue 9: Town Centres**

#### **1. Strategic Planning Issue Town Centres**

Town Centres and the relationship between centres in neighbouring areas in particular where the growth and change of centres may affect those in neighbouring areas.

The Council has undertaken a retail study as part of the preparation of the plan. The Bedford Retail Study was undertaken by Peter Brett Associates on behalf of the Council in 2015 and an addendum report was added in 2018 to change the report to cover the period up to 2030.

The retail study takes account of the impact of competing retail attractions outside of the Borough. None of these impacts raised matters which needed to be addressed on a cross boundary basis.

### **Strategic Planning Issue 10: Flood risk and water infrastructure capacity.**

#### **1. Strategic Planning**

The plan needs to ensure that it deals with flood risk from all sources in relation to strategic policies and site allocations.

#### **2. Evidence base**

Strategic Flood Risk Assessment Level 1 2015

Flood Risk Sequential Test Statement 2018

#### **3. Strategic Partners**

Environment Agency

Beds and River Ivel Internal Drainage Board (IDB)

Anglian Water

#### **4. Actions**

**Action :** Strategic Flood Risk Assessment (SFRA) Level 1

In December 2013 the Council appointed consultants URS to undertake the SFRA level 1 study. The Environment Agency, IDB and Anglian Water were involved throughout the process commenting on drafts of the study. The final study completed in June 2015 was endorsed by all three bodies. SFRA has been part of evidence base for the assessment of sites.

**Partners** Environment Agency, IDB and Anglian Water

**Outcome:** Information about the risk of flooding updated which could then be used as a basis for individual site assessment as part of the Local Plan process.

**Date :** June 2015

**Action:** Assessing water infrastructure capacity

Following two call for sites exercises in 2014 and 2015 all sites were assessed by Anglian Water and through RAG assessment in 2016. The purpose of this was to determine (largely for Anglian Water's own purposes in the context of their Water recycling Long Term Plan) what effect the sites would have on existing water infrastructure, such as water recycling centres and other assets managed by the water company for the area.

**Outcome:** Site assessments are complete.

**Date:** August 2016

**Ongoing cooperation:** discussions are ongoing about water infrastructure.

**Action :** Assessing the risk of flooding in allocating sites.

Following two call for sites exercises in 2014 and 2015 all sites were assessed by Anglian Water and through RAG assessment in 2016. The purpose of this was to determine what effect the sites would have on the capacity of existing water infrastructure, such as water recycling centres and other assets managed by the water company for the area. (EA not involved in this particular work because they do not manage the water infrastructure)

Prior to the issues and options consultation which took place in 2017 the EA and IDB were invited to comment on all sites included as potential options for allocation and which intersected with flood zones 2, 3a or 3b. The advice received from EA was that where appropriate the sites allocated should pass the sequential test. Flood risk was considered as part of the assessment process each site went through prior to the options being finalised as part of the 2017 consultation. This met the EA's requirements

Further EA comments were received during the draft Plan for Submission consultation in January 2018 as well as ongoing informal discussions during that period suggested the sequential test be applied to the full site areas for the sites the council sought to allocate rather than solely the area considered developable. To demonstrate this a Sequential Test procedure note was drafted in June 2018 and was agreed on 18 July 2018. The EA also made suggestions for minor amendments to parts of the Local Plan to demonstrate consistency with the procedure note. These amendments included the addition of a requirement for a site specific flood risk assessment to allocation policies that intersect with flood zones 2, 3a or 3b and the addition of wording to policy 96 - Flood Risk directing development to areas of lowest risk.

**Partners :** Environment Agency, IDB.

**Outcome:** Completion and agreement with EA of Sequential Test procedure note to demonstrate that the sequential test has been applied to submitted sites.

**Date** July 2018

#### **Outcomes from strategic working**

As a result of the cooperation with the strategic partners, the scope of relevant studies to inform the plan's policies were identified and the studies informed the sequential location of development in the 2030 Local Plan. In respect of the Local Plan allocations the policies make clear where site specific FRAs will be required providing guidance to prospective developers.

Anglian Water, as the infrastructure provider supported the adoption of optional efficiency standards in policy 53 due to Bedford Borough being in a water stressed area as identified by the EA.

#### **Ongoing cooperation**

The Environment Agency, Internal Drainage Board and Anglian Water will be consulted on strategic sites when applications come forward. Where site specific policies require a site specific flood risk assessment the EA will be consulted to ensure it is comprehensive. Anglian Water have completed their Long Term Water Recycling Plan (WRLTP) which sets out their proposed investment in water infrastructure up to 2045. This WRLTP will inform their business plan for the next 5 years, which is due to be finalised in 2019.

### **Strategic Planning Issue 11: Health**

#### **Strategic Planning Issue 11: Health**

As one of the sections to the infrastructure delivery plan (IDP) there is a need to assess the primary and community health impacts of growth proposed in the Borough and to identify the means by which the associated infrastructure needed can be provided. Primary health in this context constitutes out of hospital based medical and social care services, including particularly general practitioner services but additionally potential mental health and other community provision administered through the Bedfordshire Clinical Commissioning Group (BCCG).

Regular liaison in relation to growth in the Borough is carried out with the NHS Bedfordshire CCG which is responsible for the majority of the Borough but also when required with the NHS Cambridgeshire CCG in relation to the Wyboston area to the east of the Borough, which falls into that CCG area.

#### **Evidence Base**

The LPA has shared available information, particularly map-based data, with the BCCG and its NHS colleagues to ensure that the Local Plan's emerging growth strategy, which has progressed through a number of iterations, is fully understood and is reflected accurately in relation to assessing the implications for the existing NHS estate and primary medical services both privately and NHS owned. The BCCG have shared and explained their emerging estates strategy as directed by Government, relating growth plans and infrastructure solutions to the current NHS Hub and Spoke business planning and financing restrictions.

The implications have then been considered in relation to the existing and anticipated future distribution of primary health care infrastructure including surgery condition / capacities and patient list sizes. Preferred surgery co-locations and catchment sizes have been discussed at officer and political level in relation to existing provision; the known aspirations and intentions of general practitioners and local user groups. The potential appropriateness and availability of developer contributions from LP housing allocations can then be considered alongside potential bids to the NHS Estates & Technology Transformation Fund (ETTF).

#### **Strategic Partners**

The Council as Local Planning Authority sits on the BCCG's Estates & Premises Sub-group which includes a number of representatives from the BCCG itself; NHS property services managers; the One Public Estate programme hosted by the Council; invited NHS providers/suppliers together with officers from Central Bedfordshire Council. The group is empowered to make local funding decisions in relation to the expenditure of s106 funding arising from implemented planning permissions; potential CIL receipts including Neighbourhood Plans / Parish Council concerns over health delivery.

#### **Actions**

The BCCG has been working with partners to arrive at an appropriate local solution to the delivery of primary health services in Bedfordshire whilst transforming and modernising the current NHS property estate. The Council at an early stage engaged with the CCG and this led to the agreed health section in the Infrastructure Delivery Plan supporting the 2018 Local Plan 2035 Regulation consultation and an update to the IDP in September 2018.

Land use planning and development issues are regularly reported to the Estates Sub-Group as a standing agenda item, leading where appropriate to follow up, including site, meetings, particularly in relation to the ongoing build-out of the cross-boundary Wixams new settlement development.

The LPA in addition contributed to a West Mid-Bedfordshire working party which commissioned a BCCG feasibility study and option analysis by GVA into cross-boundary provision at Cranfield-Marston-Wootton in autumn 2016.

The Borough are currently active in providing input into the BCCG/BBC co-commissioned Borough feasibility study into the delivery of primary health care being carried out by specialist health consultants and which is part-funded by the One Public Estate programme, reflecting the importance of the existing NHS estate in the Borough. This report, may well yet lead to further changes to the IDP as the BCCP's strategy is aligned with the report's findings.

**Outcomes from strategic working** Action: Co-working; information sharing and strategy testing up to political level.

**Partners** : BBC; BCCG; CBC; NHS; private sector NHS providers

**Outcome:** The information on the population based need for primary care in the Borough, used to inform the Infrastructure Delivery Plan, has been improved leading to more beneficial outcomes including potential site and funding identification opportunities. This will enhance the council's ability

to deliver infrastructure set out in Policy 90S by clearly stating the identified needs and working with developers from an early stage in the planning process to accommodate such requirements.

**Date September 2018**

**Ongoing cooperation**

The Council will continue to resource ongoing support for and liaison with primary healthcare providers on a regular basis through the BCCG Estates Sub-group and/or other successor local mechanisms. This will include ensuring that the feasibility study is completed to the satisfaction of all partners and to allow an estates strategy to be adopted and implemented which meets the particular needs of the Borough.

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