

Bedford Development Framework

**SUSTAINABILITY APPRAISAL OF THE
ALLOCATIONS AND DESIGNATIONS
DEVELOPMENT PLAN DOCUMENT**

SCOPING REPORT

Bedford Borough Council

10 December 2007

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1 Introduction

- 1.1 The Planning and Compulsory Purchase Act required that a Local Development Framework replace the Bedford Borough Local Plan. The Bedford Development Framework (BDF) is a collection of documents containing policies and proposals to guide the future development of the Borough.
- 1.2 The Sustainability Appraisal of each document in the Bedford Development Framework will play an important part in demonstrating and ensuring that policies reflect sustainability objectives. The results of the sustainability appraisal will contribute to the reasoned justification of policies.
- 1.3 The Council has already produced the first two documents for the Bedford Development Framework, the Core Strategy and Rural Issues Plan and the Town Centre Area Action Plan. Both documents were subject to a sustainability appraisal.
- 1.4 The Council has now started work on the third document of the Bedford Development Framework, the Allocations and Designations Development Plan Document (DPD). The sustainability appraisal of this document will be conducted in line with the guidance 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' (ODPM, November 2005) and will meet the requirements of the Strategic Environmental Assessment (SEA) Directive.
- 1.5 This Scoping Report is the first stage in the sustainability appraisal of the Allocations and Designations DPD. This report has been prepared by the Borough Council and sets out the current environmental, social and economic issues in the Borough and notes the sustainability issues relevant to the Allocations and Designations DPD. The report also proposes the Sustainability Framework that will be used to assess the sustainability of the Allocations and Designations DPD.
- 1.6 The Sustainability Appraisal of the Allocations and Designations DPD will draw upon the information gathered for the Sustainability Appraisal of the Regional Spatial Strategy and also the Core Strategy and Rural Issues Plan and the Town Centre Area Action Plan where relevant.
- 1.7 This is a Scoping Report and has been published for consultation. Consultees include the environmental bodies (English Heritage, Natural England and the Environment Agency) and other community groups and social and economic bodies with particular interest in the Allocations and Designations DPD.
- 1.8 **The consultation period is the 10th December 2007 to 16th January 2008.** All comments on the Scoping Report should be sent to:
Susan Garbutt, Bedford Borough Council, Room A107,

Town Hall, St Paul's Square, Bedford, MK40 1SJ.
Or alternatively, e-mail to: bdf@bedford.gov.uk

2 Sustainable Development – A Definition

The concept of sustainable development

- 2.1 The concept of sustainable development has been widely used since the Earth Summit at Rio de Janeiro in 1992 and is commonly defined as *'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'* (Brundtland Report, 1987). It seeks to achieve a better quality of life for everyone, now and in the future, while protecting and where possible enhancing the environment. This requires an integrated approach to deliver social progress and economic growth and maintain the quality of our natural environment.

National level

- 2.2 In 2005 the Government produced their second sustainable development strategy 'UK Sustainable Development Strategy – Securing the Future'.

The strategy has five key principles:

1. Living within environmental limits
2. Ensuring a strong, healthy and just society
3. Achieving a sustainable economy
4. Promoting good governance
5. Using sound science responsibly.

These principles set an overarching approach to sustainable development in the UK.

Regional level

- 2.3 The Sustainable Communities Plan 'Sustainable Communities: Building the Future' was launched in 2003. The plan set out a long term programme of action for delivering sustainable communities. As part of the plan a specific document was published for the East of England region 'Sustainable Communities in the East of England'. The plan stated four strategic challenges for the region:

- Addressing problems of high and rapidly rising house prices and their impact on the recruitment and retention of staff, particularly close to London and around Cambridge but spreading deeper into the region
- Improving transport infrastructure – railways, roads, airports and ports to meet the needs of economic growth
- Ensuring that the benefits of economic growth are spread across the region, particularly to those urban and rural communities facing problems of deprivation and peripherality
- Addressing the development consequences of scarce water resources throughout the region and in increasing sea level for coastal and low lying areas.

- 2.4 The East of England Regional Assembly published their Integrated Regional Strategy, known as 'Sustainable Futures', in October 2005. The document was published to provide a clear statement of regional priorities and

overarching context for all regional strategies. The document sets out eight crucial regional issues:

1. Housing supply, growth and sustainability
2. Transport, travel and infrastructure
3. Building the knowledge economy
4. Skills and labour supply
5. Deprivation and access to services
6. Health and well-being
7. Rural issues (housing, jobs, services, landscape)
8. Resource issues (water, land, biodiversity)

The strategy is to be reviewed shortly and will use the five principles of the UK strategy (see 2.2 above) as a foundation.

Local level

2.5 At the local level, the Borough Council produced its Community Plan for 2004-2010 in January 2005, building on the work of the Local Agenda 21 Action Plan of 1997. The Community Plan has nine themes:

1. Promoting community safety
2. Providing housing and building communities
3. Improving the environment
4. Improving health
5. Strengthening the economy
6. Developing learning opportunities and skills
7. Creating better transport
8. Including everyone.

2.6 Overall, the sustainability strategies above have the following common themes:

- Environmental protection – biodiversity, landscape
- Healthy society
- Housing provision – high prices
- Transport infrastructure
- Strong economy
- Resources - Water resources, land
- Skills and labour supply
- Deprivation and access to services
- Community safety
- Including everyone

3 Plans, Policies, Strategies influencing the Allocations and Designations DPD

- 3.1 There are a number of different plans, policies, strategies and guidance which influence and are of relevance to the Allocations and Designations DPD. A review of these has been conducted which will inform the development of the Allocations and Designations DPD. The aim of reviewing these documents is to:
- Identify relevant objectives
 - Exploit synergies and common objectives between strategies/guidance
 - Identify any possible inconsistencies, constraints and challenges to set the context for the Sustainability Appraisal
 - Understand the influence of these documents on the Allocations and Designations DPD
- 3.2 Appendix 1 provides a comprehensive outline of the plans that will influence the Allocations and Designations DPD. The implications of the plans have been used to inform the key sustainability issues to be considered by the Allocations and Designations DPD (see below). The relevant plans and strategies covered in Appendix 1 are listed below. International, national, regional and local documents are considered; the same issues are often covered in increasing detail by documents at different geographical levels.

International

- 3.3 The following international plans/directives were identified by the Sustainability Appraisal of the East of England Plan (2004) as relevant in the region:

General

Report of the World Summit on Sustainable Development (WWSD),
Johannesburg – Commitments arising from the Johannesburg Summit
UN Millennium Declaration and Millennium Development Goals
Kyoto Protocol and the UN Framework Convention on Climate Change
Bern Convention on the Conservation of European Wildlife and Natural Habitats
(1979)
Ramsar Convention on wetlands of international importance especially as
waterfowl habitat (1971)
Bonn Convention on the Conservation of migratory species of wild animals
(1979)

Climate Change

Directive to promote electricity from renewable energy (2001/77/EC)
Directive for the promotion of bio-fuels for transport (2003/30/EC)

Water

Water Framework Directive (2000/60/EC)

Urban Waste Water Treatment Directive (91/271/EEC)
Water pollution caused by Nitrates from agricultural sources: Nitrates Directive (91/676/EEC)
Bathing Water Quality Directive (Council Directive 76/160/EEC)
Drinking Water Directive (98/83/EC)

Air

EU Air Quality Framework and Daughter Directives (96/62/EC) (1999/30/EC) (2000/69/EC) (2002/3/EC) (2004/107/EC)

Land use

EU Directive 2003/35/EC (amended version of Environmental Impact Assessment – EIA Directive 85/337/EEC)
Strategic Environmental Assessment Directive (2001/42/EC)

Biodiversity, flora and fauna

Directive 79/409/EEC on the Conservation of Wild Birds
Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora

Waste Management

Framework waste directive (Directive 75/442/EEC, as amended)
Directive 99/31/EC on the landfill of waste
Packaging and packaging waste directive (94/62/EC of 20 December 1994)

National

3.4 The following have been identified as being national plans and strategies relevant to the Allocations and Designations DPD.

General

PPS1: Delivering Sustainable Development (February 2005)
Securing the Future - UK Sustainable Development Strategy (March 2005)
PPS1 Draft Supplement: Planning and Climate Change (December 2006)
Planning for a Sustainable Future: White Paper (May 2007)

Air

Air Quality Strategy for England, Scotland, Wales and Northern Ireland (July 2007)

Waste

PPS10: Planning for Sustainable Waste Management (July 2005)
Waste Strategy for England (May 2007)

Rural issues

PPS7: Sustainable Development in Rural Areas (August 2004)
Rural Strategy 2004 (Defra)

Biodiversity, flora and fauna

PPS9: Biodiversity and Geological Conservation (August 2005)

Planning for Biodiversity and Geological Conservation: A Guide to Good Practice (March 2006)

Cultural heritage and landscape

PPG15: Planning and the Historic Environment (September 1994)

PPG16: Archaeology (November 1990)

Economic development

PPG4: Industrial Commercial Development and Small Firms (November 2002)

PPS6: Planning for Town Centres (March 2005)

PPG8: Telecommunications (August 2001)

Good Practice Guide on Planning for Tourism (May 2006)

Energy

PPS22: Renewable Energy (August 2004)

Housing

PPS3: Housing (November 2006)

Delivering Affordable Housing (DCLG, November 2006)

Planning for Gypsy and Traveller Caravan Sites, Circular 01/2006

Planning for Travelling Showpeople, Circular 04/2007

Population and human health

PPG17: Planning for open space, sport and recreation (July 2002)

PPS23: Planning and Pollution Control (2004)

PPG24: Planning and Noise (September 1994)

Social inclusiveness

Safer Places: The Planning System and Crime Prevention (ODPM/Home Office February 2004)

Transport

PPG13: Transport (March 2001)

Water and soil

PPS25: Development and Flood Risk (December 2006)

Regional

3.5 The following have been identified as being regional plans and strategies relevant to the Allocations and Designations DPD.

General

East of England Plan Proposed Changes (December 2006)

East of England Plan Proposed Changes and Further Proposed Changes (October 2007)

Draft RSS Sustainability Appraisal (November 2004)

Milton Keynes and South Midlands Sub-Regional Strategy (March 2005)

Sustainable Futures: Consultation Draft of the Revised Integrated Regional Strategy (EERA, September 2007)

Neighbouring Authorities

East Midlands RSS (March 2005) *Under review*
Draft Regional Plan East Midlands Parts 1 and 2 (March 2007)
Draft South East Plan (March 2006)
London Plan (February 2004 & Early Alterations December 2006)
London Plan Draft Further Alterations (September 2006)

Biodiversity, flora and fauna

Our Environment Our Future: Regional Environment Strategy (July 2003)
Sub-Regional Green Infrastructure Guide (April 2005)

Cultural heritage and landscape

A Better Life: Cultural Strategy for the East of England (September 2006)

Economic development

Draft Regional Economic Strategy 2008-31 (September 2007)

Housing

Regional Housing Strategy 2005-10 (May 2005)

Population and human health

Healthy Futures: Regional Health Strategy 2005-10 (December 2005)

Social inclusiveness

Regional Social Strategy 2nd Edition (November 2007)

Water

Water Resources for the Future, A Strategy for England and Wales,
(Environment Agency, March 2001)

Local

3.6 The following have been identified as being local plans and strategies relevant to the Allocations and Designations DPD.

General

Bedford Borough Local Plan (October 2002) (saved policies only)
Community Plan 2004-10 (January 2005)
Core Strategy and Rural Issues Plan 2001-21 (submission) (July 2006)
Core Strategy and Rural Issues Plan (proposed changes) (January 2007)
Core Strategy and Rural Issues Plan (proposed changes) (May 2007)
Core Strategy and Rural Issues Plan (examination change) (Nov 2007)
Core Strategy and Rural Issues Plan Sustainability Appraisal (July 2006)

Neighbouring Authorities LDF

Milton Keynes Core Strategy (Issues and Options) (December 2006)
Milton Keynes Waste DPD (Submission) (January 2007)
North Northamptonshire Joint Core Strategy – Wellingborough and East Northamptonshire (Submission) (February 2007)

Wellingborough Site Specific Proposals Development Plan (Issues and Options) (February 2006)
East Northamptonshire Three Town Plan: Rushden, Higham Ferrers, Irthlingborough (Preferred Options) (September 2006)
East Northamptonshire Raunds Area Plan (Preferred Options) (January 2007)
Huntingdonshire Core Strategy (Preferred Options) (Nov 2007)
Huntingdonshire Development Control Policies DPD (Issues and Options) (May 2007)
Mid Bedfordshire Core Strategy (Preferred Options) (September 2007)
Cambridgeshire County Minerals and Waste Plan (Preferred Options) (November 2006)
Northamptonshire County Core Strategy/Locations for minerals and waste development (Issues and Options) (February 2007)
Bedfordshire Minerals Core Strategy and Site Allocations (Preferred Options) (September 2007)

Air

Air Quality Management Area Orders (May-June 2005)
Air Quality Action Plan Proposals (August 2007)

Waste

Waste Strategy for Bedfordshire and Luton to 2020
Bedfordshire Waste Core Strategy (October 2007)
Bedfordshire Waste Site Allocations Plan (October 2007)

Biodiversity, flora and fauna

Bedfordshire and Luton Biodiversity Action Plan (2001)

Cultural heritage and landscape

Marston Vale Forest Plan (2000)

Economic development

Bedford Town Centre Area Action Plan (submission) (July 2006)
Bedford Town Centre Area Action Plan (proposed changes) (May 2007)
Bedford Town Centre Area Action Plan Sustainability Appraisal (July 2006)

Housing

Housing Strategy 2004-07 (March 2004)
Empty Homes Strategy 2007-10 (June 2007)

Social Inclusiveness

Crime, Drugs and Anti-Social Behaviour Strategy 2005-08
Social Inclusion/Anti-Poverty Strategy for Bedford Borough (August 2006)
Bedfordshire Police Local Strategic Plan 2005-08
Bedfordshire County Council Older Peoples Strategy 2007-2012

Transport

Local Transport Plan 2006/07-2010-11

Water

Consultation Question

1. Have the correct plans, programmes and strategies relevant to the Allocations and Designations DPD been identified? Should others be identified? If yes, please state what plan/programme/strategy that should also be considered relevant to the Allocations and Designations DPD and state your reasons.

4 The Baseline: Bedford Borough Sustainability Issues

- 4.1 To undertake the Sustainability Appraisal, it is important to have an understanding of the state of the Borough today. Collecting baseline data at the start of the production of the Allocations and Designations DPD in 2007 will identify what environmental, economic and social issues there are in the Borough that the authors of the Allocations and Designations DPD should be aware of. Identifying these issues can ensure that potential negative impacts of the DPD can be minimised and positive effects of the DPD can be maximised.
- 4.2 This section of the report identifies data that is relevant to the sustainability of the Borough, and also identifies where there are gaps in information that would be useful information to have for the Allocations and Designations DPD. This baseline data provided in this Scoping Report can be updated and added to throughout the Sustainability Appraisal process where necessary.
- 4.3 The Allocations and Designations DPD will consider the following topics and issues:
- Housing allocations
 - Employment allocations and designations
 - Exception sites for housing
 - Review of Settlement Policy Areas and consideration of the need for new ones
 - Review of the urban area boundary
 - Consideration of landscape designations
 - Definition of the centres in the retail hierarchy
 - Gypsies, Travellers and Travelling Showpeople sites
 - Designation of important views and open spaces
 - Other designations (community, education, health, recreation, cultural facilities)
 - Transport infrastructure
 - Proposals Map – flooding zone, historical and environmental designations
- As the above issues are to be considered for inclusion in the Allocations and Designations DPD, the Sustainability Appraisal baseline information in this report aims to provide some background information about the above topics and issues in the Borough.
- 4.4 To provide baseline information for the Allocations and Designation DPD, the Borough Council intends to undertake the following:
- Housing Market Assessment
 - Strategic Land Availability Assessment
 - Review of local housing needs in the rural area

- Review of retail centres
 - Strategic Flood Risk Assessment
- 4.5 For each indicator both the current situation and identifiable trends are reported in Appendix 2. This data is provided for both Bedford Borough and a 'comparator' area where possible, so that the local information is seen in context; this comparator is generally either the East of England region as a whole or Bedfordshire County, where regional data is unavailable. Where the necessary information is not available at present, the gaps to be filled through future data collection are identified. This data should be regularly updated during the production of the DPD.
- 4.6 The baseline information is summarised below. The discussion of each topic is followed by a list of key issues and challenges that need to be taken into account when preparing the Allocations and Designations DPD. In collecting the baseline information a key problem is data availability. This problem has several facets:
- It varies between topics.
 - Data tends to be better at 'higher' tiers of government: for instance, statistics at the national level are easier to find but are of questionable applicability in measuring trends in Bedford.
 - Availability of data, in particular data series over time, is again a limitation.
 - Inferences from regional and national trends can sometimes be made but the 'criticality' of the trend (above/below a dangerous threshold; improving/worsening) is still often impossible to assess at the borough level.

Introduction

- 4.7 Bedford borough is situated in the eastern region of England in the county of Bedfordshire. It covers an area of 184 square miles. The main settlement is the urban area of Bedford/Kempston, which had a population in 2001 of 98,424. The remaining area is predominantly rural with a number of villages. The population of the rural area in 2001 was 49,487. Bedford is linked by railway to London and the East Midlands, and also via the Marston Vale line to Bletchley, Milton Keynes.

Social

- 4.8 The most recent population estimate states that the population of the Borough in mid 2006 was 155,100 people (59,500 households). The population has been increasing each year since 1995/6. The population is forecast to increase by 2021 to 171,900 people, with large increases in both the post-retirement population and those over aged 75. Average household size in the Borough in 2001 was 2.44 persons; this is forecast to fall to 2.3 by 2021. In 2001, 65% of the population lived in the urban area of Bedford/Kempston, 2% less than in 1991.

- 4.9 The Borough as a whole ranks 167th in the Indices of Deprivation of 354 Local Authorities (1 being the most deprived). Data shows that income deprivation is increasing and employment deprivation is stable. There are specific pockets of deprivation in three urban wards; Kingsbrook, Cauldwell and Queens Park. These are the lowest in Bedfordshire, except for two wards in Luton (Biscot and Dallow).
- 4.10 In 2001 72% of residents lived in owner-occupied accommodation. At this time, the average house price was £116,415. Average prices have risen sharply and now stand at £204,212. Housing affordability has risen in the period 2001 to 2006 from a ratio of 4.6 times pay to 7.8 (ratio of lower quartile pay to lower quartile dwelling price). A borough-wide housing requirements study was undertaken in 2004, which showed a need for 224 affordable homes per year. Homelessness in the borough is decreasing and latest information from 2004/05 identifies 302 homeless people. The 2001 census recorded the number of unfit homes to be 1803 (263 owned by Registered Social Landlords and 1540 owner occupied or private rented). The majority of residents of the borough travel to work by car (almost 40%) but a higher than average proportion in the region travel on foot, by bike or by bus.
- 4.11 Almost 81% of people in the borough described their ethnic origin as white British. There are also a higher proportion of people of Asian/Asian British (Indian, Pakistani, and Bangladeshi) and Black/black British Caribbean origin compared to the regional average.
- 4.12 Crime levels in the borough are slightly lower than both the rest of the county and the country as a whole. Fear of crime can have an important influence on the quality of life of residents.
- 4.13 Life expectancy in the Borough is 77.7 for males and 81.2 for females. For males this is higher than the England average, but lower than the regional average. For females it is higher than the England average and lower than regional average. Information on long-term illness is positive and shows a lower rate in the borough than in the region or England as a whole. However, these figures are only collected every ten years, so short-term comparison is not possible.

Key issues and problems

- 4.14 The borough's population is increasing, and household size is decreasing. The provision of housing is an important issue affecting the borough. House prices in the borough are high, which is clearly making it difficult for people to afford accommodation. There is a shortage of affordable (rented / part owned) homes in the borough. The Allocations and Designations DPD needs to ensure that there are sufficient affordable homes for all sections of the community.
- 4.15 The borough as a whole is not particularly deprived, but the pockets of deprivation should be a focus for attention.

- 4.16 The borough is more ethnically mixed than other parts of the region; this should be taken into consideration when planning for new facilities.
- 4.17 The borough does not appear to have a serious crime problem (crime rates are lower than the county and national average) or any major problems with health at present (long term illness is less prevalent in the borough than in the region or England as a whole).

Environmental

- 4.18 Bedford's urban capacity study (2002) has confirmed that there is a limited supply of previously developed land in the borough. Most of this is located within the urban area and there are also significant areas at the former Elstow Storage Depot (now site of The Wixams new settlement allocation), the former Thurleigh airfield (now largely used for car storage and industrial purposes) and the former DERA wind tunnel site at Milton Ernest (used for industrial purposes). Limited supplies of previously developed land emphasise the importance of making efficient use of land. Currently over 60% of new housing development occurs on previously developed land, but this trend is not expected to continue.
- 4.19 The borough contains areas of high quality agricultural land (grades 1, 2 and 3a) that should be avoided for development. The borough has fewer grades 1 but more grades 2 than in the county overall. There are also areas of mineral resources, such as sand, gravel and clay that must be protected from being sterilised by inappropriate forms of development.
- 4.20 Information on the consumption of energy and water is not yet available for the borough. The plan can however include policies to promote and encourage the development of renewable energy projects. It can also seek to ensure that new buildings are designed to be energy efficient and that they include renewable energy generation features where appropriate.
- 4.21 Although the County Council is responsible for waste disposal, the Borough Council is responsible for waste collection. Both have responsibilities for reducing the amount of waste disposed of to landfill. This can be done by encouraging re-use and recycling, as well as other methods of disposal.
- 4.22 The borough is served by a number of bus routes connecting outlying villages with the town centre. There are also several long-distance bus routes which stop in Bedford town centre. The main rail service connects Bedford with London and the east Midlands. The railway station, situated on the edge of the town centre, also provides a branch line link to the villages in the Marston Vale and Bletchley. Strategic road links connect Bedford with the M1 motorway and the A1. Despite the reasonably good public transport service, traffic congestion is a feature of many of the roads into the town at peak times.

- 4.23 The Borough designated four Air Quality Management Areas in 2005. These are at Stewartby for raised levels of sulphur dioxide from the brickworks and in Bedford Town Centre and Great Barford for nitrogen dioxide associated with heavy traffic flows in these areas. Action Plans for all these areas have been completed.
- 4.24 The water quality of the River Great Ouse is monitored for chemistry, biology and nutrients (nitrate and phosphate). The latest data published is for 2004-06 and shows positive results. The lowest scores were for Elstow Brook (stretch from Stewartby Lake to the A421) where biology was only fairly good and the presence of nitrates was moderately low.
- 4.25 As the town of Bedford straddles the River Great Ouse, it is not surprising to find that 12,023 properties in the borough are within the 1:100 year floodplain. This is the highest in the sub-region by some margin. Parts of the borough, particularly near to the River Great Ouse and the Elstow Brook, have a significant chance of flooding each year (higher than 1 in 75) although in many areas the risks are moderate to low each year (between 1 in 75 and 1 in 200 or lower).
- 4.26 In terms of biodiversity, the main wildlife priority areas in the borough designated as either Site of Special Scientific Interest (SSSI) or Local Nature Reserves (LNR). There are eight SSSI and seven LNR in the borough. In addition to these statutory sites, the County Council has identified county wildlife sites which it hopes to designate as LNR and regionally important geological sites at Bromham Pit and Quest Pit. Together, these sites represent the key sites for nature conservation within the borough.
- 4.27 The historic cores of many settlements within the borough have been designated as conservation areas. This means that the special character and appearance of the areas are protected from harmful development. There are a total of 26 conservation areas in the borough. More than 1,200 buildings in the borough are listed as being of special architectural or historic interest. These are afforded additional protection to preserve them. The majority of listed buildings are in the rural area. In addition 71 sites have been designated as scheduled ancient monuments. These sites are spread throughout the Borough. There is one listed building on the Buildings at Risk Register; Cardington Air Shed number 1 (grade II*).

Key issues and problems

- 4.28 There is a limited supply of previously developed land in the Borough. As such, Greenfield development will be required to meet housing requirements. There is only a small proportion of high grade agricultural land remaining the borough and this should be protected from development where possible.

- 4.29 The use of renewable energy and reducing energy needs should be a priority, as should be the recycling and re-use of all types of waste where possible.
- 4.30 Traffic congestion in the town centre is a problem as present and should be managed in favour of non car modes. The use of alternative modes of transport to the private car should be facilitated and encouraged.
- 4.31 In certain areas, the risk of flooding is a concern and measures should be taken to minimize these risks. Development proposals will have to consider the implications of the level of flood risk. This could include the construction of additional flood defences and flood water storage and the use of porous materials in areas where hard surfacing is required, such as car parks and paving. The use of sustainable drainage systems (SUDS) in developments should be considered, provided suitable management and maintenance measures can be put in place, as they can also be of benefit for nature conservation.
- 4.32 Air quality is a problem in four specific areas, any development proposals in those areas should not worsen the problem.
- 4.33 The Borough has areas designated as SSSI, mainly located to the north-west of the urban area as well as Local Nature Reserves, mainly located close to the urban area boundary. Development proposals in these areas should pay particular attention to the protection and/or enhancement of these sites. Of particular importance is the water quality of the River Great Ouse and opportunities should be taken to enhance existing sites of importance as well as to mitigate any harm caused to nature conservation interests.
- 4.34 The borough is recognized for its built heritage and contains many designated conservation areas and listed buildings and other historic features. Development proposals should take account of the character and enhance these areas.

Economic

- 4.35 According to statistics for 2006/07 74,600 people currently work in the Borough, this is 77% of the working age population and is an increase from previous years. The Borough's business services sector grew considerably between 1999 and 2004 with growth of 12% compared with only 5% growth achieved across the UK for the same period. However, employment trends have only recently picked up. Between 1991 and 2001 employment growth grew by only 10% compared to a national average of 17%. This is thought to have been a result of industrial re-structuring. Traditional sectors such as manufacturing have declined but this has not been offset by gains in service sectors to the same degree as other locations.
- 4.36 The close proximity of Milton Keynes, with its better quality employment land and premises, has contributed to this longer term trend. In particular, the

concentration of economic activity in Milton Keynes, and to some extent Northampton, has served to limit speculative development in Bedford.

- 4.37 In 2001, almost 29% of people in employment in the Borough worked as managers or in professional occupations. Employees work in similar occupations as those in the region as a whole, with the exception of skilled trades where fewer people are employed and professional occupations which employ more people. More than 25% of workers are employed in public services including public administration, health, education and care with a similar percentage employed in the business service sector. Whilst the Borough has a strong specialisation in manufacturing/light engineering and associated research, this sector provides only 10% of the Borough's employment.
- 4.38 Sectors that have experienced growth in recent years include retail, health, education and care and smaller sectors such as vehicle sales & repair, utilities and other services. Sectors that have recently declined include manufacturing and distribution, public administration, agriculture and construction.
- 4.39 Major employers currently include Unilever (research); Unipath, Healthcare Logistics (medical/ pharmaceutical); Argos, Asda (distribution); Casella (environmental monitoring); and Charles Wells (brewing).
- 4.40 In the future, Bedford is well placed to take advantage of improvements to transport infrastructure and its position in the Oxford to Cambridge Arc. It is hoped that this will allow Bedford to attract as well as indigenously develop quality innovation and technology based industries.
- 4.41 Bedford's employment land supply is dominated by a small number of post war industrial estates and business parks. The largest two of these, the Viking/Elms Estate and the Woburn Road Estate, account for 31% of the Borough's businesses between them.
- 4.42 With the opening of the Bedford Southern bypass, the south and east of the town has become the focus for new employment development. Recent investment has included the development of a high tech business park at Priory Park, three large distribution warehouses at Marsh leys and a flagship recycling facility at Cambridge Road.
- 4.43 In addition, employment opportunities are also found in and on the edge of the town centre and along the railway corridor. Little industrial land is found around the town centre but there are a number of office developments in this zone. The quality is variable and there are some notable vacancies. The railway corridor, which stretches west and south of the town centre, is the focus for the Borough's older industrial premises.
- 4.44 In the future the A421 corridor is likely to be the most attractive location for new employment development, though provision for new office development is made in the Town Centre Area Action Plan at the railway station and in

the Kingsway Quarter. Reuse of existing brownfield sites is also likely to provide better quality employment premises.

- 4.45 Whilst Bedford provides the majority of employment floorspace in the Borough, rural employment sites form a small but important element of the employment portfolio. Statistics for VAT based enterprises show 2,510 in the urban area and 1,860 in the rural area. Both these figures have increased in the past two years. The success of the rural industrial and employment property market hinges upon the provision of small, high quality premises offering good access to the transport network. Rural employment offers rural communities the opportunity to work locally, reducing car journeys and helping to support or create sustainable communities.
- 4.46 Bedford's average unemployment rate is 2.5%. This is higher than the county average of 1.6% and slightly higher than the UK average of 2.3%. There are however unemployment and deprivation 'hot-spots' all of which are in the urban area; the wards with the highest unemployment are Queens Park, Kingsbrook, Castle, Cauldwell (all over 4%).
- 4.47 In the Borough 55.5% of pupils obtain 5 GCSEs or more at grades A*-C, whilst overall 98.6% of people have a pass grade. The overall pass level is higher than both the regional and national average.
- 4.48 Bedford town centre is the focus for shopping in the Borough. Vacancy rates in the town centre (ground floor units) remain steady at 5%. The primary shopping area is compact with a good range of comparison goods retailers. The town centre is the subject of an Area Action Plan which proposes various town centre re-development schemes. Local shopping needs are met at the district centre at Kempston, village centres and a variety of neighbourhood centres within the urban area. In addition there are various out-of-centre retail developments, located on the urban boundary, primarily selling bulky goods.

Key issues and problems

- 4.49 Over the years there has been a reduction of the local employment base particularly in the manufacturing sector and this has increased reliance on employment opportunities elsewhere. Alongside the expected increase in housing and also to prevent further out-commuting, it is important to ensure that there is also an appropriate increase in local employment opportunities.
- 4.50 Rural employment opportunities will continue to make a small but spatially important contribution towards the overall portfolio of sites. The challenge will be to identify quality sites that the market will deliver. The conversion and adaptation of rural buildings for employment use and farm diversification will continue to be encouraged by the Council but at a scale appropriate to their location.

4.51 Whilst overall unemployment remains low, the pockets of higher unemployment must be recognised and addressed. Matching the skills base with existing and new employment opportunities will continue to be a challenge.

4.52 The plan needs to consider how to ensure that local shopping facilities remain vibrant, attractive and accessible locations. Large areas of new residential development should include local shopping facilities to serve local needs, thereby reducing the need to travel.

Appropriate Assessment

4.53 An appropriate assessment should be carried out on the potential effects of a proposed plan on any European ecological sites. The Habitats Directive establishes a European ecological network known as Natura 2000. The network comprises special areas of conservation (SAC) designated by Member States in accordance with the provisions of the Directive, and special protection areas (SPA) classified pursuant to Directive 79/409/EEC on the conservation of wild birds (the 'Birds Directive'). There are 189 Natural habitat types of Community interest in Annex I of the Directive and 788 Animal and plant species of Community interest in Annex II. Annex IV lists animal and plant species in need of particularly strict protection.

4.54 There is no Natura 2000 sites present in the borough. As such the sustainability appraisal does not intend to include an appropriate assessment. This decision will be reviewed throughout the sustainability appraisal process if screening determines that the plan, in combination with other plans and programmes, is likely to have an adverse effect on a European site.

Consultation Questions

2. Are there any other sustainability issues or problems that have not been identified? Please provide details of the issue and data to support your statement.

3. Are there any further studies other than those identified in paragraph 4.4 that should be undertaken for the Allocations and Designations DPD? If yes, please state what study should be undertaken and why it is necessary for the Allocations and Designations DPD.

5 Sustainability Objectives

- 5.1 One of the aims of the Bedford Development Framework is to improve the sustainability of the borough and undertaking a sustainability appraisal is a means of helping achieve this. In order to help to assess the sustainability of the policies and to monitor their success in sustainability terms, it is helpful to identify sustainability objectives and indicators.
- 5.2 A set of sustainability objectives has therefore been produced which aims to improve the sustainability of the Borough. These have been based on the relevant sustainability strategies identified in section 2, the objectives of the relevant plans and strategies identified in section 3 and the key issues and problems identified in section 4 from the review of baseline information. The process that was undertaken in developing the objectives is shown in Appendix 3.
- 5.3 The proposed sustainability objectives are as follows –
1. Reduce greenhouse gas emissions
 2. Adapt to impacts of climate change, including flood risk
 3. Protect and enhance the natural and historic features of the Borough
 4. Create, conserve and enhance distinctive local environments, habitats and species
 5. Promote sustainable lifestyles, use resources efficiently, maximise recycling and re-use
 6. Reduce levels of deprivation and exclusion, particularly the elderly and those from disadvantaged backgrounds
 7. Provide a range of quality homes for all, especially affordable housing
 8. Achieve healthy lifestyles and provide facilities to enable this
 9. Provide social infrastructure for all ages and accessible services and facilities
 10. Meet the needs of a changing population
 11. Promote community involvement in place shaping by all groups in society
 12. Deliver low carbon buildings, whatever their use
 13. Support the borough's economy and specifically encourage the high value knowledge based industries
 14. Improve the skills of the labour force
 15. Minimise transport growth
- 5.4 In addition to the proposed objectives stated above, a set of indicators have been chosen which will enable the effect on sustainability to be measured. A limited number of indicators have been devised for each objective; where possible these draw upon national sources, to allow comparisons between local data and the wider picture.
- 5.5 By highlighting key aspects of environmental, social or economic performance, indicators can help with:
- assembling the evidence base for the appraisal process

- identifying important issues and problems that should be addressed in future Local Development Documents
- monitoring the effects of policies and proposals once they are implemented.

The list of indicators will be refined through consideration of their soundness, data availability and views of key stakeholders and the outcome of this process will be reported in the final sustainability appraisal document. Some of the indicators may be useful for more than one objective; however they are only given once to avoid duplication of information.

5.6 By definition, indicators are selective in the information they provide. While those chosen are reflective of the various appraisal objectives, it is inevitable that they capture only some dimensions of the area's environmental, social and economic conditions. In particular, an indicators-based approach is not the best means of reporting qualitative information or spatial variations at the local level. For this reason the baseline assessment supplements the indicators with a broader discussion of the area's characteristics, providing a more rounded basis for identifying key issues and problems.

5.7 The proposed sustainability objectives and related indicators are set out in Appendix 4; together they are the Sustainability Appraisal Framework. The framework covers all the issues and problems that were identified from the baseline information.

Consultation Question

4. Do you agree with the sustainability objectives and indicators that have been identified in Appendix 4? If no, please state alternatives and give your reasons.

6 The Identification of Different Options

6.1 There is not necessarily one single way of meeting the needs of people in the Borough. Some of the different options may be more sustainable than others and, in order to ensure that the Bedford Development Framework contributes to sustainable development as far as possible, different options for the Allocations and Designations DPD need to be assessed.

6.2 There is more than one kind of option that can be considered in relation to the Allocations and Designations DPD. These are as follows:-

- *Discrete Options*: These are alternatives that involve a choice between options. For example, should development be located on one site or another.
- *Alternative Approaches*: These are different ways in which an issue can be approached. For example, the need to reduce car journeys could be addressed by locating more housing in areas with good public transport accessibility, by helping to fund improvements to public transport, or a combination of the two.
- *Do nothing*: In some instances it may be that it could be more sustainable to leave things as they are, and this option may need to be considered on some occasions.

6.3 The range of options available in the Allocations and Designations DPD is guided by the Core Strategy and Rural Issues Plan (examined in 2007) and regional policy in the East of England Plan and Milton Keynes and South Midlands Strategy (see section 3). These plans have already been subject to Sustainability Appraisal.

7 Where Next? The Sustainability Appraisal Report

- 7.1 This document has set out the results of the preliminary stages of the sustainability appraisal of the Allocations and Designations DPD of the Bedford Development Framework. Baseline information has been identified together with sustainability issues that the Borough is facing and specific sustainability objectives.
- 7.2 The results from the consultation on this Scoping Report will be taken into account as the sustainability appraisal process continues. The emerging options for the Allocations and Designations DPD will be appraised as the document is produced (see the diagram below). The highlighted section shows the current stage in the sustainability appraisal process.

| Date | DPD production process | Sustainability Appraisal process |
|---------------------|---|---|
| Sept 2007 | Evidence gathering | Evidence gathering |
| Dec 2007 | | Scoping Report setting out the scope and level of detail of the proposed Sustainability Appraisal published for 5 weeks consultation |
| Jan 2008 – Feb 2009 | Prepare issues and options in consultation | Appraisal of the options and their significant effects |
| Mar 2009 – Jul 2009 | Prepare the Preferred Option DPD | Prepare the Sustainability Appraisal Report |
| Aug 2009 | Preferred Options DPD published for 6 weeks consultation | Sustainability Appraisal Report of the DPD published for 6 weeks consultation |
| Oct 2009 – Mar 2010 | Consider comments on the DPD and amend as necessary and Prepare the Submission DPD | Consider comments on the SA Report and appraise any changes to the DPD |
| Apr 2010 | Submission of the DPD to the Secretary of State and published for consultation for 6 weeks | Submission of the Sustainability Appraisal Report to the Secretary of State and published for consultation for 6 weeks |
| Jun 2010 | Publication of representations proposing alternative site allocations or a change to an allocated site boundary | It is the responsibility of the person proposing an alternative site or boundary change to indicate how the sustainability process has been or is to be carried out prior to consideration of the proposal at the |

| Date | DPD production process | Sustainability Appraisal process |
|----------|--|--|
| | | examination |
| Aug 2010 | Comments received on the DPD are sent to the Planning Inspectorate | Comments received on the Sustainability Appraisal Report are sent to the Planning Inspectorate |
| Sep 2010 | Pre-Examination Meeting | |
| Nov 2010 | Examination | |
| Apr 2011 | Inspector's Report | |
| Apr 2011 | Adoption and publication of the DPD and monitoring | Publication of the Sustainability Appraisal Report and monitoring of the possible significant effects of the DPD highlighted in the report |

- 7.3 At this scoping stage, it is anticipated that emerging options for the DPD will each be assessed against each of the sustainability objectives. For each option the likely effect on the existing baseline will need to be determined. An assessment will be made as to whether any change will occur and if so whether the effect will be a positive, negative or neutral effect. This assessment will need to be made in the short (next 5 years), medium (next 10 years) and longer term (10 or more years). The likelihood of the effect occurring, the geographical scale and whether the effect will be permanent or temporary will also be noted. The assumptions made in making the judgement should also be noted. The Report should include any recommendations for the mitigation of negative effects and improvement of the sustainability of the options.
- 7.4 The assessment of the effects of the Plan on sustainability issues will require the input of those who have been involved in producing the Allocations and Designations DPD. The final assessment of the effects of the policies and proposals contained in the DPD on sustainability will however be undertaken so that it is independent from those who have been involved with policy formulation.
- 7.5 The results from the appraisal process will be used to help determine which policies and proposals are the most sustainable and should be chosen as the Preferred Options for the DPD. The results from the appraisal will also enable the wording of the policies and detail of the proposals to be altered so that they are as sustainable as possible.
- 7.6 The results from the sustainability appraisal process will be set out in a sustainability appraisal report that will be published at the same time as the Preferred Options DPD. This report will also set out how the likely significant effects that were identified as part of the appraisal process have been addressed. For example in terms of the options that were incorporated

into the plan and proposed mitigation measures. This report will be available for comment as part of the consultation process on the Preferred Options DPD.

- 7.7 Once amended following the Preferred Options consultation process, the Sustainability Appraisal Report will be published for consultation alongside the Submission DPD and be assessed at the examination. Once the DPD is adopted, both the DPD and its likely significant effects identified in the Sustainability Appraisal Report will be monitored in the Annual Monitoring Report published each December.
- 7.8 The Sustainability Appraisal Report published at submission stage will be structured as follows:

Summary and Outcomes – non-technical summary, likely significant effects of the DPD, how the SA process has affected the DPD, how to comment

Appraisal Methodology – approach adopted to the SA, when the SA was conducted, who carried out the SA, who was consulted (when and how), difficulties encountered

Background – Purpose of SA and the Report, DPD objectives and outline of contents, compliance with the SEA Directive

SA objectives, baseline and context – Relevant plans, policies and SA objectives, baseline information, main issues and problems identified, limitations of the information and assumptions made, the SA Framework

Plan issues and options – main strategic options considered and how they were identified, comparison of the effects of the options, how social, environmental and economic issues were considered in choosing the preferred options, other options and why they were rejected, proposed mitigation measures

Plan policies – significant effects of the preferred policies, how social, economic and environmental effects were considered in developing policies and proposals, proposed mitigation measures, uncertainties and risks

Implementation – links to other tiers of plans and programmes, proposals for monitoring

Consultation Question

5. Do you agree with the proposed structure of the Sustainability Appraisal Report? If no, how should the structure be changed?