



Local Plan 2040

Have Your Say on the Future of Your Borough

Frequently Asked Questions

We will keep this page up to date as new questions come up.

If you have a question which is not covered below, you can **email your question** to planningpolicy@bedford.gov.uk – ideally put ‘consultation question’ as the title of your email. Additionally we have a dedicated phone line (01234 718300) where you can **leave an answer phone message containing your query**. We will monitor these and ensure the most appropriate officer calls you back within three working days. Please give a summary of your question and leave your name and contact number.

Why are you reviewing the Local Plan so soon after the Local Plan 2030 was adopted?

The Local Plan 2030 was adopted in January 2020 following an independent examination in public. National policy now requires that local plans are reviewed and if necessary updated every five years, but in Bedford’s case the examination resulted in the inclusion of a new policy in the Local Plan 2030 committing the Council to a more challenging review timetable. An updated or replacement plan must be submitted for examination by January 2023.

The first reason given for this by the examining Inspectors was that there is a need for the Council to have a plan that responds appropriately to longer term growth requirements, and in particular in relation to the Oxford to Cambridge Arc, as soon as possible. They agreed that because of the uncertainty about Arc-related development and infrastructure needs post 2030, the plan they had been asked to consider should not try to do that, but that the next plan should do so fairly quickly. The second reason related to the speed with which new development would be built in coming years and the progress being made by local communities with their own neighbourhood plans, which the Local Plan 2030 relies upon to identify housing sites. The Inspectors saw that an early review of the Local Plan 2030 offers the opportunity for the Council to intervene if necessary, in order to maintain house building rates.

What is this consultation about?

The Local Plan 2040 will be a partial update of existing policies. The Local Plan 2030 was adopted only last year and the vast majority of its policies are up to date and do not need to change. Remaining policies in the earlier Allocations and Designations Local Plan have been reviewed and, in the majority of cases, they remain fit for purpose and similarly do not need to change at this time. We asked for views about the scope of the plan during last year's consultation and the responses have helped us to focus on the following key policy areas:

- Development Strategy to 2040 and delivery of growth in order to meet national policy requirements
- Town centre and retail policies in order to support a more flexible future for our centres
- Updated development management policies (those used to help make decisions on planning applications) to do with
 - Self-build and custom homebuilding
 - Quality of development and residential space standards
 - Environmental net gain

More detail is provided in the [Local Plan 2040 Draft Plan: Strategy options and draft policies document](#). The reasons why new policies for other subjects are not proposed are explained in Section 8 of the paper.

Following on from last year's consultation we have considered comments about the different locations for growth and have developed combinations that could deliver new jobs and homes. A long list of options is given in the [Development Strategy Topic Paper](#). The paper outlines the Council's emerging preferred options (in Section 3) but your comments are now invited on all options before a choice is made, and we ask you to tell us of others that you think should be considered.

Before deciding on a strategy and selecting land for development we are also inviting comments on the call for sites submissions. The assessment work so far completed by the Council is available to help you.

In addition, we are publishing for comment the latest evidence base documents. These may be updated in the light of comments we receive and, along with other evidence including a plan wide viability appraisal, will be available again for you to comment on at the next stage (during 2022).

How much growth should there be?

Government guidance sets out a standard method for calculating future housing requirements, which the Council must follow. The figure for Bedford borough currently is 1,275 dwellings per year, giving a total of 25,500 dwellings for the 20 year period from 2020 to 2040. This is the current starting point for the local plan housing requirement. Existing commitments (planning permissions, allocations from current local plans and an allowance for

windfall, which together total 13,000 dwellings) mean that based on the standard method figure of 1,275 dwellings p.a. the new local plan will need to allocate land to provide a minimum of 12,500 new dwellings.

Taking account of planned population growth to 2040, the requirement for new employment land by that date is calculated to be 171 hectares (ha). Overall, the currently available supply of such land in the borough amounts to 48 ha leaving a requirement for 123 ha to be allocated in the local plan. Further detail on how this has been calculated is set out in the evidence base document [Bedford Employment Land Study, March 2021](#). The local plan must also plan for other growth requirements that may arise, for example additional shops and services, schools and transport infrastructure.

Where should development be located?

Based on the building blocks of the development locations previously consulted upon, we have undertaken further work to define in more detail a range of potential alternative spatial strategies for the plan and the [Development Strategy Topic Paper](#) explains how they have been derived. As a result of this work there are seven draft alternatives which vary in their focus, from concentrating growth in the urban area, to growth in villages and at new settlements in the A6 and A421 corridors. For some alternatives, more than one option is available.

Currently, based on work we have undertaken to date, the emerging preferred options are options 2a, 2b, 2c and 2d.

If you think that there are other strategies we should be considering, please let us know. These may be ones set out in the Development Strategy Topic Paper or completely different alternatives.

What does this mean for neighbourhood plans?

In some parts of the borough Parish Councils are preparing neighbourhood plans with the support of their local communities and in six parishes neighbourhood plans are now 'made'. When officially 'made' neighbourhood plans have the same status as the local plan but must not conflict with the borough-wide local plan's strategy. They can be used to allocate sites in the same way as the local plan and allow local residents to decide for themselves where development should take place.

Once 'made' all of the neighbourhood plans will have review mechanisms within them and in due course parish councils will decide if they want those plan reviews to allocate development beyond 2030, either in accordance with a Local Plan 2040 strategy or because there is local evidence of a need to do so.

Discussions with parish councils will continue during the preparation of the Local Plan 2040. If the favoured strategy involves additional development in and around villages where there is a genuine choice of site available, we will ask parish councils if they would like to select site(s) in a new or reviewed neighbourhood plan. We would not expect neighbourhood plans to make large strategic allocations in locations where there is not a choice of site (for example a new settlement), including those that in some cases cross parish boundaries. These will be allocated in the Local Plan 2040.

As has already been the case, communities may decide to make neighbourhood plans and allocate development sites even though the local plan strategy doesn't require growth to be located there. Should this continue to happen, it will add choice and flexibility on top of allocations made in the Local Plan 2040.

We will continue to encourage groups to prepare neighbourhood plans and to support and work with local councils in a joined-up way to make sure that local and neighbourhood plans work together to support planning at the local level.

What about the Oxford to Cambridge Arc and East West Rail?

Whilst there remain many uncertainties about planning for our borough area as a result of the emerging Oxford to Cambridge Arc Spatial Framework, the selection of a route for East West Rail following their recent consultation and indeed the timing of the introduction of a new national planning system following consultation by government on the 'Planning for the Future' White Paper¹, the progression of this local plan will enable the Council and local communities to maintain control over the selection of locations for growth.

Could the number of dwellings required to be allocated increase when the Oxford to Cambridge Arc plans are finalised?

Councils in the Arc may reach agreement on how growth is distributed across the area. This may result in the number of new dwellings to be allocated in any given authority being different to the number reached by applying the standard methodology. Discussions about an Arc Framework are ongoing.

¹ <https://www.gov.uk/government/consultations/planning-for-the-future>

The emerging preferred options are based along the A421 travel corridors, expecting commuting. With more working from home and online meetings do you envisage this new normal changing the need for people to travel to work?

Whilst we have seen a significant move to working from home during the Covid-19 pandemic, it is too early to know what the long-term effects will be. There is evidence that the amount of traffic on the roads is increasing significantly but some of this may also be as a result of people who would otherwise use public transport using their car as lock-down measures are relaxed. Also there has been a significant increase in the number of distribution vehicles on the road during the pandemic as on-line ordering has grown. The situation will need to be kept under review.

<https://www.gov.uk/government/statistics/transport-use-during-the-coronavirus-covid-19-pandemic>

What is Bedford doing about the climate emergency?

Bedford Borough Council has declared a climate change emergency and is reducing its own carbon emissions to become Carbon Neutral by 2030.

We already have planning policies in place which require new developments to have a positive impact on climate change through the use of design and layout which maximise solar gain, natural ventilation and cooling, the reduction of emissions and use of water and encouraging connections to district heating networks where possible. We know that climate change can be influenced positively when developments include measures to encourage the use of sustainable transport, walking and cycling.

The Government is currently considering an uplift to energy efficiency standards through a new 'Future Homes Standard'. Once this becomes clearer, the Council will consider if and how planning policies in the local plan need to change. The standard will be brought in through changes to building rather than planning Regulations. New legislation is expected in 2025 after which time all new homes in England will have to be built according to the standards. Extensions will also have to comply with new requirements.

I objected to the amount of growth in the local plan last time and it didn't make any difference; will it be any different this time?

Annual housing requirements are based on a government formula called the **standard method** which takes account of population projections and affordability to calculate housing need. The affordability ratio is updated annually which means that the current annual requirement (1,275 dwellings) is likely to change as we progress the plan. It could go up or down.

Whilst the Council has little control of the levels of housing growth, where the development goes is something that can be influenced by the Council's site selection process and overall strategy. The consultation responses will help the Council to decide where growth sites should be allocated so your suggestions and reasons for them are important

What about the added pressure on doctors' surgeries?

The Council is liaising with the relevant NHS England premises managers and Clinical Commissioning Groups, who are responsible for planning doctor's surgeries. Where there is a requirement for expansion or provision of new surgeries arising from proposed development this will be identified in the Infrastructure Plan which will be prepared to support the Local Plan, and where appropriate land can be reserved for them within allocation sites.

What about added pressure on schools and other infrastructure?

An important consideration for the plan is whether the proposed sites are able to deliver necessary infrastructure and services, such as schools, community facilities, roads and drainage. In relation to primary schools, unless the development is of a type that does not create a need for school places, we need to ensure that sufficient spaces are available in existing schools. If it isn't, in order to support growth, a new school or school extension may be needed. Proposed new primary schools could provide one form of entry (one class in every year group) but ideally would be a minimum of two forms of entry (two classes in every year group). Extensions to existing schools where possible should provide an additional whole form of entry. Based on recent analysis each additional 500 dwellings will generate the need for an additional form of school entry (i.e. 30 pupils in each year) and 1,000 dwellings will generate the need for two forms of school entry. The implication of this is that sites capable of providing around 500 or 1,000 homes are needed to justify the requirement of a new school. Sites must offer the provision of a school at an early stage of the development. In all cases the Council will require sites for new primary schools to be a minimum of two hectares in size, which will provide sufficient space to enable one form entry schools to expand to meet future needs.

There may also be a need for new secondary places to be provided alongside development. A new settlement is likely to require its own secondary school. The Council will discuss the need for other types of infrastructure with providers to ensure that appropriate provision is in place.

What about increased traffic?

The Council has assessed each site that has been proposed for development and considered the suitability of access arrangements and the conclusions are set out in the [Site assessment proformas](#) supporting document. Allocated sites will have to be capable of providing a safe access to the highway and this may mean that some improvements have to be made by the developer. The Council has also looked at the effect on the wider highway network to see where changes are required to accommodate the additional traffic generated by development. Detailed reports are published as [supporting documents](#).

Can a parish council submit a response through the online system?

Yes, any organisation or individual can submit a representation online. Using the online system will help to improve the efficiency of the plan-making process.

Will there be a review of the settlement hierarchy?

The settlement hierarchy that was produced as part of the evidence for Local Plan 2030 is being reviewed to check that it is still fit for purpose. Local councils have helped us with updating the information about services and facilities. The settlement hierarchy will be published at the pre-submission plan stage and be available for comment.

Do you envisage the recent announcement by Robert Jenrick Secretary of State for Housing, Communities and Local Government, that there will be a ‘presumption of approval’ will affect the local plan?

Government has consulted on a White Paper called Planning for the Future to gauge opinion on proposed changes to the planning system as a whole. There are many responses for government to consider before any decisions are made about how to move forward. Primary legislation will be needed too and a new Planning Bill was announced in the Queen’s Speech (May 2021). We need to know more about the timetable and about the proposed transitional arrangements before we can understand how our plan-making will be affected, if at all. Government has said that local authorities should not stop plan-making so our local plan review will continue.

As part of the local plan review is there any opportunity to update environmental policies, for example, to require all new homes to have higher levels of insulation and solar panels?

The Government is developing new house-building standards to be implemented through building regulations. Once the Future Homes Standard has been published we will be able to see if and how our existing policies need to change.

What other opportunities will there be for parish and town councils to get involved in the preparation of Local Plan 2040

Next year (2022) the Council will publish a fully drafted plan, so the choice of development strategy will have been made and development sites selected. Anyone with an interest will be able to make representations. It is often referred to as the 'Regulation 19 publication stage' or 'pre-submission stage' because it precedes the submission of the plan for independent examination in public.

The Council will consider the formal representations made before deciding whether or not to submit the plan. If the decision is to move on to submission, the plan and supporting evidence along with the Regulation 19 representations are sent to the Planning Inspectorate and the examination commences. There is no further opportunity to change the plan before submission.

A planning Inspector (or Inspectors) will be appointed to run the examination with the assistance of an independent programme officer. Those who have made representation at the Regulation 19 stage to change the plan will be invited to take part.

Once the examination is finished, the Inspector(s) will produce a report telling the Council if the plan has been found 'sound'; in other words that it has passed examination. Most often modifications are required to reflect the consideration of issues at the examination. These will have been published for consultation before the Inspector(s) final report is received.

If important issues are raised during the Regulation 19 consultation the Council may decide not to submit it, but to change the plan and re-consult on it before submitting it for examination. This is what happened with the Local Plan 2030.

When will the examination in public take place and can I take part?

The examination in public is scheduled to commence in early 2023 when the plan is formally submitted to the Planning Inspectorate. Those who have made representation at the Regulation 19 stage to change the plan will be invited to take part. The Inspector(s) can invite others but cannot summon a person to the hearings. The Planning Inspectorate has produced a procedure guide for Local Plan Examinations <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

There are so many supporting evidence base documents, what are they for?

Evidence base documents are produced on a range of relevant subjects to help decide what the local plan says. Some of the evidence base documents are required by national policy, e.g. the Sustainability Appraisal. The following evidence base documents support the 2021 consultation. The reason for the inclusion of each is given in the table. You can comment on these documents during the consultation at Table 1 in the consultation paper.

Evidence Base document title	Author /source	Description of document
Bedford Borough Natural Capital Assessment Report	Natural Capital Solutions	Explains the project to map natural capital assets for Bedford Borough as part of a wider Bedfordshire project. Commissioned through the Local Nature Partnership, the outputs of the project will inform the local plan site assessment process and, once selected, site master planning.
Bedford Borough Transport Model New Settlements and the A6	AECOM	A technical note explaining the modelling that has been undertaken to look at the impact of traffic arising from proposed new settlements at Twinwoods and Colworth on the highway network. Section 4 summarises the findings.
Bedford Borough Transport Model New Settlements and the Black Cat junction	AECOM	A transport assessment of Little Barford new settlement scheme alone and also in combination with the Dennybrook (west of Wyboston) new settlement scheme. Section 4 summarises findings.
Bedford Borough Transport Model New Settlement West of Wyboston	AECOM	A transport assessment of the Dennybrook new settlement scheme. Section 4 summarises the findings.
Bedford Borough Transport Model Local Plan Assessment Report	AECOM	A detailed assessment of four development scenarios to inform the plan making process. Grey – dispersed growth; Pink, Yellow and brown – rail based, A421 and urban; Red and Orange – new settlements; Brown – urban (including extensions to urban areas outside the borough at Rushden and St Neots). These align with the locations for growth in the 2020 Issues and Options consultation. Summary of key findings can be found at para 13.5.
Bedford Borough Transport Model Local Plan Assessment Summary Report	AECOM	A summary and analysis of the findings in the report above.

Development Strategy Topic Paper	BBC	Gives an explanation of the development strategy options that have been considered so far in the preparation of the Local Plan 2040. Explains why options 2a, 2b, 2c and 2d have emerged as the preferred options for inclusion in the 2021 consultation paper.
Bedford Employment Land Study – 2021 (Part 1)	BBC	Provides the justification for the inclusion of employment allocations in the Local Plan 2040. It updates the Bedford Employment Land Study 2015 prepared by GVA to support the Local Plan 2030. It includes supply and demand information relating to employment uses as well as quantitative and qualitative information about employment sites.
Bedford Employment Land Study – 2021 (Part 2)	BBC	Detailed site specific information to support Part 1 above.
Gypsy & Traveller Accommodation Assessment	ORS	Provides an assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Bedford Borough. No sites will be allocated in the local plan; sites for Gypsy, Traveller and Travelling Showpeople will be progressed through the development management process (sites will be identified and planning applications submitted).
Healthy Weight Environments Topic Paper	BBC	Explains the work undertaken to explore the relationship between the location of hot food take-aways and obesity. To date there is insufficient evidence to justify intervention through the planning system but the work is ongoing.
Issues & Options Consultation - summary and responses	BBC	Summarises responses to the 2020 Issues and Options consultation. All submissions are also published in full (with personal details redacted) https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/local-plan-review/
Landscape Character Assessment	LUC	A 2020 update of the Bedford Borough Landscape Character Assessment first prepared in 2007 with first update in 2014. Assists the assessment of sites.

Local Housing Needs Assessment (LHNA)	ORS	Assesses the future housing needs across Bedford Borough 2020-2040, based on the government's standard method. Contains Executive Summary at the start of the document.
Bedford Town Centre Study	NEXUS	Assesses retail and leisure development needs compliant with national policy and guidance. Looks at local and national trends, and at Bedford's position as a town centre in the sub-region.
Self-build Topic Paper	ORS	Gives an overview of government policy and guidance on self and custom build housing, of Bedford Borough Council's register of those interested in self and custom build and a view on future need for this type of housing. Supports the inclusion of a new self and custom build policy in the Local Plan 2040.
Town Centres and Shopping Policies Topic Paper	BBC	To support the development management policies in the draft plan for the town centres and retail development. Maps included to show the boundaries of centres to which planning policies apply, including the Bedford town centre and Kempston district centre boundaries.
Site Selection Methodology – update June 2021	BBC	Explains the methodology that the Council will use to assess and select sites for inclusion in the Local Plan 2040. This document will be helpful if you are looking at site assessments because it explains the notations used (++, +, 0, ?, x, xx).
Site Assessment Pro formas	BBC	List of potential development sites submitted for consideration. Pro formas include factual/technical information gathered to date. More information will be added as the plan progresses.
Small Sites Topic Paper	BBC	National planning policy requires the Council to deliver at least 10% of its plan requirement on smaller sites (sites of 1ha or less). The information in this Topic Paper shows that delivery of small sites in Bedford Borough has consistently met the requirement without an explicit policy or strategy approach to favour small sites.
Strategic Flood Risk Assessment (part 1)	JBA	A technical report to inform choices about site allocations and policies in the Local Plan 2040.

Strategic Flood Risk Assessment Appendices	JBA	Maps and other technical data associated with the SFRA Part 1 report above. Includes an interactive map showing flood information (works best in Internet Explorer – some layers don't load in Chrome).
(Draft) Sustainability Appraisal Report	BBC	An essential part of the evidence base. Considers sustainability issues associated with emerging plan. Sets out the sustainability appraisal framework and sustainability objectives. The draft sustainability appraisal informs consultation on the alternatives being considered for the local plan. The report will be finalised and submitted for examination with the local plan. The Site Selection Methodology (above) is based on the sustainability objectives.

How does the timetable for preparation of the Local Plan 2040 fit with the preparation of the Arc Spatial Framework?

The Arc Spatial framework is being prepared over roughly the same period as the Local Plan 2040. It was due to progress quicker so that it informed the local plan. The first consultation on the Arc Spatial Framework is due to commence during summer/autumn 2021. The two timetables are shown in the local plan consultation paper and reproduced below.

	Summer 2021	Autumn 2021 – Spring 2022	Summer 2022	Autumn 2022	January 2023	Throughout 2023	Winter 2023
Local Plan 2040	Consultation on draft development strategy options, draft policies and submitted sites	Consider responses and prepare plan for submission	Plan for submission consultation	Consider responses, prepare final plan and supporting documents	Submit plan to Planning Inspectorate	Examination in Public involving public hearing sessions. Consultation on main modifications	Publication of Inspector's report Adoption of plan
Arc Spatial Framework	Consultation - developing a vision for the future of the Arc	Spring 2022 - Consultation on options for turning the vision into policy	Consider responses	Consultation on draft spatial framework		Implement final Arc Spatial Framework	

How does the timetable for the building of the East West Rail link fit with the Local Plan 2040 proposals?

The most recent timetable for East West Rail is that a further, statutory, consultation is due to take place in 2022. This will be followed by a Development Consent Order submission in 2023. If this is successful, permission for the railway could follow in 2024. Construction would then commence with a view to trains starting to run to Cambridge by 2030.