

## **Consultation Statement**

### **Bedford Borough Design Guide SPD**

#### **Purpose of the Statement**

The preparation of this document conforms with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out the details of whom the Council consulted in preparation of the Bedford Borough Design Guide Supplementary Planning Document (SPD), a summary of the issues raised and a response, explaining how they have been addressed in the SPD.

#### **Initial Engagement**

The Council engaged internal staff of Bedford Borough Council in developing a scope for the SPD. This included officers from Development Management, Planning Policy and Heritage and Planning Compliance.

This first stage sought feedback on the proposed content of the document. This included a template of the layout of the document, descriptions and maps of defined character areas in the borough that were to be the subject of an analysis of character and how the information would be set out. It contained proposals for a number of settlements to be analysed to provide an example of the character for each of the character areas. Comments were sought on whether the settlement choices were appropriate and whether the character areas were consistent.

As a result of these internal discussions a scope was formulated.

#### **Public Engagement on the Scope**

A public consultation on the scope of the SPD ran between 6 September and 3 September 2021.

All Parish Councils and Members were consulted by email which included a link to the documentation on the Council's website. Paper copies were made available to view at the Bedford Central Library by appointment.

Neighbouring authorities advised by email included Central Bedfordshire Council, Milton Keynes Council, North Northamptonshire Council, West Northamptonshire Council, Luton Borough Council, Huntingdonshire District Council, and as well as Bedford Borough and neighbouring Parish Councils.

In addition, emails and letters (where no email address was supplied) were sent to statutory SEA bodies (Natural England, Historic England and the Environment Agency), specific consultation bodies and general consultation bodies (as defined in the 2012 Town and Country Planning regulations). General consultations bodies included planning consultants and developers, local organisations, community groups and members of the public where they appear on the Planning Policy consultation database. The Local Plan 2040 issues and options consultation ran at the same time and the design guide as mentioned within that consultation document. Where representations to the Local Plan consultation included a response to the design guide consultation this has been added to the responses table at Appendix A.

The Bedford Borough Design Guide scoping document, a sustainability appraisal screening document and instructions on how to respond were made available on the Council's website.

Forty four responses from twenty eight respondents were received commenting on the scoping document, including those from the SEA consultation bodies on the sustainability appraisal screening document. A summary of the responses received is set out below along with a response to show how the comments have influenced the draft design guide.

Respondent	Doc Reference	Comment	Council Response
Individual	General	<p>Developments in established areas should be discouraged from using generic designs and new property should reflect the designs and materials currently in existence. New developments in non-established or non-historic areas should be encouraged to use innovative designs that demonstrate progress appropriate to the modern era.</p>	<p>The design guide will provide an analysis of character areas in the Borough as well as general design principles based on that analysis, including how development should respect the surrounding character. Use of innovative design and modern methods of construction would be encouraged where it would be appropriate to do so. The design guide is not intended to curtail creativity or innovative design. The design guide will contain information on modern methods of construction.</p>
Individual	para 1.12	<p>I think the idea of the document and the layout are OK.</p> <p>The problems are all upstream:</p> <p>Policy 30 – The impact of development – design impacts says: "Developers will be required to implement or contribute towards measures to mitigate adverse impacts. Planning permission will not be granted where proposals fail to improve the character and quality of an area." Fine words but you are allowing - and promoting - development all over the borough which directly conflicts with this statement. There is no way you can mitigate away the impact of the Oxford Cambridge Arc, the associated infrastructure and 1M new homes. You are about to lay waste to vast swathes of the countryside and this document won't help to mitigate that in any way, shape or form.</p> <p>Consultation 1.12 says: "It also embeds the idea of promoting and integrating development with the natural environment as a key design principle in the borough from the very beginning." You cannot integrate development on this scale with the natural environment no matter how important you say it is. To be frank, you're just ticking boxes: you know it and we know it.</p> <p>We're not stupid.</p>	<p>The Local Plan 2030 was adopted after an examination in public and Policy 30 is applied on a case by case basis. The design guide will assist the implementation of the policy which secures the five-year land supply required by national planning policy and without which we would be unable to stop untrammelled development. The correspondent is correct in relation to some points around infrastructure but these comments would be more appropriately aimed at national government policy which sets growth targets.</p>

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Central Bedfordshire Council	General	<p>Thank you for the opportunity to comment on the Bedford Borough Design Guide Scoping Document. Central Bedfordshire Council do not have any specific comments to make on the scope and layout of the document as presented but fully support the preparation of an up to date Design Guide as a mechanism for delivering high quality development in the Borough.</p> <p>The Council are in the early stages of updating our current Central Bedfordshire Design Guide to reflect the recently adopted Local Plan and we would welcome your comments on our revised guidance at the appropriate time. We also look forward to continuing to work together to finalise the Forest of Marston Vale Design Guide in due course.</p>	Noted.
Individual	para 2.3	<p>I'm supportive of the creation of a new borough-wide design guide, in line with the NPPF objectives. My only comment relates to the local distinctiveness areas. I understand an analysis of the urban area has been carried out, however, I feel such an analysis should be extended to also include the rural areas and villages outside the Bedford urban area, in order to get the most value out of such a document and genuinely encourage high quality design within the borough.</p> <p>Therefore, the scope of the current content needs to be enhanced to also include the findings and details of the extended analysis covering</p>	Agree. Analysis of rural area has been undertaken as part of the preparation of the design guide.
Coal Authority	General	<p>Thank you for your email below regarding the Bedford Borough Design Guide Scoping Consultation. The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy &amp; Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>As you are aware, Bedford Borough Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.</p> <p>In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>	Noted.
Code DP on behalf of clients	para 2.3-2.4	<p>Background</p> <p>Recent guidance published by the government (paragraphs 73d, 125-129, National Planning Policy Framework (NPPF) 2021) has placed an emphasis on place making, design and the creation of beautiful places through the planning system. The government now expects local authorities to prepare design guides and codes to help those proposing development, understand what would be acceptable in terms of the shape pattern and design of development within particular areas. The Executors therefore acknowledge the need for Bedford Borough Council (BBC) to prepare a design guide for Bedford. These representations respond to the proposed scope and proposed method of production of the design guide.</p> <p>The BBDG-SPD contains a draft scope of what the final design guide is expected to cover and includes a draft layout of what the final document may look like. It also explains that to provide a foundation for the assessment of the character of the borough, it is envisioned that it will be geographically divided into local distinctiveness areas.</p>	

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		<p>Objection to the current scope            Paragraphs 2.3 - 2.4 of the BBDG-SPD scoping consultation document explain that the design guide intends to use the six landscape character types identified within the Bedford Borough Landscape Character Assessment, 2020 (BBLCA) as a means of analysing the rural parts of the borough. This document is an update to the previous study commissioned by a partnership between Bedfordshire County and Bedford Borough Councils in 2006-2007 and as such provided an assessment across the county. The BBLCA divides the rural areas of the borough into six landscape types (out of a total of 12 landscape types for the Landscape Character Assessment (2006-2007) of the ceremonial county of Bedfordshire).</p> <p>The 2006-2007 study was an assessment beyond the boundary of Bedford Borough and therefore some of the character types include areas of land outside of the borough within Central Bedfordshire. For example, in relation to 5F Biggin Wood Clay Vale the majority of the character area is within Central Bedfordshire with only a small section within Bedford Borough at Little Barford. The BBDG-SPD will need to ensure that it includes clarification on how proposals for development within areas which include more than one character type where these anomalies exist should be assessed and how the guidance implemented.</p> <p>Paragraph 2.3 of the BBDG-SPD explains that the landscape types are further divided into landscape character areas. BBC proposes that the design guide will use each character type to analyse the different parts of the borough. A settlement within each landscape area will be assessed to provide details on settlement pattern and built character, and housing character and materials. The purpose of this is to provide guidance for future development in that landscape character type. However, again there is no indication that the BBDG-SPD will provide guidance on how proposals spanning across multiple character types will be considered. To allow for the development of well-designed and coherent cross boundary development, we contend that the BBDG-SPG needs to provide clarity on how the landscape character types should be applied to proposals that straddle more than one character type.</p> <p>For each of the six landscape character areas the BBDG-SPD proposes to provide commentary on:</p> <ul style="list-style-type: none"> <li>· visual and perceptual character;</li> <li>· cultural pattern and historic character;</li> <li>· settlement pattern and built character.</li> </ul>	<p>This is an important point. The Design Guide will include instructions on how the analysis should be used. It will explain that cues can be taken from different character areas (or local distinctiveness areas in the urban area) where proposals fall into more than one.</p>
Code DP on behalf of clients	para 2.6	<p>Paragraph 2.6 states that these commentaries are intended to provide a high-level indication of the qualities and characteristics of the historic built environment as a starting point for the design guide to build on. The following sections of the design guide are then intended to provide increased levels of detail on the specific built environment qualities of each area and will include the use of images and text to describe the existing pallet of materials and qualities of existing housing. The final section will analyse recently built homes within selected settlements within each landscape character area.</p> <p>Two settlements are selected within the Clay Vales: Wootton and Shortstown. These are located in character</p>	

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		<p>areas 5D and 5E. Little Barford is included in character areas 5F Biggin Wood Clay Vale and 4A Great Ouse Clay Valley. However, for the purpose of the BBDG-SPD, 5F does not contain any built settlement within the Bedford Borough area and 4A has Great Barford as its selected settlement, which is designated a key service centre and is very different in character from the existing settlement at Little Barford or a new settlement of circa 4,000 new homes. As a result, for any new development in Little Barford there is no appropriate character reference. Development at Little Barford would therefore appear to be reliant on the settlement assessments of Wootton, Shortstown and Great Barford in establishing guidance on built character.</p> <p>The NPPF provides scope at paragraph 129 where it states, “Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale”. The BBDG-SPD should provide separate guidance for allocated new settlements to recognise that new settlements provide an opportunity to create a distinct sense of place. Whilst recognising the landscape framework that these strategic sites possess the BBDG-SPD should acknowledge that planned and potential strategic infrastructure will change the existing landscape framework. We contend that for new settlements of the scale proposed by the BBLP 2040 landscape type and landscape character areas are not the most appropriate reference to “creating beautiful and distinctive places with a consistent and high quality standard of design” as required by the NPPF. Paragraph 130 c) of the NPPF states, “Planning policies and decisions should ensure that developments [inter alia], are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)”. A design guide predicated on landscape type and landscape character areas does not deliver the balanced approach set out in paragraph 130 of the NPPF.</p> <p>We contend that it is also important that the relationship between the BBDG[BBDG]-SPD and the Bedford Borough Local Plan 2040 (BBLP 2040) in respect of the growth and spatial strategy options is clarified, including the amount of weight that will be given to the BBDG-SPD once adopted. It is noted that policies associated with allocations set out in the Bedford Borough Local Plan 2030 (BBLP 2030) require the submission and agreement of design codes. Policy 20 – design quality and principles, also states that development proposals for residential developments of over 200 dwellings would be expected to be guided by a design code to be agreed as part of the application process. Clarification on how the design guide will relate to and influence the production of design codes is required. It is acknowledged that page 7 of the consultation sets out the proposed contents of the design guide and includes a proposed section titled ‘explanation of its relationship to design coding of specific sites’ which would go some way to answering the above concern.</p> <p>Conclusions</p> <p>The overall principle of the design guide and BBC’s aim to ensure future development is well designed and integrated with the built and natural environment is in accordance with national guidance. However, the proposed use of landscape character types identified within the landscape character assessment does not provide a suitable framework for new settlements which include more than one landscape character type and</p>	<p>It is acknowledged that new settlements have the potential to create new communities as well as their own distinct character. The design guide is not intended to curtail creativity or innovative design. It will provide analysis of the character areas in the Borough, and design principles based on that analysis. Those delivering any new settlements in the Borough will need to have prepared and agreed master plans, design codes and other relevant design documents specifically relating to that development; this design guide does not preclude that. The relationship between the design guide and design codes is explained in the ‘National &amp; Local Policy Context’ and in national guidance</p>

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		multiple landscape character areas. The BBDG-SPD should provide separate guidance for allocated new settlements.	
Environment Agency	Sustainability Appraisal Scoping	We agree with the conclusions that have been reached.	Noted.
Wilstead Parish Council		<p>Your email below didn't give much time for a response from Wilshamstead Parish Council in view of the need to copy to all and receive feedback. As you say you require a response by the deadline for responses to the Local Plan 2040 consultation (i.e. today) I can advise my first reaction below and if we have any more comments I ask that these be taken into account up to two weeks from the deadline.</p> <p>I have had to concentrate on the effect for Wilstead rather than for the whole Borough and would advise the following:</p> <p>Wilstead would fall into two of the categories shown in your APPENDIX A: SUMMARY OF SETTLEMENTS INCLUDED.</p> <p>The majority of the village would fall into Type 5: Clay Vales and should be shown within Section 5E The very Northern part of Wilstead Woods (still within the Borough) should fall into Type 6: WOODED GREENSAND RIDGE. You state that there are no existing settlements in Bedford Borough in this landscape which is strictly speaking incorrect as West Park Farm would count within it.</p> <p>We ask therefore that any design strategy takes into account these two categories for Wilstead.</p> <p>It is not at all clear how you would comment on "the settlement pattern and built character and analysis of housing character and material" in Wilstead as it is unlike other settlements in the same area – unique in its mixture of listed buildings and different styles of housing. I would suggest that this analysis is much better left to a description in the Neighbourhood Plan which is likely to be "made" early in 2022.</p> <p>However, if you are to continue with the analysis we should like Wilstead to be considered separately from Shortstown (which is also included within Section 5E) and we look forward to your analysis of visual and perceptual character, cultural pattern and historic character &amp; settlement pattern and built character for the village.</p>	<p>The consultation was carried out in accordance with the Council's Statement of Community Involvement. All comments returned on the scope of the SPD have been taken into account.</p> <p>The purpose of the analyses of settlements will be to determine their pattern and character. The villages in the borough are diverse in character and this will be reflected in the analyses. The design guide will be a supplementary planning document when adopted. Its purpose will be to support policies in the development plan, of which made Neighbourhood Plans are a part. It is not intended to 'overwrite' any neighbourhood plan policies, rather to raise the profile of and support the application of design policies.</p>
Gladman Development Ltd		This representation is submitted in response to the Scoping consultation being undertaken by Bedford Council in respect of the Bedford Borough Design Guide. Gladman welcomes the opportunity to comment on the Design Guide at this early stage and would welcome the opportunity to engage further with the	

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		<p>planning policy team and participate in any future engagement events, noting the intention for a draft document to be published in late 2021 with the view to its adoption before the end of March 2022</p> <p>Context Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure throughout the country and has considerable experience in delivering sustainable housing developments. As such, we are very interested in learning more about how we can contribute towards the delivery of well-designed places.</p> <p>Good design is a key aspect of sustainable development, is indivisible from good planning, and contributes positively to making places better for people and communities. It is essential in delivering attractive and high-quality environments that support social cohesion and inclusion and enable people to live healthy and active lives.</p> <p>Following the Planning White Paper, and reports by the Building Better, Building Beautiful Commission, Gladman intends to “deliver beauty, refuse ugliness and promote stewardship” (BBBC, 2020: iv).</p> <p>Gladman encourage applications promoting:</p> <ol style="list-style-type: none"> <li>1. Place-making</li> <li>2. Generating sense of community</li> <li>3. Sustainability</li> <li>4. Healthy living</li> <li>5. Adaptability</li> </ol> <p>We agree with the BBBC which mandates that “beauty is the benchmark that all new developments should meet”.</p> <p>Design Guide Scoping Document, July 2021 The consultation document identifies that the Design Guide will set out the national design context and the new National Design Guide and Model Design Code. It will also be important for the Design Guide to take into account the July 2021 revisions to the NPPF, which were intended to implement policy changes in response to the Building Better Building Beautiful Commission “Living with Beauty” report. In particular NPPF Chapter 12: Achieving Well-designed Places. This chapter brings the focus to the creation of beautiful places and high-quality design, it also provides the impetus for Local Planning Authorities to prepare design guides or codes consistent with the principle set out in the National Design Guide and ensure that they reflect local character and design preference. As such while reference to the National Design Guide and Model Design Code is important the Council must make reference to the NPPF.</p> <p>Gladman notes at paragraph 2.5 and Appendix A of the consultation document that the Council intends to choose a settlement in each landscape character area to provide analysis and guidance. In this regard, it will be important that the findings of any such work and the final guidance that is presented recognises that there will be a wide range of solutions to achieving well designed places within any one</p>	<p>Noted.</p> <p>Agree. Reference to the NPPF will be included in the guide.</p> <p>Noted. The design guide is not intended to curtail creativity or innovative design. It will provide analysis of the character areas in the</p>

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		<p>landscape area and that the design merits of a proposal must be considered in its own unique context. It will be important for flexibility to be embedded into the Design Guide to ensure that it can serve as a set of guiding principles rather than an overly prescriptive or rigid set of rules. This also applies for the local distinctiveness areas selected by the Council at Figure 2 of the consultation document.</p> <p>Relationship with the Bedford Local Plan 2040            Within the consultation document, a number of design policies from the Local Plan 2030 are identified, reflecting that the Design Guide will initially be working within existing policy and guidance. While it is necessary for the design guide to be brought forward within the current framework, it is important that it is prepared with sufficient flexibility to adapt to any changes that may need to be brought forward through the emerging Local Plan 2040 and the Oxford-Cambridge Arc Spatial Framework, both of which are now being actively progressed. The consultation document acknowledges that the Borough will be required to accommodate major development through the new local plan as well as its strategic location within the Oxford-Cambridge Arc. The final Design Guide must therefore position itself to be easily adaptable to this changing policy context to ensure that it can guide the development industry in preparing proposals for well-designed places from the inception of any future scheme.</p> <p>Next Steps            Gladman welcomes the opportunity to comment on the Borough Design Guide Scoping Consultation. We support the preparation of the document and look forward to engaging with the Council further as its work on the project is progressed. We trust you have found this letter informative and useful. Gladman is committed to supporting good design through our development proposals and to working with councils through plan making and the development management processes to achieve this. Should the Council have any queries or wish for clarification on any of the points raised, please do not hesitate to contact myself or one of my colleagues. Thank you for your time and we look forward to hearing further as your work on the Borough Design Guide progresses.</p>	<p>borough, and design principles based on that analysis.</p> <p>Noted.</p> <p>Noted.</p>
Historic England	Sustainability Appraisal Scoping	<p>Thank you for inviting Historic England to comment on the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Screening Report for this SPD. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the SPD) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.</p> <p>The Screening Report indicates that the Council considers that the SPD will not have any significant effects on the historic environment, because it provides guidance on existing Local Plan policy, which has been subject to Sustainability Appraisal via the formal adoption process. The Design Guide will not itself provide new policy, nor will it result in development that would be contrary to the existing policies. We therefore consider that it is</p>	Noted.

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		<p>unlikely the Design Guide SPD will independently have significant effects on the historic environment.</p> <p>On the basis of the information supplied, Historic England concurs with the Council that the preparation of a Sustainability Appraisal is not required.</p> <p>The views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for an SA is made.</p> <p>We should like to stress that this opinion is based on the information provided by you with your correspondence dated 06 August 2021. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the SPD) where we consider that, despite the SA, these would have an adverse effect upon the environment.</p>	
Historic England	Para 2.1	<p>Thank you for consulting Historic England about the Bedford Borough Design Guide Scoping. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. We therefore welcome the opportunity to review this Scoping document at this early stage in the development of the Design Guide.</p> <p>As you will be aware, paragraph 190 of the National Planning Policy Framework sets out that "plans should set out a positive strategy for the conservation and enjoyment of the historic environment...". As part of the local plan framework for Bedford, we consider that this Design Guide SPD should also contribute to that positive strategy, taking into particular account the importance of local character and distinctiveness and drawing on the contribution the historic environment makes to the existing character of the borough to inform high quality design.</p> <p>With the above in mind, we welcome the production of the Design Guide, and would like to make the following comments on the Scoping document and its proposed contents as set out from paragraph 2.1 onwards:</p> <p>We welcome the inclusion of reference of the recently published National Design Guide and Model Design Code. These documents set out the government's best practice guidance on the production of both types of documentation, and provide useful examples of content, layout and approach. We are concerned that the Scoping document mentions local guidance entitled 'Achieving Quality in Residential Layouts (1997). Whilst the inclusion of relevant local guidance is useful where it supports high quality and sustainable development, we are concerned that this documentation is over 20 years old. It may not, therefore, reflect best practice in terms of urban design and highways design in particular, and could be at odds with the guidance set out in the two national documents above. We would recommend that reference is instead made to Manual for Streets 1 and 2, themselves now over ten years old but still reflecting the government's most recent documentation for urban design guidance in new and existing places. We would also suggest that reference is made to Historic England's</p>	The design guide will replace Achieving Quality in Residential Layouts once it is adopted.

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		<p>advice on public realm and highways design in historic places; Streets for All (2017) where relevant. This can be found here:  <a href="https://historicengland.org.uk/images-books/publications/streets-for-all/">https://historicengland.org.uk/images-books/publications/streets-for-all/</a></p> <p>We are pleased to note that landscape character is being taken into consideration as part of the Design Guide scope. The local geology, land form, and hydrology play a key part in the development and evolution of historic places, particularly reflected in the use of vernacular materials or the arrangement of rural agricultural landscapes around settlements, and is fundamentally linked to the morphology of the settlements themselves. We would recommend that Historic Landscape Characterisation data, where available, is also considered as this provides greater definition and detail regarding the close relationship between 'natural' landscape and heritage, which taken together underpins local character.</p> <p>We welcome the intention to identify and set out the individual characteristics of each settlement. Where appropriate this should take account of information contained in the relevant conservation area appraisals. Where these are not available for designated conservation areas, we would recommend that appraisals are undertaken. Where there are historic, but undesignated, settlements, we would recommend that an historic area assessment or similar process is undertaken to provide robust evidence for the design guide's content in terms of guidance on materials, built form, and relationships of buildings to streets and spaces (urban spaces and landscapes). Historic England's advice "Understanding Place: Historic Area Assessments (2017)" provides detailed advice and guidance on this process, which may be useful. This can be found here:  <a href="https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/">https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/</a>.</p> <p>We would be pleased to review the draft of the Design Guide in due course, and we trust the above is helpful. Please contact me if you have any queries.</p>	<p>The design guide will not cover areas already covered by a Conservation Area Appraisal. It is considered that where an appraisal is present it would be a more appropriate guide for development in those areas.</p>
Individual	General, para 1.4	<p>1. Purpose and objectives of the design guide need to be included</p> <p>There needs to be a section included to state the purpose and objectives of the design guide, which needs to include statements to the effect: -</p> <ul style="list-style-type: none"> <li>• Developers will be bound by the guide.</li> <li>• All planning applications will need to state how the application conforms to the design guide and to break this down into the 10 characteristics as stipulated in part two of the National Design Guide</li> <li>• Planning applications which do not conform to the design guide will be rejected. The community in Bedford need to have confidence that this design guide will be upheld and have meaning to it.</li> <li>• What size and what type of development will trigger a further public consultation on the detail of the design for a particular development.</li> </ul> <p>Bedford needs a design guide and codes (see below) with real meaning and written in a way that has tangible understanding to them to both developers and the community. As Bedford council has not mentioned creating a</p>	<p>The guide will be a supplementary planning document and support policies in the development plan. It will be a material consideration and carry weight in planning decisions.</p>

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		<p>design code, with more refined detail on design, but only creating a design guide which will “provide general guidance on what would be expected of new development in particular areas” [page 2 of the Design Guide Scoping Document], I am very concerned that this guide will end up being a tick box exercise to comply with central government requirements, but in reality, after it has been created, it will be buried away and forgotten about. Existing documents - Bedford Conservation Character Appraisal of 2008 and Bedford Landscape Character Assessment of 2014 – were not used, or at least to any apparent or explicit extent, in the creation of the North Riverside development. When I attended the inspectors meeting of the Local Plan 2030 for Bedford Borough in June 2019, the Bedford council representative for the design sections of the plan had not even heard of the Bedford Conservation Character Appraisal of 2008 and Bedford Landscape Character Assessment of 2014. This to me illustrated a woeful lack of competence, let alone any sense of ambition for creating good design for Bedford.</p>	<p>The design guide will provide an analysis of character areas in the borough as well as general design principles based on that analysis. It will include instructions on how the guide should be used when considering development. Design codes will be expected to provide a more site/area specific analysis.</p> <p>All technical documents (including the Bedford Borough Landscape Character Assessment and Conservation Area Appraisals) continue to inform decision making in the Borough in line with adopted policies which were found to be sound at examination.</p>
Individual	Figure 2	<p>We need two design codes: - one for Bedford Town Centre and one for Kempston High Street and there should be public consultation on these codes</p> <p>Design code for Bedford Town Centre On Figure 2, page 14, For the area 1, coloured in pale blue and in addition, to also cover the length of the river from County Hall down to Newnham Bridge, plus the full length of Midland Road and Ashburnham Road to include the train station, we need a design code, to provide the level of detail required to make a meaningful document.</p> <p>The level of detail on design in the proposed guide is insufficient to provide real meaning and understanding in the community on what they can expect from future developments and continues to leave the door wide open for future developers to get away with getting all manner of inappropriate designs approved.</p> <p>Creating a design code specifically for Bedford Town centre will be key to creating a vision, strategy and overall masterplan for the town.</p> <p>Over the last few decades in Bedford Town Centre, there has been no vision or joined up thinking and each development reinforces the piecemeal and haphazard approach to development. The North Riverside</p>	<p>A design guide rather than a design code is being prepared. The design guide will be a borough wide document. It will be necessary to create an analysis and general principles for the character areas in the Borough before more area/site specific design codes can be produced. This approach is established in national design guidance.</p>

Respondent	Doc Reference	Comment	Council Response
		<p>development, is an uber modern design, but along the High Street redevelopment is focusing on heritage. The North Riverside site was never appropriate for an uber modern design, as it sits immediately next to historic buildings along the riverside and the white foot bridge – the ugliest bridge I have ever seen – is a few metres away from the beautiful historic town bridge.</p> <p>What is Bedford trying to be in design terms? It seems that there is no thought or plan to the design identity for Bedford town centre.</p> <p>Design code for: Kempston High Street: from the King William Pub to the end of Addison Howard Park, opposite Spring Road.</p> <p>Kempston is a town in its own standing; we have a Town Council. Kempston has a busy High Street that has continuously been neglected with independent shop owners seemingly left to their own devices to put whatever type of design and colour they want to shop facades. This creates inconsistency in appearance, and generally make the area look very unattractive and inhospitable. Its nearly as bad as Midland Road in Bedford.</p> <p>The shops opposite Addison Howard Park are occupied in pre-War buildings, as are many of the other shops along the High Street. As Bedford High Street is undergoing a heritage redevelopment; this should be done in Kempston, too. If we receive the £14.9 million from the Government's 'Levelling Up Fund', this should be spent wisely and a design code would help ensure we maximised best use out of this money.</p> <p>I fear this fund could end up being given to a contractor to repave the Saxon centre and put in a few planters, as generally any mention of improving Kempston, all focus goes to the Saxon Centre, but we need to focus on all of the High Street. Please seize the initiative on this and stop letting Kempston be the poor relation of Bedford. As a lifelong resident of Kempston, I would be happy to volunteer to input into creating this design code, as indeed I would for Bedford Town Centre.</p>	<p>The design guide will provide analysis of the character areas in the borough, and design principles based on that analysis. It will provide cues for future development and advice on what will be expected of development so that it can be integrated with the surrounding character.</p>
Individual	Figures 1 and 2, para 2.6	<p>Adjustments to the local distinctiveness areas</p> <p>3a. Adjustments to the local distinctiveness areas: define the boundary of the Town Centre As per (2) above, the Town Centre (section 1 / pale blue on Figure 2) needs to include: -</p> <ul style="list-style-type: none"> <li>• The Full length of Midland Road</li> <li>• Ashburnham Road because it has the train station there, a gateway into Bedford</li> <li>• The riverside from County Hall down to Newnham Bridge</li> </ul> <p>Whilst within the above areas there are lots of different types of distinctiveness in terms of the types of building, there is a common distinctiveness in terms of the purpose, i.e. to act as town centre, we need to create boundary for the town centre, which in turn can be used to create a vision, strategy and design code for the town centre.</p> <p>3b. Adjustment to the local distinctiveness area: Kempston High Street needs to be identified as a distinct area</p>	<p>The light blue area represents the conservation area of Bedford. The design guide cannot alter this boundary. The local distinctiveness areas are areas that contain a common, albeit not uniform, character rather than being defined by use.</p> <p>For the purpose of this design SPD, the local distinctiveness</p>

Respondent	Doc Reference	Comment	Council Response
		<p>The High Street in Kempston needs to be identified as an area in its own right, covering the length from the King William Pub to the end of the Addison Howard Park, opposite Spring Road. Whilst lots of different type of buildings are along the High Street, by not ring-fencing the high street as a distinct area for its purpose as the focal point of the town, it will mean that there is not a joined-up plan, vision and legend for the town.</p> <p>4. Proposed template analysis: - Use the ten characteristics of a well-designed place in the National Design Guide as a framework for analysis and creating a design guide for each area.</p> <p>In figure 1: Template of rural settlement analysis, pages 10-12 and in figure 3: Template of urban area analysis Local distinctiveness area code, page 16 of the scoping document, it would be useful to breakdown the analysis into further levels of detail and use the ten characteristics of a well-designed place in the National Design Guide, namely: -</p> <ul style="list-style-type: none"> <li>■ Context – enhances the surroundings.</li> <li>■ Identity – attractive and distinctive.</li> <li>■ Built form – a coherent pattern of development.</li> <li>■ Movement – accessible and easy to move around.</li> <li>■ Nature – enhanced and optimised.</li> <li>■ Public spaces – safe, social and inclusive.</li> <li>■ Uses – mixed and integrated.</li> <li>■ Homes and buildings – functional, healthy and sustainable.</li> <li>■ Resources – efficient and resilient.</li> <li>■ Lifespan – made to last</li> </ul> <p>In the above areas include analysis on any aspects of what is not regarded as good design (see also 5 below), so that these particular aspects are not replicated in future design and lessons are learnt from past mistakes, or indeed how design has evolved.</p> <p>5. Consider when it is and when it is not appropriate to use the characteristics of existing development as the template for future development in a particular area / vicinity.</p> <p>To achieve good design from future developments, it may not always be appropriate, to be guided by the characteristics of existing nearby development. Existing development in the vicinity could be poor design – and there are a lot of examples of that in Bedford – and so it would not achieve a good outcome to continue to expand on the area that has been poorly designed. For example, the Park Inn Hotel along the Embankment in Bedford – is a very tall building, of concrete appearance and very close to riverside. Many Bedfordians would say that this is one of the eye-sore’s of Bedford, due to material and its height. I would therefore argue that it was not appropriate to replicate this design feature at the North Riverside by building another tall hotel</p>	<p>areas are intended to represent areas of a similar physical character rather than buildings with a similar purpose or use. Individual schemes will be expected to show, through the use of more detailed design codes where appropriate.</p> <p>Noted. Agree that the design guide should be drafted in general conformity with the National Design Guide, including the 10 characteristics of a well-designed place.</p> <p>Noted. The design guide is not intended to curtail creativity or innovative design. It will provide analysis of the character areas in the borough, and design principles based on that analysis.</p>

Respondent	Doc Reference	Comment	Council Response
		<p>(Premier Inn), with another material that does not fit into its setting. In the analysis of the rural settlement analysis and local distinctiveness area analysis, it would be useful to include any aspects of what is not regarded as good design, so that this is not replicated in future development.</p> <p>6. Public consultation and review</p> <p>The design guides and codes should be subject to public consultation and there should also be a review section included in them, stating the process and timescales for review. Review should include public consultation.</p>	<p>The draft design guide and any future review of it will be subject to public consultation. Future updates of the SPD will be based on on-going monitoring of its effectiveness</p>
Individual	General	<p>I now respond to your design guide following my latest Borough Plan submission. After spending several days trying to get to grips with the parefenalia including a visit to the Bedford offices, I have only come to one conclusion---it is totally baffling &amp; how the general public is expected to digest &amp; make sensible comments on it all just leaves me stunned! Suffice it to say that your surveying dept. should make the decisions on design in close consultation with the parishes who will know their patch &amp; what will suit it better than outsider.</p>	<p>Noted. Parish Councils will continue to be consulted on planning applications and policy documents.</p>
Individual	General	<p>Hello design guide posse</p> <p>Thanks for the invitation for local people to contribute to this document.</p> <p>One suggestion for the guide: the scoping document doesn't seem to reflect that design quality must include accommodation of travel modes reflecting national policy in Gear Change (inc 1 year review) and LTN 1/20. authorities who do not make adequate provision for active travel modes are at risk of losing highway funding (not just funding for active travel schemes) so it's important that all policies reflect this aspect of policy too. Highway Code changes make this even more important.</p> <p>There have been too many developments that may be perceived as visually attractive (and many that are not) but make no provision for active travel. examples include:</p> <ul style="list-style-type: none"> <li>- Ropewalk development where little evidence of thought given to walking or cycling between the two sides of the internal roundabout. footway was initially in place but in a place, users could not see and did not use. zebras added as an afterthought years later.</li> <li>- Goldington road development where planning was granted with little thought to walking between Wickes and Homebase (now B&amp;M) except through the loading area or cycling from Wickes/Waitrose/B&amp;M to Tesco.</li> <li>- Interchange retail park where no safe access for cyclists was provided and no pedestrian route at all - leading</li> </ul>	<p>Noted. Adopted planning policies encourage active/sustainable travel however site-specific schemes will differ on an individual basis.</p> <p>Where required, area/site specific design codes will address methods of sustainable travel.</p>

Respondent	Doc Reference	Comment	Council Response
		<p>to lots of people walking in the verge until a footway laid much later.</p> <p>I urge BBC to ensure that all new and existing policy addresses all road user groups which picks up safety; carbon; air quality, public health (mental/physical health), car dominance of neighbourhoods (good design puts car parking away from walking/cycling, and reduces visual dominance/clutter of parked vehicles) etc.</p>	
Individual	para 1.6	<p>I read with interest your scoping document for the new Bedford Borough Council Design Guide and thank you for the opportunity to comment. Unfortunately, I believe that there are a number of key areas which haven't been fully considered within the scoping document and that generally it represents a missed opportunity for promoting key areas of design that could significantly impact on issues facing our communities in the longer-term (including climate change, health and obesity).</p> <p><b>Biodiveristy</b>  Policy 28s (vi) and Policy 29 (vii) both refer to avoiding adverse impact or minimising the effects on biodiversity. This does not go far enough. The new IPCC Climate Change report should embolden councils to take a pioneering role to preserve and enhance biodiversity. Your Planning Department and this Design Guide offers an opportunity to ensure that developments not only minimise impact on diversity but take a positive and proactive approach; improving and championing diversity within developments and looking at ways we can increase habitats etc.</p>	<p>The purview of the design guide is to provide analysis and guidance for the character and design of prospective future development. The development plan as a whole seeks to create healthy, mixed use, sustainable communities through its policies. It contains robust policies relating to biodiversity, climate change and need for active travel.</p> <p>The design guide will support the application of the policies related to place making and design and will include principles relating to modern methods of construction and climate resilient design.</p>
Individual	Para 2.1	<p><b>Sustainable Lifestyles</b>  The National Guidance contains a range of measures to promote sustainable lifestyles and energy efficiency, conserve resources, minimise carbon emissions and utilise renewable energy. The scoping document does not emphasise these areas enough. As with Biodiversity this Design Guide offers an opportunity for Bedford Borough Council to take a stand, make a difference and ensure that addressing the climate change crisis is at the heart of planning policy; ensure that new developments maximise opportunities to reduce climate change and promote sustainable lifestyles.</p>	<p>The design guide will support the design policies in the development plan. The development plan contains robust policies relating to biodiversity and climate change. References will be included to modern methods of construction renewable energy.</p>

Respondent	Doc Reference	Comment	Council Response
Individual	para 2.1	<p>Play The scoping document has no reference to play. Yet the new national guidance (Policy N1) emphasises the need to 'provide a network of high quality, green open spaces with a variety of landscapes and activities, including play'. Play is clearly identified as a key part of green open space (both formal and informal) within national guidance and not referring to it in the scoping document is a huge oversight.</p> <p>Bedford Borough Council has a poor track record at providing high quality and consistent standards of play across developments with play compromised at the expense of housing. For example, Shortstown has a significant deficit of play facilities, acknowledged by your Planning Team. It appears that the requirements for play were not emphasised / enforced in early developments and then the deficit cannot then be addressed through subsequent developments. As a result, the play provision for young people is extremely poor, especially compared to the Wixams (where expectations for play were enforced by the Central Bedfordshire Council leisure and planning teams).</p> <p>Given the worsening national crisis with childhood obesity and the public health implications of that, it is imperative that play, GI and recreational open space is given a clear priority within the Design Guide.</p>	<p>Agree that the inclusion/enhancement of play areas as part of new development is important and robust, adopted development plan policies are already in place to address these concerns (Allocations and Designations Local Plan Policy AD28).</p>
Individual	para 2.1	<p>Community Safety Policy 29 (vii) refers to measures to incorporate community safety into design. I do not believe that this goes far enough and often community safety is eroded by design preferences. An area perceived as unsafe will rapidly lose civic pride and will gradually deteriorate visually so it makes sense to ensure that the principles of 'Secured by Design/ Designing out Crime' are highlighted early on as a priority element within the design guide.</p>	<p>Noted. The guide will refer to the council's Community Safety Design Guide. The Police Architectural Liaison Officer is consulted on all major development schemes</p>
Individual	para 2.1	<p>Mix of Uses The National Guidance (Policy U1) emphasises that successful communities require a range and variety of local services and community facilities including schools, nurseries, workplaces, healthcare, spiritual, recreational, civic and commercial uses. I think that the Design Guide could go further in emphasising the need to provide a proper mix of facilities in new developments. It is clear that the extensive developments in southern Bedford have led to a real deficit of secondary school places, recreational facilities and other public amenities. There should be a clear emphasis on ensuring that future developments fully take into account local needs and that planners enforce S106 agreements properly to ensure that these facilities are actually provided.</p> <p>I really do hope that Bedford Borough take this opportunity to be a pioneering council and work boldly to ensure that our community can grow in a healthy and sustainable manner.</p>	<p>The purview of the design guide is to provide analysis and guidance for the character and design of prospective future development. The development plan as a whole seeks to create healthy, mixed use, sustainable communities through its policies. The design guide will support the application of the policies related to place making and design. It cannot change</p>

Respondent	Doc Reference	Comment	Council Response
			existing or introduce new development plan policies.
Individual	General	This exercise is meaningless unless it is prefaced by the removal of that lopsided motorway-style bridge across the river at Riverside North and its replacement with something resembling the original for which consent was first given. Only then can any resident believe in the sincerity of this process.	Noted.
Natural England	Sustainability Appraisal Scoping	Thank you for consulting Natural England on the Bedford Borough Design Guide Scoping consultation. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England has no comments to make on this application, but we support the views made by the Local Nature Partnership (LNP).	Noted.
Individual	General	<p>I apologise for responding so close to the expiry date/time for the scoping consultation process however there is only one area that I'll briefly comment on – rapidly increasing flood risks bought on by (suspected) human driven climate change.</p> <p>Because of the aforementioned increasing flood risks I believe there is a significant flaw within the Bedford Borough Design Guide, all future development should only be planned for higher ground elevation areas – this should include areas within the borough that are not close to rivers/water courses.</p> <p>I respectfully suggest that for the purposes of planning the borough uses a metric that is based on Met Office metrics for categorizing a red warning for rainfall. If an area is unable to sustain rainfall (without causing flooding) for at least the lowest measurement for a red warning category – then development within that area should not be considered – unless tried &amp; tested (robust) flood defences are to be included in the proposed development.</p> <p>In Wootton there have been many recent developments and I have noticed that during heavy rainfall both the Little Wootton development by the Upper School and the Cranfield Road development struggle to cope. I have never seen a Met Office red warning for rain that covers the Wootton area, however in late 2019/early 2020 we had prolonged/heavy rainfall and it was reported that 'large/deep' puddles of rainwater were very close to breaching the fronts of some houses on both developments, this was also the case for Keeley Bakery that's situated adjacent to the Chequers pub – I've no doubt that properties would have flooded had the rainfall met red warning metrics!</p> <p>I have huge sympathy for victims of flooding - recovery takes months, the cost is not insignificant &amp; the emotional pain/stress cannot be nice. I hope borough planners make the right choices, I appreciate it cannot be easy – we need open green spaces with trees between housing areas so that flood water can be soaked</p>	<p>The purpose of the design guide SPD is to support the application of the Council's design policies. It cannot set new development plan policies for the consideration of flooding.</p> <p>However, the Council considers flood risk in its site allocations through the local plan and through planning applications. There is a duty to demonstrate that future development will be safe for its lifetime and will not increase flood risk elsewhere. The council has planning policies to ensure this is the case.</p>

Respondent	Doc Reference	Comment	Council Response
		up/drained away. At one time there was a proposed development for 81 dwellings near to Wootton Upper School, whilst I opposed that development for many reasons – that site would be far better for coping with heavy/prolonged rainfall compared to site 314 along Hall End Road.	
Staploe Parish Council	para 2.1	I have read this and there is no mention of eg. low carbon design, renewable energy eg. solar panels on roofs, ground source heating, or electrical charging points. Would this be found elsewhere in a different design guide? Also, we are concerned about proposals for development of Dennybrook in our parish. Would the design guide be expected to set out how a large strategic allocation such as that would be designed / managed? If not here then where would be expect to find the policies that would apply to building a large new settlement?	The design guide will contain information on modern methods of construction, low carbon & climate resilient design (Principle 1). A new settlement would require the production of a site specific design brief and more detailed design codes before development could commence.
Staploe Parish Council		<p>Policy 29: should also include:</p> <ul style="list-style-type: none"> <li>• In addition to being of the highest design quality, the design should create carbon neutral dwellings and avoid fossil fuel use. There should be reference to renewable energy and electric vehicle charging points requirements. We also believe it is important to have sufficient car and bike parking in new developments. Many households have 3 cars.</li> </ul> <p>Para 2.3:</p> <ul style="list-style-type: none"> <li>• There may need to be further sub-subdivisions within the proposed landscape areas, to cater for distinctive differences within a landscape character area. Alternatively more than one reference settlement could be chosen in a landscape character area so that distinctively different parts are appropriately represented (see my comments on the Appendix below).</li> </ul> <p>Appendix A:</p> <ul style="list-style-type: none"> <li>• Staploe Parish Council falls into Type 1D Thurleigh Clay Farmland. Thurleigh is suggested as broadly representing the local character of the whole area and that new development would take its inspiration from Thurleigh. Our comment is that the hamlets in our parish of Staploe are far lower density than Thurleigh. Very few areas of our hamlets have houses on both sides of the road and most of the houses have large gardens and often some land associated with them. The LCA also notes that the hamlets often shelter amongst mature trees. These are features which are not typical of Thurleigh. It would therefore be appropriate to further subdivide the Type 1D area further or select more than one reference settlement to recognise the local distinctiveness..</li> </ul>	<p>Policy 29 was adopted as part of the Local Plan 2030 after a public examination. The design guide cannot change policy in the development plan. However, information on design issues relating to parking design and renewable energy will be included in the design guide. Changes to LP2030 Policy 29 itself can be considered when it is next reviewed.</p> <p>Comment noted. It is not possible to include all settlements in the design guide at this stage, however it may be possible to add other settlements in future updates, or for neighbourhood plans to give local guidance on design</p>

Respondent	Doc Reference	Comment	Council Response
		<p>Finally, once the design guide is drafted for each landscape character area we would like the local parish councils in each area to have the opportunity to comment on the document.</p>	<p>issues. For those settlements that are not specifically mentioned, the guide will include instructions on how it should be used when development is being considered. In addition, design codes can be prepared for more specific areas/sites.</p> <p>Parish Councils will have the opportunity to comment on a draft design guide during the next consultation (Spring / summer 2022).</p>
Individual	Paras 1.6, 1.13, 2.3, 2.6	<p>You have asked for comments the Bedford Borough Design Guide SPD Scoping Document dated July 2021. I offer my comments as follows:</p> <p>Policy 28S: should also include:</p> <ul style="list-style-type: none"> <li>• Similar to the Forest of Marston Vale, development should contribute to the creation of the Bedford to Milton Keynes Waterway.</li> </ul> <p>Policy 29: should also include:</p> <ul style="list-style-type: none"> <li>• In addition to being of the highest design quality, the design should create carbon neutral dwellings and avoid all fossil fuel use/heating. There should be reference to renewable energy and electric vehicle charging points requirements.</li> </ul> <p>Para 1.13:</p> <ul style="list-style-type: none"> <li>• I support the idea of promoting and integrating development with the natural environment as a key design principle in the borough from the very beginning. This will be most challenging in the more rural parts of the Borough, where the mere physical aspect of development is naturally in conflict with the treasured rural environment. For example in my very rural parish of Staploe, the BBC LCA recommendations for maintaining the landscape characteristics of the area looks to even avoid kerbing the rural roads to maintain their character.</li> </ul> <p>Para 2.3:</p> <ul style="list-style-type: none"> <li>• There may need to be further sub-subdivisions within the proposed landscape areas, to cater for distinctive differences within a landscape character area. Alternatively more than one reference settlement could be chosen in a landscape character area so that distinctively different parts are appropriately represented (see my comments on the Appendix below).</li> </ul> <p>Para 2.6:</p> <ul style="list-style-type: none"> <li>• Table 1 – there should be a summary from the BBC LCA document for each landscape character area. This</li> </ul>	<p>The design guide SPD cannot change policy in the development plan.</p> <p>Agree. References will be included to modern methods of construction and climate resilient design which has been prioritised (Principle 1) within the draft design guide. .</p> <p>Comment noted. It is not possible to include all settlements in the design guide at this stage, however it may be possible to add other settlements in future updates, or for neighbourhood plans to give local guidance on design issues. For those settlements not specifically mentioned, the guide will include instructions</p>

Respondent	Doc Reference	Comment	Council Response
		<p>should include:</p> <ul style="list-style-type: none"> <li>o Key characteristics</li> <li>o Landscape change</li> <li>o Features/sensitivities</li> <li>o Management guidelines</li> <li>o Development guidelines</li> </ul> <p>Appendix A:</p> <ul style="list-style-type: none"> <li>• My parish falls into Type 1D Thurleigh Clay Farmland. Thurleigh is suggested as broadly representing the local character of the whole area and that new development would take its inspiration from Thurleigh. My comment on this is that the hamlets in our parish of Staploe are far lower density than Thurleigh. Very few areas of our hamlets have houses on both sides of the road and most of the houses have large gardens and often some land associated with them. The LCA also notes that the hamlets often shelter amongst mature trees. These are features which are not typical of Thurleigh. It would therefore be appropriate to further subdivide the Type 1D area further or select more than one reference settlement to recognise the local distinctiveness (see my comments on Para 2.3. above).</li> </ul> <p>Finally, once the design guide is drafted for each landscape character area, will the local parish councils in each area have the opportunity to comment on the document? It would be a stronger document if it had the general support of the local communities to which it would be applied.</p>	<p>on how it should be used when development is being considered. Design codes can be prepared for more specific areas/sites</p> <p>The LCA contains necessary information on the characteristics of each landscape character area. Repeating them in the design guide will increase the size of the document unnecessarily.</p> <p>Parish Councils will be consulted on the draft SPD (spring / summer 2022).</p>
Wootton Parish Council	Para 1.6	Wootton Parish Council recommends the Design Guide should make reference to Local Plan 2030 Policy 59S (Housing Mix) as it seeks to ensure that dwellings are specifically designed to meet the needs of everyone in the community, especially those who are elderly or disabled.	Policy 59S contains the necessary requirements for the provision of a mix of housing. The design guide will not give guidance on the interior design or layout of properties.
Troy Planning on behalf of Colmworth Parish Council	Para 2.5	<p>1.1. The borough-wide Design Guide Scoping Document explains that due to recent updates within the planning system, the government is placing new emphasis on place-making, design and the creation of beautiful places. As a result, more weighting is being given to local authorities to prepare design guides and codes to contribute towards shaping the design of developments within their areas.</p> <p>1.2. In January 2020, Bedford Borough Council adopted its Local Plan 2030, containing refreshed policies on place-making and design. To ensure these policies are reflected within the built environment, and to exemplify how they should be adopted, the council has prepared a borough-wide design guide. It is vital that the design guide incorporates the borough's existing, distinctive characteristics, allowing these to serve as examples for new, future developments.</p> <p>1.3. The Parish Council welcomes the opportunity to engage with Bedford Borough Council and respond to this</p>	The Local Plan 2030 contains policies relating to design. These policies will remain in place after the adoption of the Local Plan 2040 and will therefore continue to guide development. The design guide SPD will support the application of those policies.

Respondent	Doc Reference	Comment	Council Response
		<p>consultation.</p> <p>1.4. It is currently unclear as to why this Design Guide relates only to the Local Plan 2030. Instead, the scope should be on both the adopted Local Plan and the emerging Local Plan. Limiting the scope to just the adopted Local Plan would be a missed opportunity for a more holistic approach to design in the Borough, to at least 2040.</p>	
Troy Planning on behalf of Colmworth Parish Council	General	<p>2.1. The Scoping Document does not allocate space for its own aim. The National Model Design Code specifically states that the vision should be a key part of preparing a design code. Figure 1 below illustrates the seven steps of the design code creation process, with the area needing to be split up “into a set of typical ‘area types’ and deciding on a vision for each of these”. Indeed, the National Model Design Code further confirms in Paragraph 32 that “Design codes need to be based on a vision for how a place will develop in the future”. To be fully integrated with the adopted Bedford Local Plan 2030, and for the document to be widely appreciated, the Parish Council feels a clear vision, aim and key objectives are necessary. By presenting these at the beginning of the document, these will give a clear aim and allow for design principles to be better understood. Whilst the vision could be largely holistic, the objectives should refer to local names to ensure that a place-specific ‘sense of place’ is associated with each of the key development areas within the borough.</p> <p>2.2. As mentioned in the Design Guide SPD Scoping Document, there is no one characteristic that can be used to define Bedford Borough. The Parish Council agrees that the Design Guide should celebrate the diverse characters within the borough and future development should build on the unique characteristics and identities of each settlement and area.</p>	<p>The SPD will be a design guide rather than design code document. Design codes will be prepared for individual developments in accordance with adopted policies.</p> <p>Noted.</p>
Troy Planning on behalf of Colmworth Parish Council	Paras 1.2, 2.6, 2.10	<p>3.1. It is important for the document to provide step by step design considerations for proposals to be critiqued against. These should start with a baseline analysis of the existing landscape character prior to building on the built form details.</p> <p>3.2. The National Model Design Code (2021)<sup>5</sup> provides detailed guidance on the production of design codes, guides and policies, with the aim of promoting successful design. It aims to help local authorities decide what good quality design looks like for them. As highlighted in the Design SPD Scoping Document, the National Model Design Code respects that “quality design does not look the same across the country... by definition, local vernacular differs and design priorities differ for scales and types of development.”</p> <p>3.3. An example of how future developments should be considered against the Design Guide is illustrated in Figure 2 opposite. These are largely based on the Building for Life 12 policies (produced by the Design Council), which sets the standard for the design of new housing developments.</p> <p>3.4. It is evident that the Scoping Document does not currently align with either the Building for Healthy Life 12 policies, or the steps set out in the National Model Design Code. To ensure that future proposed developments are assessed against a robust set of criteria, further iterations of the Design Guide need to conform with the principles set out in both these documents.</p> <p>3.5 The Design Guide should be structured in a way to ensure maximum understanding and appreciation of the borough-wide design concepts. To aid readability, guidance should be set out in a checklist style, as illustrated below in Figure 3. The Parish Council therefore recommends that a clear and prescriptive approach is used to</p>	<p>Agree. The design guide will conform with the 10 characteristics of a well-design place as set out in the national design guide.</p> <p>The SPD will be a design guide rather than design code document. Design codes will be prepared for individual developments in accordance with adopted policies.</p>

Respondent	Doc Reference	Comment	Council Response
		<p>ensure that developers are clear on what is considered good design within the borough. To ensure the Design Guide succeeds in fostering good design, supplementary precedent images, exemplified below in Figure 4, can help to clarify what is considered both 'good' and 'bad' design, affording applicants and decision-makers further clarity for development proposals.</p> <p>3.6. The Design Guide should reference policies contained in the adopted Bedford Borough Council Local Plan 2030, and policies within the emerging Bedford Borough Council Local Plan 2040, throughout the document. This will allow for a clear and concise understanding and interpretation of how design principles can be met by existing and future policies, by applicants and decision makers. These should be well integrated within the document and not contained within their own section.</p> <p>3.7. To provide additional weighting to the Design Guide, it should contain a wide variety of design elements. Whilst this section has detailed crucial elements of how the Design Guide should be structured, the next sections highlight key aspects the updated Design Guide should focus on.</p>	<p>The design guide will contain the principles that future development should conform with to ensure appropriate design in the borough.</p> <p>Local Plan 2030 design policies will be referenced. These policies will remain in place after the adoption of the Local Plan 2040 and will therefore continue to guide development. The design guide SPD will support the application of those policies.</p>
Troy Planning on behalf of Colmworth Parish Council	Paras 2.3, 2.6, 2.7	<p>4.1. One of the most important requirements to be covered in the Design Guide is the need to recognise the existing context of the plan area. Before any proposals for future developments are introduced or considered, the geological, heritage and architectural contexts should be identified.</p> <p>4.2. The Design Guide SPD Scoping Document is right to begin with introducing the landscape character types, based on findings from the Bedford Borough Landscape Assessment (2020) . By doing this first, it allows for sites to be analysed through morphological layers, responding to the landscape first and built form after.</p> <p>4.3. Future iterations of the Design Guide could stress the importance of ensuring places are biodiverse and are beneficial for the local and wider environment. The National Planning Policy Framework confirms that open space "can deliver wider benefits for nature and support efforts to address climate change", with Paragraph 84 in the National Model Design Code affirming that "Design codes will be expected to reflect the minimum 10% net increase in biodiversity compared to the situation prior to development." The Parish Council believes there is substantial room for these points to be incorporated within the Design Guide.</p> <p>4.4. Through an appreciation of surrounding building heights and other key built environment sensitivities, appropriate densities for the proposed development can be established. Developments should ensure that site densities are respective of their surroundings. For instance, if the site in question is greenfield land or has a distinctively rural character, high densities would not be considered appropriate.</p> <p>4.5. Similarly, characteristics of the surrounding architecture should provide important reference points for the style of buildings within new developments. Typically, garden villages and larger site allocations often fail to reference surrounding architectural features and details and materials. It should be clarified that whilst materials should be as similar as possible to provide a seamless integration, allowances for variation within the street scene should be encouraged to ensure interest and contribute towards wayfinding principles. The Design Guide should ensure that these elements are considered for all proposed developments.</p>	<p>The design guide will contain an analysis of the borough based on character areas which take geology into consideration.</p> <p>The design guide will support the design policies in the development plan. The development plan contains robust policies relating to biodiversity and climate change. References will be included to modern methods of construction and climate resilient design in the design guide.</p> <p>The design guide will work alongside design codes for specific sites and more detailed design and access</p>

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			statements. Agree that together, these should address the local context.
Troy Planning on behalf of Colmworth Parish Council	Para 2.6	<p>5.1. Proposals should adopt strong place making principles, with these needing to be clearly set out within the Design Guide. The National Planning Policy Framework notes in paragraph 130d) that planning policies should “establish or maintain a strong sense of place”. In addition, The National Model Design Guide emphasizes that design codes should have a sense of place, with all schemes to be designed to build upon local character and legibility by:</p> <ul style="list-style-type: none"> <li>● “Making use of local materials and detailing;</li> <li>● Incorporating legibility and wayfinding strategies; and</li> <li>● Being guided by a strong masterplan”.</li> </ul> <p>5.2. Future iterations of the Design Guide SPD would benefit from including examples of how to adopt such principles in practice. Indeed, Policy 28S of the Bedford Local Plan 2030 affirms this, stating that development is “expected to contribute to good place-making”, with note ii being of particular relevance to ensure development proposals “have a positive relationship with the surrounding area, integrating well with and complementing the character of the area in which the development is located”</p> <p>5.3. The Design Guide should include clear guidance on how to maximise legibility throughout new developments. This is something typically missing from garden village proposals and larger site allocations, with the former tending to have particularly poor walking and cycling accessibility. By including these as distinct guidance, pedestrians, cyclists and drivers will be naturally encouraged around new developments. Streets and open spaces should together form a network of routes that is legible, well-incorporated and easily accessible, whilst providing variation and choice throughout the development. Routes should be clearly signposted and designed to be welcoming and safe.</p> <p>5.4. It may be beneficial for the Design Guide to introduce street hierarchies for larger settlements within the borough. As the National Model Design Code states in Policy M.1.iii, “different types of streets play different roles in a place”, with the document further confirming that design codes may define the range of street types within key neighbourhoods. Further, the Design Guide should reiterate the guidance produced in Manual for Streets, which aims to create good design through thinking of the streets as key arteries of the public realm. By doing this, it would aid policy-makers in the understanding of the main access routes within these larger settlements.</p> <p>5.5. Following this, it is important to note that well-designed car parking is an essential part of good design and should be considered throughout the design process. When referring to parking strategies, the Design Guide should reference the adopted Parking Standards for Sustainable Communities SPD. However, as the Parking Standards are set out within the Local Plan, the Design Guide can illustrate how to accommodate the Local Plan’s parking requirements. The National Model Design Code affirms this, with policy M.3 stating that Local Design Codes should consider:</p>	<p>The design guide will contain the principles that future development should conform with to ensure appropriate design in the borough.</p> <p>The analysis of the borough will include the settlement pattern and broad street layout</p> <p>Noted. The design guide will include principles that reference current borough standards.</p> <p>Comments on design codes noted.</p>

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		<ul style="list-style-type: none"> <li>● “Acceptable locations and design of unallocated parking;</li> <li>● Accommodation of bays for disabled spaces, electric charging and car share;</li> <li>● Position of on-plot parking;</li> <li>● Guidance on the design of parking for other uses;</li> <li>● The design and location of cycle parking; and</li> <li>● The design of bins and refuse collection services.”</li> </ul> <p>5.6. These aspects could be included within the presentation of street hierarchies, confirming the design of parking to be appropriate in different locations.</p>	
Troy Planning on behalf of Colmworth Parish Council	General	<p>6.1. The Design Guide should ensure sustainability is at the forefront of development proposals. The recently updated National Planning Policy Framework clearly highlights in Paragraph 11 that there is to be “a presumption in favour of sustainable development” , with Paragraph 16 a) affirming that “plans should be prepared with the objective of contributing to the achievement of sustainable development”.</p> <p>6.2. Indeed, the Borough Council should consider the three objectives in achieving sustainable development - the economic, social and environmental objectives highlighted in Paragraph 8 of the National Planning Policy Framework. There are significant opportunities to build on these and incorporate beneficial policies within future iterations of the Design Guide.</p> <p>6.3. The Design Guide should guarantee that opportunities to include sustainable forms of travel are maximised. Whilst it remains an important consideration, the focus of movement should no longer be on the private car, but instead on walking, cycling and shared transport options. This is presented in Chapter 9 of National Planning Policy Framework, which ensures policies and proposals focus on Promoting Sustainable Transport. In addition, policy M.2 in the National Model Design Code recognises the need for Active Travel, prioritising walking and cycling and making it “easy, comfortable and attractive for all users.”</p> <p>6.4. However, it would be beneficial for the Design Guide to present a way of measuring sustainability, to prevent development proposals claiming to be sustainable when they are in fact reliant on private cars for access. This is typically the case with garden village schemes and larger site allocations, with the remoteness of sites favouring unsustainable travel patterns. Future iterations of the Design Guide SPD could integrate 20-minute city concepts, which enable residents to meet all their needs within a short walking or cycling distance from their home, being summarised as a “complete, compact and connected neighbourhood”.</p> <p>6.5. Further, clear guidance should outline approaches to mitigate the effects of climate change. Indeed, this is outlined by Bedford Local Plan 2030 in Objective 4.1 which aims for development to be able to respond to the impacts of climate change. Further, the Living with Beauty report<sup>22</sup> contains government guidance including ideas of ‘recycling buildings’, preferring existing buildings to be repurposed instead of rebuilt. By incorporating some of the principles highlighted within the report, the future Design Guide would ensure that development proposals not only respect their existing context but reduce the need for ‘embodied energies’.</p> <p>6.6. Similarly, the new Design Guide should ensure that development proposals are suitably energy efficient. Policy 54 in the Bedford Local Plan 2030 affirms that “new developments of more than 10 dwellings are required</p>	<p>The design guide SPD will support the implementation of development plan policies which cover the issues raised in this response including the need to incorporate active travel options.</p> <p>The design guide will support the design policies in the development plan. The development plan contains robust policies relating to climate change. References will be included to modern methods of construction and</p>

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		to achieve a 19% reduction in carbon emissions” . However, to show a renewed commitment to energy efficiency, the National Model Design Code states that “design codes can include a local energy hierarchy based on energy efficiency standards, renewable energy sources and renewable energy networks, following a ‘fabric-first’ approach.” As a result, the new Design Guide could be more aspirational than the Local Plan 2030.	climate resilient design in the design guide.
Troy Planning on behalf of Colmworth Parish Council	General	<p>7.1. The National Planning Policy Framework states clearly within Chapter 8, that planning policies and decisions should aim to achieve healthy, inclusive and safe places. In particular, paragraph 92b) affirms that these be “safe and accessible... through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas”. The Design Guide Scoping Document has room to build upon this and presents opportunities to “provide a framework for healthy, greener, environmentally responsive, sustainable and distinctive places”.</p> <p>7.2. The Design Guide includes limited reference to the role that communities play in sustaining the social life of places. According to the National Model Design Code, the guide provides an opportunity to “support the positive delivery and integration of community spaces into the urban fabric”.Indeed, paragraph 148 affirms that “Design codes could seek to facilitate a mix of uses that reflect local needs and support community life”, with Policy U.3.ii within the Design Code providing examples of these community facilities which should be identified and considered within Bedford Borough Council’s Design Guide.</p>	<p>The purview of the design guide is to provide analysis and guidance for the character and design of prospective future development. The development plan as a whole seeks to create healthy, mixed use, sustainable communities through its policies. The design guide will support the application of the policies related to place making and design.</p> <p>Site specific design codes will be required for larger sites in accordance with adopted policy.</p>
Troy Planning on behalf of Colmworth Parish Council	Para 1.8	<p>8.1. The Design Guide should reference key guidance produced by Bedford Borough Council to ensure that developers understand which documents they need to conform with.</p> <p>These include, but are not limited to:</p> <ul style="list-style-type: none"> <li>● Open Spaces SPD30;</li> <li>● Accessible Environments31;</li> <li>● Shopfronts and Advertisements in Conservation Areas Supplementary Planning Document; and</li> <li>● Parking Standards for Sustainable Communities: Design and Good Practice SPD.</li> </ul>	Agree. The design guide will reference other council guidance documents.
East of England Ambulance Service	General	<p>Bedford Brough Design Guide</p> <p>EEAST would welcome the opportunity to work with the Council and our other emergency partners on the scope of the design guide. The Council may be interested in reviewing the document created jointly across emergency services in Essex: Engaging with the Emergency Services   Essex Design Guide.</p>	Officers have viewed the information referred to and note that many of the principles referred to are consistent with those in the draft Bedford Borough Design

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			Guide. We welcome further comment during the consultation on the draft document.
Bedfordshire Local Nature Partnership	General	At the moment it is not possible to provide more than general comment with regard to the Design Guide. However, the LNP welcomes the approach based on landscape character and local distinctiveness. The selected settlements do seem to be good representatives of each LCA.	Noted
Oakley Neighbourhood Planning Group		<p>The Design Guide for the Local Plan 2040 should incorporate the following items.</p> <p>Place making should reflect the local area and every urban area should have a Place Identifier for house types, historical buildings, churches, schools and retail/industrial areas. Open space with footpaths and cycle ways linked to community facilities and 20% net environment gains on sites close by should also be included. Green landscaping, play areas and biodiversity should be identified and local residents involved as in Neighbourhood Plans.</p> <p>All new dwellings should have solar panels or heat pumps and be fully insulated. Bin, cycle and water storage should be specified. A mix of house types using lifetime homes principles and including space for home working should be included. Space around dwellings would need to meet national minimum standards and hard standing would need to be of a permeable nature.</p> <p>Sustainable transport should be encouraged with new developments having access to frequent bus services, (every 15/20 minutes) and footpaths and cycle routes to retail areas, schools, community centres and churches. Parks and open spaces should include play areas for all age groups and there should be soft integration at the edges of sites adjacent to open countryside. Footpaths and cycle ways should link to footpaths/bridleways in the area.</p> <p>Sites of 10 or more dwellings should include 20% green open space including hedges. Net environmental gain of 20% should be incorporated into the Guide for all development. Species should be identified, and green corridors included. If appropriate the green corridors should be extended to access the countryside.</p> <p>Neighbourhood Plans have already identified what is special about their settlement and all new development should include place making either by the Borough Council or through a Neighbourhood Plan.</p>	<p>The purview of the design guide is to provide analysis and guidance for the character and design of prospective future development and support the development plan's design policies. It cannot include new development plan policy or technical requirements. It will support the design policies in the development plan.</p> <p>Many of these issues are more relevant to master planning and design coding which will take place when new development sites are brought forward in accordance with existing and emerging (when adopted) planning policies.</p>
Bletsoe Parish Council		The Parish Council supports the adoption of the Borough's design guide to help support the delivery of growth that is representative of the local distinctiveness of the Borough, and trust that will extend to the rural areas to acknowledge their local distinctiveness, which will be different to the urban area.	Noted. Analysis of rural areas has been undertaken as part of the preparation of the design guide
Ravensden Parish Council		The Parish Council notes there is a separate consultation on the scope of proposed Borough-wide design guidance for new developments which is to become a Supplementary Planning Document rather than being incorporated into the Local Plan 2040.	Noted. Analysis of rural area has been undertaken as part of the preparation of the

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		<p>2. The Parish Council is producing its own Design Codes and Guidance to be included in its Neighbourhood Plan and is concerned that the Borough Wide document may not adequately reflect local character and distinctiveness. We are also concerned it may contain guidelines which are not well tailored to local circumstances or needs. We ask the Borough Council to consult the Parish Council closely in the preparation of the Borough Wide Guidance.</p>	<p>design guide. It is not intended that the BBC design guide will 'overwrite' any neighbourhood plan policies, rather to raise the profile of and support the application of design policies. Parish councils will be consulted on the draft document.</p>
Sharnbrook Parish Council		<p>SPC welcomes the production of a revised Design Guide for the area, and hopes that this will be taken into account for all applications going forward once agreed. It is especially pleasing that the Borough Council notes the need for rural and urban developments to be differentiated and that the needs are quite different. In particular, the use of trees in large developments is to be applauded, but should be applied to all developments over, say, 5 dwellings. Every effort must be taken to retain trees, or to replant where this is not possible, as well as adding more trees to developments to help with carbon capture. Planning applications should be planned around existing trees, rather than removing "inconvenient" trees and replanting. Wherever possible.</p>	<p>Noted. The design guide SPD will be a material consideration and carry weight in planning decisions</p> <p>The council is preparing a separate SPD that will provide advice on trees. The design guide SPD will contain principles relating to green infrastructure and green space where it is appropriate</p>
BPHA		<p>The principle of the preparation of a design guide is supported. It is important that the Design Guide drives local distinctiveness but also facilitates the redevelopment of uses within built up areas that are no longer fit for purpose.</p> <p>An example is the re-development of redundant garage blocks, the guide should facilitate the development of these areas to improve the quality of the built environment. The Design Guide should outline that it will act flexibly and work alongside landowners to find design solutions to accommodate refuse, parking and highway requirements. Cumulatively such small sites contribute significantly towards housing numbers. Areas where we are looking for flexibility are on distances to collection points for refuse bins, parking requirement in relation to the loss of garages and access requirements.</p>	<p>The purview of the design guide is to provide analysis and guidance for the character and design of prospective future development and support the development plan's design policies. It will however not change currently adopted policies or standards e.g. parking standards.</p>

### Further Engagement

Following the scoping consultation, a draft of the design SPD was prepared. This was circulated amongst internal departments including Development Management, Planning Policy, Heritage and Planning Compliance and Transport Strategy for comment before being issued for public consultation.

April 2022

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