



Report to Bedford Borough Council

by Roland Punshon BSc, MRTPI

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

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

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO THE BEDFORD BOROUGH COUNCIL CORE STRATEGY AND RURAL ISSUES PLAN

DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 3 July 2006

Examination hearings held on 11, 12, 13, 18, 19, 20, 26 and 27 September
and 11 October 2007, and 17 January 2008

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1 Introduction and Overall Conclusion

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
 - (a) whether the DPD satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to its preparation; and,
 - (b) whether the DPD is sound.
- 1.2 This report contains my assessment of the Bedford Borough Council Core Strategy and Rural Issues Plan (CSRIP) DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.
- 1.3 My role is to consider the soundness of the submitted CSRIP DPD against each of the tests of soundness set out in Planning Policy Statement (PPS)12: Local Development Frameworks. In line with national policy, the DPD is presumed to be sound unless it is shown to be otherwise by evidence considered during the examination. The changes I have specified in this binding report are made only where there is a clear need to amend the document in the light of the tests of soundness in PPS12. None of these changes should materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.
- 1.4 My report firstly considers the procedural tests, and then deals with the relevant matters and issues considered during the examination in terms of the tests of conformity, coherence, consistency and effectiveness. **My overall conclusion is that the CSRIP is sound, provided it is changed in the ways specified in Annexe A.** The principal changes which are required are, in summary:
 - a) Changes to explain the background to the DPD to enable plan users to understand the basis for the plan provisions.*
 - b) Changes to explain the inter-relationship between various parts of the DPD and the ways in which the document's provisions would operate.*
 - c) Changes necessary to bring the DPD into line with national guidance on rural areas, gypsy and traveller issues and climate change.*
 - d) Changes to enable the plan provisions to be effectively monitored and implemented.*
- 1.5 The changes which I recommend are set out in Annexes A-E to this Report. Prior to the commencement of the Hearings Sessions, the Council proposed 2 sets of changes to the CSRIP. These are numbered PEC1-7 and PEC8-24. The Council undertook consultation on these changes and carried out a re-assessment of the Sustainability Appraisal in-line with the guidance in PPS12. In addition the Council proposed a further change (EC1) which was

advertised and re-assessed in the same way. These changes are set out in Annexe A to this Report.

- 1.6 During the Hearings Sessions the Council suggested a number of other changes and I have numbered them PC25-79. Additionally some changes were suggested by the Council in various hearings documents and I have recommended some changes of my own. These I have numbered IC1-20. The PC and IC changes have not been advertised or re-assessed through the sustainability appraisal process. However, I am satisfied that they are largely explanatory, up-dating or designed to bring the document more fully into line with national guidance and the Regional Spatial Strategy (RSS) and that advertisement and re-assessment is unnecessary. The information which they contain and the policy direction they provide is drawn from the existing evidence base and national guidance. They are also set out in Annexe A, in plan order.
- 1.7 Recommended changes to Figure 2 (PEC8 and PC36) and to the Key Diagram (PC74) are set out in Annexes C and D respectively. Recommended changes to Tables 1 and 2 of the monitoring and implementation framework contained in Appendix F of the CSRIP (PEC21-24, PC77-79 and IC20) are set out in Annexe E.
- 1.8 All of the changes which I recommend in Annexes A, C, D and E are necessary to make the CSRIP sound. Without them, I consider that the document, as a whole, should be found to be unsound on the grounds that it lacks coherence and consistency and that there is unjustified divergence from national policy. Some of the changes which I recommend in Annexe A are relatively minor in themselves. However, in cumulative terms, their effect would be to make the CSRIP less confusing and more easily understood. In these circumstances, I consider that all of the changes in Annexe A are necessary to make the document sound.
- 1.9 The changes set out in Annexe B are very minor and clarify, correct and update various parts of the text. Whilst helpful to an understanding of the document, they do not affect its overall soundness. I have numbered them CC1-7.
- 1.10 As required, I have considered the CSRIP on the basis of the version submitted to the Secretary of State in July 2006. Significant amendment of the document should not have been necessary after that stage. It should not have been necessary for me to recommend so many changes to the document in order to make it sound. It is disappointing that I have had to do so, especially as a great proportion of the changes emanate from poor structure, inadequate explanation and divergence from national guidance. I am satisfied that the Council's officers fully understand the meaning and direction of the submitted document. However, I find it difficult to escape the conclusion that the document had not been prepared with the end user in mind.

- 1.11 I have employed the policy and paragraph numbering of the submitted document in this Report. I have not sought to insert new paragraph numbers or to address any consequential policy or paragraph re-numbering issues. The Council will need to do that and will need to ensure that any paragraph or policy references in the text are corrected accordingly.

2 Procedural Tests

Test 1 - Consistency with Local Development Scheme

- 2.1 The CSRIP is identified in the Council's Local Development Scheme (LDS) adopted in 2005. In accordance with that LDS entry, the CSRIP sets out the spatial vision, spatial objectives and strategy for the area. It provides part of a framework for the control of development although the Council intends to produce a Development Control Policies DPD (DCPDPD) which will take this forward and provide more detailed direction. In the meantime development control decisions will be made on the basis of saved policies from the Bedford Borough Local Plan adopted in 2002 (the Local Plan). The timetable for production of the CSRIP set out in the 2005 LDS has 'slipped'. However, formal adoption of the CSRIP should closely follow the projected date of adoption (December 2007).
- 2.2 A revised LDS was approved by the Council in August 2007 and was brought into effect in September 2007. The entry for the CSRIP has been brought up to date to reflect the timetable changes. New entries in the LDS include an Allocations and Designations DPD (ADDPD) to be adopted by 2011, a DCPDPD to be adopted by 2013 and a Climate Change Supplementary Planning Document (CCSPD) to be adopted in 2008. The production of each of these documents has a bearing on the provisions of the CSRIP and, where necessary, I will refer to them in my Report. A proposed change to paragraph 1.8 brings information on the progress of the LDS up-to-date (PC27).
- 2.3 I am satisfied that, as the preparation of the DPD has been generally in accordance with the LDS, Test 1 has been met.

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

- 2.4 The Council's SCI was adopted in May 2006 by which time consultation on Preferred Options had already taken place. However, the Council has confirmed that, prior to adoption of the SCI, it complied with the guidance contained in PPS12 which advises that, in these circumstances, the Council must satisfy the minimum requirements set out in the Regulations. I have noted that adjoining local councils were not consulted at Regulation 25 stage but that this omission was rectified in subsequent stages. I agree with the conclusions reached in the Inspector's Report on the SCI that the interests of these parties were not prejudiced by the omission. From the submission stage, consultations took place in accordance with

the SCI. It is clear from the Statement of Consultation [CD6.1.6] that a wide range of bodies were consulted. A variety of methods were employed to engage communities and stakeholders in the process and issues and aspirations brought forward through the process have been taken into account. In my opinion, the Core Strategy would provide a rational basis for decision making and its preparation process should build commitment to its delivery.

- 2.5 After submission of the CSRIP, the Council proposed changes on a number of occasions – the PEC, EC and PC changes. In respect of the more substantial changes, consultations were undertaken in line with the guidance set out in the box following paragraph 4.18 of PPS12. The changes were subject to the same process of publicity and the opportunity to make representations as the submitted CSRIP. As I have already made clear, other changes are proposed which are largely explanatory, up-dating or designed to bring the document more fully into line with national guidance and the RSS. In their cases I consider that advertisement and re-assessment of the sustainability appraisal was unnecessary. No evidence has been put before me to indicate that the Council's consultation procedures in respect of the CSRIP or the PEC, EC and PC amendments were in any way deficient.
- 2.6 I am satisfied that the DPD was prepared in compliance with the SCI and in compliance with the minimum requirements set out in the 2004 Regulations. Tests 2A and 2B have therefore been met.

Test 3 - Sustainability Appraisal

- 2.7 In accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (the EAPP Regulations) the Council consulted English Nature, the Environment Agency, English Heritage and the Countryside Agency on the scope and appropriate level of detail of information which should be included in the Sustainability Appraisal Report. Information on this scoping exercise was published alongside the Policy Options paper.
- 2.8 The sustainability appraisal was carried out by a team of 3, including Council officers, with other 'observers'. The CSRIP Objectives were assessed for compatibility against the Sustainability Objectives and these were employed to test the CSRIP policies through the various sustainability appraisal processes.
- 2.9 A sustainability appraisal report was published alongside the Preferred Options version of the CSRIP and was consulted upon. A revised sustainability appraisal report was published alongside the submission version of the CSRIP.
- 2.10 The Council has confirmed that the sustainability appraisal report meets all of the requirements for sustainability appraisal and strategic environmental assessment set out in the relevant

regulations and guidance and it is not aware of any shortcomings in its preparation.

- 2.11 The Council re-appraised the sustainability of the CSRIP in the light of the PEC, EC and PC changes. Decisions on the implications of the changes on sustainability were made at officer level in the Council. However, I have seen no evidence to suggest that the re-appraisal of the sustainability appraisal report was not properly undertaken or that a more rigorous re-appraisal would have produced any different conclusions.
- 2.12 Natural England has confirmed that it agrees with the Council's conclusion that the policies of the CSRIP are unlikely to have a 'Likely Significant Effect' upon the European sites identified and that the further stages of Appropriate Assessment under the Habitats Regulations are not required.

2.13 In these circumstances I consider that Test 3 has been met.

Tests 4A – Spatial Plan

- 2.14 The key principles of spatial planning are set out in paragraphs 30-32 of Planning Policy Statement (PPS)1: Delivering Sustainable Development, paragraphs 1.8-1.11 of PPS12 and the companion guide to PPS12 – Creating Local Development Frameworks.
- 2.15 In paragraphs 3.7-8 the CSRIP sets out a clear spatial vision for the borough as a whole and for its constituent parts - the Town Centre, the Growth Area and the Rural Policy Area (see paragraph 3.16 below). The vision is distinctive in that it clearly relates to the particular circumstances of the borough.
- 2.16 The CSRIP identifies 16 objectives which will be employed to deliver the vision. In my view the terminology used in some of the CSRIP Objectives is unclear or repetitive. Amendments suggested during the course of the Examination would add clarity (PC29-32). I deal with these changes elsewhere in this Report and have recommended that they should be made.
- 2.17 PPS1 states that spatial planning goes beyond traditional land use planning. In my opinion, the CSRIP Objectives appear to be largely development and land use orientated. However, it could be argued that, to some extent, this is inevitable given the growth agenda passed down to the Council from the national/regional level. In these circumstances, and in the light of the evidence before me, I am satisfied that the CSRIP seeks to go beyond a narrow land use focus and to deal with wider issues appropriate to a spatial plan.
- 2.18 Consultations have been carried out in line with the Council's recently approved SCI. I have already concluded that the Council has satisfied Test 2.

- 2.19 Paragraphs 4.33-34 of the CSRIP set out the relationship of the CSRIP to the Regional Economic Strategy and to the Bedfordshire and Luton Joint Economic Development Strategy. At the Hearing sessions the Council argued that the CSRIP reflects the Regional Environment Strategy. These linkages are not made clear in the body of the CSRIP but I am satisfied that the documents were taken into account. Paragraphs 4.99-101 and Policies CP28, CP29 and CP30 clearly indicate that the Council took full account of the Local Transport Plan (LTP) in preparing the CSRIP. The submission version of the CSRIP gives no clear indication of how the provision of infrastructure is related to development proposals. I deal with this in more detail in paragraphs 3.110-114 below. A change to Table 1 of Appendix F is proposed which brings information on the delivery of LTP schemes up-to-date (PC77). In the interests of clarity and to demonstrate that infrastructure provision is being properly linked to development proposals, I have recommended that that change be made.
- 2.20 None of the major service providers have raised general objections to the CSRIP in response to consultation. It can be assumed, therefore, that the provisions of the CSRIP are in-line with their own programmes.
- 2.21 The Council consulted neighbouring local authorities during the plan preparation process. I am satisfied that adequate opportunity has been provided to these authorities to identify any cross-border conflicts arising from the CSRIP. During the Hearing sessions my attention was drawn to a number of cross-border projects and working arrangements in which the Council is involved. In my view it is unnecessary for the CSRIP to refer to these by name. I deal with the consistency of the Core Strategy with national planning policy and its general conformity with the RSS elsewhere in this Report. However, I am generally satisfied that the Core Strategy embodies an integrated approach to other strategies and policies.
- 2.22 The CSRIP provides a framework which, with proper monitoring, will allow responses to be made to changing circumstances at local, regional and national levels. However, I have concerns that the detailed provisions of the CSRIP may not be sufficient to permit a fully flexible response to such change. For the purposes of this test, I am satisfied that the CSRIP seeks to be responsive. However, I will return to this point elsewhere in my Report.
- 2.23 Policy CP32 and Appendix F of the CSRIP set out an implementation and monitoring framework. I deal with this matter in greater detail below. However, for the purposes of this test, I am satisfied that deliverability of the CSRIP has been addressed.
- 2.24 I conclude, therefore, that the Core Strategy seeks to embody the six principles which define spatial planning as set out in the companion guide to PPS12. It attempts to be visionary, wide-ranging, participative, integrating, responsive and deliverable. In my

opinion, the Core Strategy is generally in-line with the descriptions of spatial planning contained in PPS1 and PPS12. No evidence has been put before me which demonstrates that the Core Strategy is unsound in this regard. In these circumstances, I am satisfied that it is a spatial plan and that, with the changes proposed, it is **sound** so far as Test 4a is concerned.

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

PC29, 30, 31, 32 and 77

Test 5 – Community Plan

2.26 It was explained at the Hearings sessions that the CSRIP Objectives are derived from the Key Themes of 'A Community Plan for the Borough of Bedford 2004-2010' (the Community Plan) which have been worked up into a series of Spatial Issues by way of an officer working group and a 'sounding panel' of elected members. Appendix D to the CSRIP sets out the relationship between the Key Themes of the Community Plan and the Spatial Issues of the CSRIP. However, it was only in the light of the additional evidence contained in CD10.1.19, which was handed into the Examination, that the relationship between Spatial Issues, the CSRIP Objectives, the CSRIP policies and others DPDs was made clear.

2.27 Although it does not affect the soundness of the CSRIP, I recommend that, in order to demonstrate to users of the CSRIP that it takes proper account of the Community Strategy, the CD10.1.19 Table should replace the table entitled 'Community Plan' in Appendix D of the CSRIP (CC7) and the title of the Appendix should be expanded to refer to the Community Plan (CC6). However, I am satisfied that the CSRIP does have regard to the community strategy set out in the Community Plan and has properly taken the key themes forward. Test 5 is, therefore, satisfied.

3 Conformity, Coherence, Consistency and Effectiveness Tests (Tests 4B, 4C and 6-9)

3.1 ***Issue 1 – Is the CSRIP in general conformity with the RSS and does it have proper regard to the emerging RSS?***

3.2 The RSS for the area comprises Regional Planning Guidance for the South East (RPG9) together with the Milton Keynes and South Midlands Sub-Regional Strategy (S-RS). RPG9 was published in 2001. Four potential growth areas were identified in the wider south east. Under the heading of Potential Growth Areas, paragraphs 12.60-12.62 of RPG9 state that an inter-regional study should be undertaken to consider the further development potential of the Milton Keynes Sub-Region. National government's Sustainable Communities Plan was published in 2003 and identified a key role for the growth areas in ensuring the continued success of the

economy of the south east. The S-RS was the response to this national/regional impetus and spanned 3 adjoining regions. The S-RS underwent consultation and Examination in Public processes and is a review of parts of RPG9. It replaces paragraphs 12.60-12.62. At the time of the Examination, RPG9 and the S-RS 'ran alongside' one another to form the RSS for the area.

- 3.3 The borough now falls within the East of England Region and a review of RSS for that region is underway. At the time that this Report was prepared the East of England Plan (EEP) had been through the Examination in Public process, the Panel Report had been published and the SoS had published proposed changes. Further work to assess the EEP against the requirements of the European Habitats Directive and a single topic review of provisions relating to Gypsies and Travellers was underway.
- 3.4 The EEP will replace RPG9. However, in paragraphs 5.160-163 the EEP makes clear that it does not replace the S-RS. The 2 documents - the EEP and the S-RS - will together form the RSS until such time as the EEP is reviewed again, at which time the 2 will be merged. At the Hearings sessions it was suggested that this would be after 2011. Until they are merged, the EEP will provide the spatial strategy and generic policies for the borough as a whole whilst the S-RS will provide a more detailed strategic framework for that part of the borough identified as being within the Bedford/Kempston and North Marston Vale Growth Area.
- 3.5 Understanding of the relationships of RPG9 and the EEP, on one hand, to the S-RS, on the other, is key to understanding the basis on which the CSRIP provisions have been drawn up. Despite the contents of paragraph 3.6 and Appendix D, I do not consider that the submitted CSRIP is sufficiently clear in this regard and the lack of clarity adversely affects the overall coherence and soundness of the document. The Council proposes an amendment to paragraph 3.6 (PC28) to make the relationship clear to users of the Plan and, during the Hearings sessions, it proposed some changes to Appendix D to bring it up-to-date (IC18).
- 3.6 In my opinion, a change to paragraph 3.6 would be a useful addition in that it would enable users of the CSRIP to readily identify the relationship with the RSS. Minor alterations to the PC28 change which further clarify the relationship were discussed during the Hearing sessions and I consider that the CSRIP should be altered accordingly (IC4). As the change is only explanatory and does not alter the thrust of the CSRIP provisions, I do not consider that it needs to be consulted upon and it would have no effect on the sustainability appraisal report. The proposed changes to Appendix D are also largely descriptive and I am satisfied that they should be made.
- 3.7 Given the advanced stage that the emerging EEP has reached in the preparation processes, I am satisfied that, in-line with national

guidance, it would be proper to give it substantial weight in assessing the conformity of the CSRIP with RSS. So far as it relates to the area beyond the identified Growth Area and general policy areas, I consider that the CSRIP should generally conform with the emerging EEP whilst in the Growth Area the CSRIP should conform to the S-RS. In my view the CSRIP does this.

- 3.8 The East of England Regional Assembly (EERA) has confirmed that it considers the CSRIP and the PEC and EC changes to be in general conformity with the draft EEP and the S-RS and, in some cases, where detailed concerns were raised at earlier stages, these have now been overtaken by the SoS's Proposed Changes to the EEP.
- 3.9 The Council has suggested a change to the housing requirement in the rural area set out in Policy CP17 to bring it fully into line with the SoS's proposed changes to the emerging EEP. In the interests of consistency, I consider that the change should be made (IC15).
- 3.10 Policy H1 of the emerging EEP (as proposed to be changed) makes clear that the district housing targets should be seen as minimum targets to be achieved rather than ceilings which should not be exceeded. Policy CP17 of the CSRIP does not specify that the target should be a minimum target. However, the situation in the borough is somewhat unusual in that the housing requirement set by the emerging EEP relates only to the area outside the defined Growth Area. To indicate that the requirement set by Policy CP17 is a minimum target could lead to a large number of housing proposals outside the main area of intended growth. These could be difficult for the Council to resist and could ultimately undermine the Growth Area strategy handed down from regional/national level.
- 3.11 Proposed changes to Table 2 in Appendix F (as subsequently amended by changes suggested during the Hearing Sessions) (PEC21-23 and PC78) set out the way in which the rural area housing requirement will be monitored and how major variations from the target figure in Policy CP17 will be addressed. I am satisfied that this gives the necessary flexibility to the operation of the policy. In these circumstances I consider that there are sound reasons why Policy CP17 should not more closely conform to the wording of Policy H1 of the emerging EEP. Strategic Policy 1 of the S-RS does not specify the housing target for the Growth Area as a minimum figure and Policy CP6 is, therefore, correctly worded to reflect this. Again the flexibility afforded by the proposed changes to Appendix F would prevent rigid application of the policy from holding back housing delivery.
- 3.12 The Council has suggested a minor amendment to Objective 14 of the CSRIP (PC31) to more closely reflect the emphasis on community assets contained in the emerging EEP. While I consider that this change would be acceptable in that it provides consistency, it is important to understand that the CSRIP and the RSS will, together, form the development plan for the area. It is not

necessary, therefore, that the CSRIP should, in all circumstances, replicate the provisions of the RSS.

- 3.13 In these circumstances I am satisfied that, subject to the changes set out below, the CSRIP is in general conformity with the RSS and satisfies Test 4C.

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

PEC21, 22 and 23, PC31 and 78 and IC4, 15 and 18

- 3.15 ***Issue 2 – Whether the structure and format of the CSRIP is sufficiently coherent to enable the document to be used conveniently and to be clearly understood.***

- 3.16 The CSRIP is structured in a way which appears to set out strategic provisions for the Growth Area and for the remainder of the borough separately. It provides a strategic foundation for both areas on which the more detailed policies of the DCPDPD can be built. Given that the adopted strategy is so different for the 2 areas, I do not consider that, in principle, this division is a 'wrong' approach. However, from the evidence before me, it is clear that this has led the council into some difficulty. In my view, the description of the remainder of the borough as 'the rural area' is at least part of the cause of these difficulties. The term has a general meaning which is separate to the defined term employed in the DPD. In my view, it would add substantially to the clarity of the document if all references to 'the rural area' (where this is being used to describe the area outside the Growth Area) were to be changed to 'the Rural Policy Area' and all references to the defined 'growth area' were to be changed to 'Growth Area'. I have employed these terms throughout this Report and I recommend that these changes be made (IC1).

- 3.17 In preparing the CSRIP, it soon became obvious to the Council that some of the policies which it had drawn up for the Growth Area applied across the remaining part of the borough and that some of the policies drawn up for the 'rural area' applied to the 'rural' parts of the Growth Area. At this point I consider that the Council would have been best advised to re-assess the structure of the DPD. However, it did not and pursued the original structure with a series of cross-references. The outcome of this is that some policies in the chapter headed 'The Growth Area' and in sections dealing specifically with the Growth Area apply across the remainder of the borough and vice versa.

- 3.18 At paragraph 4.46 of the CSRIP, the Council seeks to explain this situation. However, as I was informed by the Council, even that explanation is incomplete in that Policy CP19, which appears in a section entitled 'Employment Development in the Rural Area' is not

mentioned in paragraph 4.46 but it also applies inside the Growth Area.

3.19 In my view, paragraph 4.46 by itself – even if amended to refer to Policy CP19 – is too insignificant and obscurely located to adequately explain the situation. I appreciate that the document should be read as a whole but one has to be realistic about the way in which the document will be used, particularly by those unfamiliar with the borough. I consider that this lack of coherence adversely affects the soundness of the submitted CSRIP. Ideally the CSRIP should be re-structured to avoid any confusion about which provisions apply to which parts of the borough. However, that would involve a major re-drafting exercise. The Council has suggested changes to paragraphs 4.45-46 (PC53 and 54), additional text after paragraph 4.6 (PC34), glossary changes (PC76) and cross references within some policies (PC44, 45, 48, 51, 52, 58, 62, 63, 65 and 67) to further clarify the position. Whilst not the ideal solution, I am satisfied that these changes (as further amended by changes IC9 and 19), together with the cross-references which already exist in the submission version of the document, go some considerable way to ensuring that users of the document will be aware of which policies are applicable to their own circumstances.

3.20 I conclude, therefore, that, subject to the changes set out below, the structure and format of the CSRIP is sufficiently coherent to enable the document to be used conveniently and to be clearly understood and, in that regard, the CSRIP satisfies Test 6.

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

PC34, 44, 45, 48, 51, 52, 53, 54, 58, 62, 63, 65 and 67
and IC9 and 19

3.22 ***Issue 3 – Whether the explanatory content of the CSRIP is sufficiently clear and coherent to enable the basis of the Council's strategy to be understood.***

3.23 In my opinion the submitted version of the CSRIP does not adequately explain its relationship to the Local Plan. Whilst it is stated that housing development '.. is expected to take place principally on sites within the Bedford Growth Area that are existing allocations ..', it is not made clear that these 'allocations' are, in fact, largely commitments and that they are sufficient (with windfalls which I deal with elsewhere) to deliver the whole of the housing requirement deriving from the S-RS. This is fundamental to an understanding of the CSRIP but is not made clear in the submitted version. Similarly, the relationship of the CSRIP's employment strategy to Local Plan allocations is not made clear. Some employment land provision required through Policy CP11

comes from existing commitments and allocations in the Local Plan. Their positions are not shown on Figure 2.

- 3.24 Without this background knowledge the CSRIP could mislead users of the document with regard to how much additional land for development is being sought and this adversely affects the document's coherence. The commitments/Local Plan allocations are the subject of saved policies in the Local Plan. Given their status as commitments, I consider that it would be inappropriate to undertake a re-assessment of these major sites for development. To do so would place a significant obstacle in the way of the growth strategy handed down to the Council. In my opinion, clarification of the fact that the former Local Plan allocations are now commitments is essential to understanding the Council's strategy and an explanation would resolve an area of potential unsoundness.
- 3.25 PPS12 advises that a Core Strategy should not identify individual sites. However, in circumstances where large scale development will be delivered from known commitments, I consider that the Core Strategy should be more specific in identifying those locations for development. To do otherwise obscures available information which would add to an understanding of the document.
- 3.26 Proposed changes to paragraph 4.17 (PEC9 as amended by PC40 and IC7) together with the insertion of explanatory text in paragraphs 4.38-40 (PEC6 as amended and added to by PEC13-15 and IC10, 11 and 20) clarifies the situation. Changes to Figure 2 (PEC8 and PC36) give additional information on the committed housing sites and information on employment site commitments. These changes are, in my opinion, essential to a proper understanding of the document and the information should be included. While the changes do not specify that many of the sites are 'greenfield' sites, I do not consider that making this point adds anything significant to the document.
- 3.27 The Council has suggested some minor changes to paragraph 1.3 (PC26 as amended by IC3) and Appendix C (PC75) to clarify and bring up-to-date the situation regarding policies 'saved' from the Local Plan. I agree that these changes should be made. However, I consider that it should also be made clear that planning decisions will be made in accordance with the 'saved' policies until such time as these are replaced. I have added a sentence to this effect to the end of paragraph 1.3 (IC3).
- 3.28 The Council argues that the CSRIP, when read as a whole, sets out the Spatial Strategy required by paragraph 2.9 of PPS12. However, an amendment to paragraph 4.8 (PC35) has been suggested which draws together the various strands of the Spatial Strategy into one place. I am satisfied that this would be a useful addition to the document although its absence would not necessarily render the document unsound. I recommend that it be included.

- 3.29 Various changes suggested by the Council clarify the role of the ADDPD and its relationship to the CSRIP (PC27, 39, 41, 43 and 57 and IC7 and 20). I do not consider that the submitted version of the CSRIP is sufficiently clear on this point although I appreciate that, at the time the CSRIP was submitted, the production of an ADDPD was not considered to be urgent to the delivery of the strategy. Production of the ADDPD has taken on increased importance since the CSRIP was submitted and this is reflected by it having been included in the latest LDS timetable. In the interests of clarity and overall coherence, I recommend that these changes should be made.
- 3.30 The CSRIP's objectives include the promotion of community safety. In my view this would include strategies for crime reduction through design. I do not, therefore, consider that there is any specific need to refer to the matter.
- 3.31 I am satisfied that matters such as leisure and recreation are adequately dealt with in the CSRIP and that the document provides sufficient basis for the development of detailed policies in future DPDs and SPDs.
- 3.32 With regard to Policy CP23 and CP25, I do not consider that the support provided to the Bedford to Milton Keynes Canal project should necessarily be deleted. In my view the terminology employed properly reflects the status of the proposal.
- 3.33 I consider that changes should be made to indicate that the Greenspace Strategy is a specific document (PC71 and 72). However, I can see no clear benefit in making specific reference to out-of-borough greenspace links. I do not consider that the CSRIP needs to give further emphasis to the Forest of Marston Vale project, either in the text, by including it on the Key Diagram or by including the target of providing 30% tree cover. It is enough that the matter is referred to in the emerging EEP alongside which the CSRIP should be read. I am satisfied that the matter of contributions can be addressed through saved Local Plan policies until such time as these are amended. In this regard, I consider that the CSRIP policies provide a proper strategic basis for more detailed policies which would be more appropriately set out in future DPDs.
- 3.34 An Area of Great Landscape Value identified through Policy NE14 of the Local Plan has been deleted. In my view this decision was soundly made in-line with the advice in paragraphs 24 and 25 of PPS7.
- 3.35 I conclude, therefore, that, subject to the changes recommended below, the explanatory content of the CSRIP is sufficiently clear and coherent to enable the basis of the Council's strategy to be understood.

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

PEC8 and PC35, 36, 39, 41, 43, 57, 71, 72 and 75 and IC3, 7, 10, 11 and 20

3.37 ***Issue 4 - Whether the provisions of the CSRIP set out a strategy for the location for growth which is consistent, coherent and flexible.***

3.38 The CSRIP's spatial strategy relies on the division of the borough into a Growth Area and a Rural Policy Area – effectively the remaining part of the borough lying outside the Growth Area. This derives from national/regional strategy regarding Growth Areas and, in particular, the S-RS. The S-RS defines the location of the Growth Area in very general terms although preparatory work on its production gave broad indications of the areas involved. The Council has taken this process forward in preparing the CSRIP and the extent of the Growth Area, focused on Bedford, Kempson and the North Marston Vale as required by the S-RS, is shown on the Key Diagram. I appreciate that the Key Diagram does not have an Ordnance Survey base. However, in most cases it is quite clear to me where the boundaries of the Growth Area lie and they could be quite easily interpreted 'on the ground'. In my opinion, this is not unacceptable. In circumstances where distinctly different policy approaches will be applied to different parts of the borough, it is important that users of the CSRIP should be able to identify which policies apply to the area in which they have an interest. I am satisfied that, in these circumstances, the Key Diagram shows an appropriate level of detail.

3.39 Given the parameters set by the S-RS and the commitments arising from the Local Plan allocations, the Council's strategic options in preparing the CSRIP were limited. Policy CP3 identifies the locations for growth as being within the urban area boundary and within the defined limits of Growth Area Key Service Centres (GAKSCs). The boundaries of these are shown in the Local Plan and have been drawn to contain the main commitment sites. All of these defined areas and, therefore, all of the major commitment sites which go towards satisfying the Growth Area development targets, are located within the identified Growth Area which, to a large extent, follows the Bedford/Kempston Urban Area boundary. It is clear to me that the Growth Area boundary has been drawn tightly to enclose these locations in order to concentrate development activity on the sites which will deliver important and necessary infrastructure and which are most sustainable. Expanding the Growth Area to include a larger area could divert development activity towards other, possibly greenfield, sites which would be easier to develop and would not deliver the wider infrastructure benefits. In the circumstances pertaining at the time the CSRIP was

submitted, I am satisfied that the Council had sound reasons for drawing the Growth Area boundary so tightly.

- 3.40 Nonetheless, the Council recognises that there may be a need to identify further allocations to meet housing and employment targets. Changes to national guidance regarding windfall housing sites, non- or slow performance on committed sites and possible changes to targets coming from the national/regional level during the lifespan of the CSRIP would all have an impact. The CSRIP anticipates this need by including Policy CP5 which sets out search sequences for additional sites. The search is clearly directed towards sites within the defined Growth Area. The first steps in the sequences are sites within the identified Bedford/Kempston Urban Area and the GAKSC boundaries. As these are all clearly within the identified Growth Area this presents no difficulty. However, subsequent steps refer to urban extensions and extensions to GAKSCs. Because the Growth Area boundary fits so tightly around the existing built-up areas, it could be that many potential extensions of these areas would fall outside the Growth Area shown on the Key Diagram. It could be justifiably argued by representors to future DPDs that the CSRIP's policies exclude consideration of such sites because they fall outside the identified area of search i.e. outside the Growth Area. The result could be that the Council's search for sites could be trammelled by rigid drawing of the Growth Area boundary and that sites, possibly sites with the best sustainability credentials, would be excluded from consideration.
- 3.41 The Council is caught in something of a dilemma in these circumstances. On the one hand it needs to draw the Growth Area boundary tightly in order to concentrate development pressure on existing committed sites, whilst on the other hand it needs the flexibility to look outside the indicated Growth Area to find additional sites which are sustainable should the requirement arise. The need for flexibility is particularly important given the 'direction of travel' set out in national government's Green Paper – Homes for the Future: More Affordable, More Sustainable which indicates increased focus on housing delivery in Growth Areas in the future.
- 3.42 The Council has consistently argued that the Key Diagram is, as its name suggests, diagrammatic, that the Growth Area boundary is only conceptual and that, should the need arise to consider urban extension sites, the Growth Area boundaries are sufficiently 'flexible' to allow this to happen. If this is so then I consider that that message does not come across clearly in the CSRIP. My view is confirmed by various discussions which took place during the Hearings sessions where representors appeared to be confused on the issue. While I note the Council's stated intentions in this regard, I consider that treating the Growth Area boundary as being 'conceptual' is problematic in a DPD based on the division of the district into 2 distinct policy areas and could lead to a considerable degree of confusion. As an example: how would the Growth Area/Rural Policy Area housing targets be calculated if there is no

clear distinction between the 2 policy areas? The problem is compounded by what I consider to be the general perception amongst representors that the boundaries are clearly defined and are fixed.

- 3.43 In order to address this issue I have recommended that the Council makes a change which, in additional text, explains that the Growth Area boundary may need to change in the future to accommodate additional sites (EC1). Further minor amendments to the change were suggested during a Hearing Session. The change has been advertised in accordance with the advice in PPS12 and the sustainability appraisal has been re-assessed. In my view, the change is essential to the soundness of the CSRIP in that it makes the document provisions coherent and consistent with one another and provides the flexibility which is necessary to react to changing circumstances. In its amended form the change makes clear that the 'trigger' for looking at urban extension sites should come from monitoring by the Council and that changes should be undertaken as part of the plan-making process. The change is firmly linked to the Policy CP5 search sequences and would not, therefore, permit development to spread away from the Growth Area envisaged in the S-RS. I envisage any minor changes to the Growth Area boundary coming through the ADDPD process. Such changes would not, therefore, involve an additional stage of plan-making in normal circumstances although any necessary substantial changes may involve the Council in a reappraisal of the CSRIP. I recommend that the change should be made.
- 3.44 The Council has suggested an amendment to Policy CP5 (PC42) to clearly indicate that the allocation of additional sites will follow the search sequences set out in the policy. In the interests of coherence I consider that this amendment should be made. In my opinion the search sequences employed are soundly based and are the most likely to deliver sustainable layouts in overall terms. I am satisfied that the requirements of Policy CP2 will focus the search for sites on previously-developed land in accordance with national guidance.
- 3.45 A proposed change to paragraph 4.48 (PC57) clarifies that, until reviewed in the ADDPD, the SPA boundaries are drawn from the Local Plan. I consider that this information is necessary to ensure that users of the document are aware of the boundaries of the areas involved. In my opinion this also needs to be made clear in respect of the defined limits of settlements in the Growth Area and I recommend adding appropriate text to paragraph 4.15 (IC6). I do not consider that the SPA boundaries should be reviewed as part of the CSRIP, which, as its name suggests, should concentrate on strategic issues. A more detailed DPD would be the proper place for such an assessment to take place.
- 3.46 A proposed amendment to paragraph 4.14 (IC5) explains that the Local Plan Development Brief boundary for Shortstown should be

treated as the SPA boundary for that settlement. This clarifies an anomaly in the document and the change should be made.

3.47 The Key Diagram mistakenly shows the settlement of Shortstown as falling within the Urban Area defined in the Local Plan. The Council has proposed that this be corrected by an amendment to the Key Diagram (PC74). I agree that the amendment should be made.

3.48 I conclude that, subject to the changes set out below, the provisions of the CSRIP set out a strategy towards the locations for growth which is consistent, coherent and flexible. In this regard I am satisfied that the CSRIP satisfies Tests 6, 7 and 9.

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

EC1, PC42, 57 and 74 and IC5 and 6

3.50 ***Issue 5 – Whether the provisions of the CSRIP would be realistically capable of delivering the requirement for new housing.***

3.51 The housing requirement which the CSRIP seeks to deliver falls into 2 parts: the S-RS requires 16270 additional dwellings to be provided within the Growth Area during the plan period whilst the emerging EEP requires 1300 additional dwellings to be provided in the remainder of the borough. I consider that the CSRIP clearly and properly reflects the RSS guidance in this regard and I am satisfied that the 2 requirements should be addressed separately.

Growth Area

3.52 In my view the submitted version of the CSRIP does not go far enough in explaining the housing supply situation. The strategy for delivery is obscure and could be misleading to some users of the document. In my view this lack of a coherent explanation, in part, renders the submitted document unsound.

3.53 A proposed amendment to paragraph 4.17 (PEC9 as amended by PC40 and IC7) clarifies the background to the housing requirement in the Growth Area and the current position on supply. The S-RS recognises that sites which were allocated in the Local Plan are sufficient to deliver the majority of the requirement. A proposed amendment to Objective 1 of the CSRIP (PC29) clarifies that it is these allocated sites which the council is seeking to deliver. A substantial addition to Appendix F proposed by the Council (PEC21-24), together with changes to Figure 2 (PEC8), clarify the sources of supply. An up-to-date version of the PEC24 amendment is contained in the Council's statement ref. CD 10.1.1 BBC 6(1) (IC20). I am satisfied that the proposed amendments (including the up-to-date version of PEC24 and consequential changes to the PEC9 version of paragraph 4.17 – see IC7) clarify the situation. The

changes should, therefore, be made. In my view only sites which are reasonably certain of delivery have been included. I have seen no evidence to persuade me that other sites should be included either in the Appendix F tables or on Figure 2. I have seen no evidence to persuade me that the Council's expectations in terms of delivery from the commitment sites are unrealistic.

- 3.54 The supply figures include contributions from town centre sites identified in the Council's Town Centre Area Action Plan. Given the stage that this document has reached in the DPD preparation process, I am satisfied that these are properly included although Examination of that document may result in necessary changes.
- 3.55 The CSRIP was submitted in July 2006. At that time national guidance on housing issues was provided by Planning Policy Guidance (PPG) 3: Housing although a consultation paper on a revision to the guidance was in the public domain. Revised housing guidance was issued in November 2006 - PPS3: Housing. At paragraph 59 this states that allowances for 'windfalls' should not be included in the first 10 years of land supply unless there are genuine local circumstances that prevent specific sites from being identified. The PPS3 guidance is absolutely clear. However, the Council's housing supply calculations which underpin the CSRIP make an allowance for windfalls and reference is made to these in proposed changes PEC9 and PEC24. In my view the CSRIP is clearly inconsistent with national guidance in this regard and fails to satisfy Test 4B.
- 3.56 While the Council argues that its past record on housing provision from 'windfall' sites indicates that it would have no difficulty in delivering the predicted levels of supply from such sources, I do not consider that this, by itself, is sufficient grounds to warrant a departure from national policy. However, a number of factors weigh in favour of the Council's case:
- a) the CSRIP was in accordance with national guidance when it was submitted;
 - b) the 'windfall' allowance is quite small in terms of overall supply, just over 12%;
 - c) as part of the forthcoming Strategic Land Availability Study the Council will seek to identify any sites which are no longer suitable for employment development and can be allocated to residential use, sites which may well have come forward as 'windfalls' in any event; and
 - d) the Council has brought forward an Allocations and Designations DPD in its LDS timetable which will enable necessary additional residential allocations to be identified.
- 3.57 In these circumstances, I am satisfied that the Council has ample opportunity to address the inconsistency with national guidance. If 'windfalls' fail to come forward at the predicted rate, housing delivery would not fall far behind target levels and the more

expeditious development of existing commitment sites and/or other identified sites could fill the gap. I consider that there are clear prospects that housing supply could be made up from these sources. I do not, therefore, consider that the inconsistency would result in any significant problem of housing supply in the short-term or that there is an immediately urgent need to make additional allocations. However, as it stands, the submitted CSRIP fails Test 4B. It is essential that the inconsistency be resolved and I have added a footnote to Table 3 of Appendix F (IC20) to indicate that 'windfalls' will not be relied upon and will be subsequently replaced by provision derived from the managed release of brownfield/employment sites and other necessary allocations identified through the preparation of the ADDPD.

- 3.58 Housing delivery in the 2001-5 period has been below target. However, much of the predicted housing supply comes from large sites many of which have infrastructure requirements and development difficulties. I accept that the lead-in time for such sites can be long. Many of the negotiations surrounding development have now been completed, appropriate legal agreements have been signed, necessary infrastructure is committed and planning permissions have been granted. From the evidence put before me in the Hearing sessions, I am satisfied that housing delivery from the allocated sites is being actively progressed and that the procedural obstacles which have held back housing delivery in the recent past have now been overcome. The necessary foundations which will enable a 'step-change' in delivery to occur are now in place and I heard evidence at the Hearing sessions that the Council had employed some imaginative and novel arrangements with its development partners to bring forward development. I have no reason to doubt that the major sites will begin to deliver the predicted levels of housing in the very near future. I am satisfied, therefore, that the CSRIP identifies sufficient available and suitable land to achieve a 5 year supply and that specific developable sites are available to satisfy supply needs for the following 5 years and beyond. If they do not, the CSRIP has provisions which will enable shortfalls to be identified and addressed. Clearly increases in housing delivery over and above the targets set by Policy CP6 are essential to bring the housing trajectory back into line. A proposed change to paragraph 4.22 (PC43) makes clear that delivery over the remaining plan period will need to accelerate to achieve the Policy CP6 targets. I recommend that this change should be made. However, in overall terms, I am satisfied that the housing strategy of the CSRIP is capable of delivering the required amount of housing in the Growth Area.
- 3.59 The Annual Monitoring Report contains a housing provision trajectory which can be regularly up-dated. In my opinion it is unnecessary to include this information in the CSRIP. I consider that Policy CP6 together with the information added by IC20 is sufficient to illustrate the current state of supply.

Rural Area

- 3.60 Evidence put before me during the Hearing sessions (CD10.1.1 BBC 8 paragraph 45) shows that, from the beginning of the plan period until the end of March 2007, 1078 dwellings had been completed in the area outside the Growth Area and that there were 270 outstanding planning permissions: a total of 1348 dwellings. This exceeds the requirement set by the emerging EEP for the whole of the plan period. However, much of that provision has been delivered from a number of medium-sized Local Plan housing allocations in villages in the rural area. A relatively small number of Local Plan allocations have not yet received planning permission and some additional provision is likely to arise from sources such as necessary affordable housing and essential worker dwellings. The target figure is, therefore, likely to be further exceeded although not by an excessive amount. I have already concluded that the target figure in Policy CP17 should not be expressed as a minimum figure for the reasons which I have set out. However, I am satisfied that the Council's monitoring approach allows sufficient flexibility to deal with the slight level of over-provision which is likely to arise. I do not consider that level of over-provision foreseen would have any significant effect on the overall housing strategy.
- 3.61 In my opinion the submitted version of the CSRIP does not adequately explain the situation regarding housing in the rural area and users of the document could be misled into thinking that considerable opportunities for development exist. In my view this, together with other areas where there is a lack of clarity, render the submitted document unsound. The Council proposes additional text after paragraph 4.53 (PEC 16) which goes some way towards explaining the situation. However, both paragraph 4.53 and the PEC16 paragraph can be further amended and altered to reflect the up-to-date position on the RSS requirements and the up-to-date housing delivery information contained in CD10.1.1 BBC 8. Proposed additions to Appendix F (PEC24) further explain the rural housing delivery position. This, too, can be up-dated to give a more accurate picture of the current supply position. I consider that these amendments are sufficient to enable users of the document to understand the context within which the CSRIP policies, and Policy CP17 in particular, will be applied. These amendments should be made. I have made my own alterations in order to bring the document up-to-date (IC14 and 20).
- 3.62 Policy CP8 is in-line with up-to-date national guidance on affordable housing and provides strategic direction which other DPD policies and SPD can build upon. I am satisfied that there are sound reasons for the threshold specified for sites in the smaller villages and that the policy is sufficiently flexible to direct affordable housing resources to appropriate locations should this be necessary. The Council proposes a change to page 4 of the CSRIP to clarify this point. I have added further changes to clarify its

meaning (PC25 amended by IC2). I also recommend that paragraph 4.28 be amended to reflect the up-to-date position on national guidance (IC8).

3.63 Policy CP7 requires a housing mix which would meet the needs of the community and is in-line with advice in PPS3. I accept that site characteristics will influence the design of development and circumstances may occasionally arise where, on these grounds, a particular dwelling type is unacceptable. However, I do not consider that dwelling types which are required to meet the identified needs of the community should be excluded because of 'site characteristics'. The challenge will be to produce imaginative designs which suit the site whilst, at the same time, meet the identified needs.

3.64 I conclude, therefore, that, with the proposed changes, the provisions of the CSRIP would be realistically capable of delivering the requirement for new housing. I am satisfied, therefore, that the CSRIP satisfies Tests 6, 7, 8 and 9 in this regard.

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

PEC8, PC29 and 43 and IC2, 7, 8, 14 and 20

3.66 ***Issue 6 – Whether the provisions of the CSRIP would be realistically capable of delivering the required amount of employment land.***

3.67 The emerging RSS sets targets for the growth in jobs for the plan period which should be employed for monitoring and guidance purposes. LDDs should enable the achievement of these targets. The targets handed down to the Council are not split into individual local planning authority areas but, by applying previously employed apportionment rates, the Council has derived a target figure of 16,000 net additional jobs. A proposed change to paragraph 4.6 explains how this target will be applied across the borough (PC33).

3.68 The Bedford Employment Land Study published in 2006 suggested that 75ha of additional employment land needed to be brought forward to enable a choice to be offered to developers for quality Class B1 sites during the plan period. Policies CP10 and CP11 of the CSRIP seek to deliver these targets. I have seen no evidence to suggest that the work undertaken to identify these figures has not been robust. Some of the required land has already been committed and preparation of the ADDPD will enable the identification of necessary additional sites. No evidence has been put before me to persuade me that the Council, working alongside other agencies, would be unable to meet the necessary land requirements. I am satisfied that the provisions of the CSRIP seek to provide a balance between jobs and new housing. However, I agree with the Council's view that a shortfall against the job

provision target should not be employed to restrain housing delivery. This would run counter to the national/regional emphasis on housing delivery. In my opinion any shortfall would be better addressed by new measures to increase jobs delivery. Proposed amendments to the CSRIP's monitoring regime (PEC23 as amended by PC78) would provide a trigger for a review of policy should jobs provision fall behind target. In my opinion, this amendment is essential to ensure that a balance is maintained.

- 3.69 Proposed changes to Policy CP11 (PC52) and paragraph 4.39 (PEC15) indicate that the search for Class B1 sites and strategic employment sites will focus on the Growth Area in accordance with the methodology set out in Policy CP5. In my opinion, this clarifies the way in which the document will be applied and the amendments should be made.
- 3.70 Proposed amendments to Policy CP11 (PC52) and paragraph 4.40 (PEC14 as amended by IC11) delete reference to the methodology for assessing whether or not employment land can be released to other uses. It is proposed that the references be replaced by an indication in paragraph 4.41 and Policy CP11 (PC50 and 52) that the criteria will be set out in the ADDPD but that the loss of such sites will only be considered where the retention of the site is unnecessary and specific benefits would accrue. In my opinion, this is a satisfactory approach: as amended the CSRIP would set out the general framework for consideration of the matter whilst leaving the detail to a more appropriate document. I consider that the changes should be made.
- 3.71 Proposed changes to paragraphs 4.33-4.41 of the CSRIP insert information on the supply of employment land (PEC13 and 14). In addition changes to Figure 2 (PC36) identify where employment commitments are located. Additional information bringing the land supply table up-to-date was provided during the Hearings sessions by the Council. Whilst I consider that an up-to-date synopsis of the information is helpful in explaining the current supply information, I consider that, in the interests of consistency of layout, the proposed paragraph 4.38a and associated table would be better included in Appendix F alongside information on housing supply. I have recommended this change (IC20) together with small consequential changes to the text in paragraph 4.38 (IC10).
- 3.72 Proposed amendments to Policy CP5 and paragraph 4.20 (PEC1 and 2) and to paragraph 4.63a (PEC18) make clear that the defined town centre will be the preferred location for office development. These amendments would bring the submitted CSRIP in-line with national guidance in PPS6: Town Centres. The amendments should be made in order to satisfy Test 4B. Proposed changes to paragraphs 4.63 4.66 and 4.67 (PEC18 and 19 and PC68) clarify the Council's general strategy towards the Town Centre and provide a strategic basis for the Town Centre Area Action Plan. While I note concerns that the concentration of development in town centres

could add to traffic and parking problems, such locations are recognised as offering the best opportunities for developing effective public transport strategies. The extent of the defined town centre will be considered through the examination of the Town Centre Area Action Plan DPD.

3.73 Core strategies should not normally make new site specific allocations. In my view the ADDPD would be the proper place to identify locations for strategic business/employment sites (should any be required) following full consideration of all available sites. I am satisfied that the CSRIP (with the proposed changes) goes as far as is necessary in this regard.

3.74 I deal with the issue of existing employment sites in the rural area in paragraphs 3.84-85 below.

3.75 I conclude that, with the recommended changes, the provisions of the CSRIP would be realistically capable of delivering the required amount of employment land. I am satisfied, therefore, that, in this regard, the CSRIP meets Tests 4B, 6, 7, 8 and 9.

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

PEC15, 18, and 19, PC33, 36, 50, 52, 68 and 78 and IC10, 11 and 20

3.77 ***Issue 7 – Whether the CSRIP's provisions for the rural area are consistent with national planning policy and properly reflect circumstances in the borough.***

3.78 In my opinion the section of the submitted CSRIP entitled 'Sustainable Rural Communities' is muddled, uses imprecise language and is at variance with the advice in PPS7: Sustainable Development in Rural Areas. I have no doubt that, in attempting to apply the policies, the Council and users of the document would find themselves in some considerable difficulty in explaining the meaning of the policies and their relationship to national guidance. I consider that the section lacks coherence and consistency with national guidance and is, therefore, unsound.

3.79 However, the Council propose a number of changes to address these deficiencies. In addition, changes have been suggested by some representors. Some of the changes, particularly changes to Policies CP12, CP13, CP14 and CP15, go beyond explanation and clarification of the CSRIP. However, the changes bring the policies into line with the national guidance and I am therefore satisfied that they can be made without the interests of any person being prejudiced.

- 3.80 I have already recommended that proposed changes to paragraphs 4.45 and 4.46 (PC53 and 54) should be adopted in order to clarify the distinction between the Growth Area and the Rural Policy Area and the areas in which various policies would be applied. A small change to paragraph 4.47 would also assist (PC55 as amended by IC12).
- 3.81 Policies CP13 and CP15 deal with similar issues and the Council proposes their amalgamation, together with changes to the terminology employed (PC59-62). These changes would remove inconsistency between the CSRIP and the guidance in PPS7. The list of acceptable development in the rural area contained in Policy CP15 is incomplete when compared to the advice in PPS7. The proposed changes also overcome this inconsistency. I recommend that, in the interests of consistency, the changes be made.
- 3.82 Policy CP14 employs a number of imprecise descriptions such as 'limited development', 'limited infill development' and 'small scale development'. None of these are quantifiable and the distinction between them is unclear. In my view, the terminology is so unclear that it renders the policy unsound. However, from discussions which took place during the Hearings Sessions, the import of the policy is clear: that development in the countryside should be concentrated in identified Key Service Centre (KSC) villages and that development in other settlements would be strictly controlled. While such an approach is not fully in-line with the advice in paragraphs 3 and 4 of PPS7 (which also makes allowance for development 'near to' local service centres), it seeks to direct development to those locations where services and facilities exist or could be provided and this general approach is in-line with the guidance. Alternative wording for Policy CP14 was suggested by a representor during the Hearings sessions. That wording closely follows the national guidance and, in my view, its meaning is clearer than the CSRIP version of the policy. I recommend that, with some minor changes, the policy is amended in-line with the alternative wording but is also amended to indicate that it applies only to development which needs to be located in the Rural Policy Area (IC13).
- 3.83 Policy CP16 identifies the KSCs in the part of the borough outside the Growth Area. From the evidence which has been put before me, I consider that KSCs have been chosen largely on the basis of the existing range of facilities which they provide and the size of their populations. This has led to a geographical spread which is somewhat uneven with no KSC being identified in the north eastern part of the borough. However, I was informed by the Council that this part of the borough is relatively sparsely populated and the larger settlements of St Neots and Rushden/Higham Ferrers, which provide local focus, are located just beyond the borough boundary. In these circumstances, I am satisfied that there is no immediate need to identify additional KSCs in this part of the borough. Those KSCs which are identified in the CSRIP are located relatively close together and I am satisfied that they are more than sufficient to

provide the sort of focus to the surrounding rural area which is envisaged by PPS7. In my opinion, there is no need to identify additional KSCs in these parts of the borough.

- 3.84 Within the rural part of the borough outside the Growth Area there are a small number of large employment sites together with a much greater number of smaller employment sites. The submission version of the CSRIP makes reference to the larger sites in paragraphs 4.35 and 4.56. It identifies them as being important and states that some development is likely to occur at these locations. Proposed changes (PEC12 and 17) delete these references. However, a further proposed change (PC66) re-introduces the reference into paragraph 4.56 with the indication that development within those sites and elsewhere will be dealt with in accordance with saved policies until such time as these are replaced by policies in the forthcoming DCPDPD.
- 3.85 The changes to CP13 and CP15 which I recommend above (PC62) would be permissive of development which is in-line with advice in PPS7. This would include economic development associated with existing employment sites. A Core Strategy DPD should not normally be site specific and should not therefore identify sites in accordance with paragraph 5(i) of PPS7. A detailed policy as described by paragraph 5(ii) would be more appropriately included in the DCPDPD. However, until the matter is reviewed, I am satisfied that the saved Local Plan policies will provide an adequate basis for decision making and the generally supportive tone of the advice in paragraphs 2, 4 and 5 of PPS7 (as applied through the amended Policy CP13/15) would be sufficient to allow proper consideration of employment proposals in the part of the borough outside the Growth Area. This, together with the specific recognition which derives from the PC66 reference to employment sites outside the Growth Area and to the saved policies, gives the matter proper recognition in the CSRIP. The change should be made. In my view any further consideration of the futures of these sites should be more appropriately dealt with in other, more detailed, DPDs.
- 3.86 The reference to 'an exception site' for affordable housing in Policy CP18 could be mistakenly construed as meaning that only a single exception site would be considered. The Council made clear to me that this was not the intention and proposes a minor amendment (PC65) to clarify the matter. In the interests of clarity I recommend that the change be made.
- 3.87 In paragraphs 3.60-65 above, I have already recommended changes to paragraph 4.53 and to Policy CP17.
- 3.88 I conclude that, with the recommended changes, the CSRIP's provisions for the rural area are consistent with national planning policy and properly reflect circumstances in the borough. I am satisfied, therefore, that the CSRIP meets the requirements of Tests 4B, 6, 7, 8 and 9 in this regard.

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

PC53, 54, 59-62, 65 and 66 and IC12 and 13

3.90 ***Issue 8 – Whether the CSRIP deals with climate change in accordance with national guidance.***

3.91 Policy CP27 of the CSRIP deals with pollution, climate change and water issues. I am satisfied that parts i), ii), iii), vi), vii) and viii) of the policy comply with national guidance contained in PPS23: Planning and Pollution Control, PPS22: Renewable Energy and its companion guide, and PPS10: Planning for Sustainable Waste Management and are generally consistent with the policies of the emerging EEP.

3.92 At the time that this Report was prepared the Supplement to Planning Policy Statement 1: Planning and Climate Change had recently been published. This, together with PPS22 and its companion guide, provide the most up-to-date national guidance on climate change issues. Paragraph 8 of PPS22 advises that local planning authorities may include policies in LDDs which require a percentage of energy used by a development to come from on-site renewable sources. The related companion guide advises that a policy requiring the provision of renewable energy in major new developments could be included in a Core Strategy, supported by a Supplementary Planning Document (SPD).

3.93 Part iv) of Policy CP27 sets targets for reduction in carbon emissions in all new residential developments and other developments of more than 500m². I accept the Council's argument that reference to an overall carbon emissions target provides flexibility in the ways that the overall goal of reducing carbon emissions can be achieved. At the Hearings the Council gave as examples measures which reduce wastage such as the employment of automatic light switching and low-energy lighting systems but more detailed and specific measures would be contained in the Council's forthcoming Climate Change SPD. In my view the Council should not be dissuaded from the adoption of such innovative measures. Whilst I have seen no clear evidence to justify either the 10% reduction target or the thresholds above which the target would be applied, I have seen no evidence to persuade me that they are inherently unsound. In my view a 10% reduction would not be a target which could be achieved only by substantial increases in building or other costs. In these circumstances, I am satisfied that the requirement would not be unrealistic and should be retained.

- 3.94 However, up-to-date national guidance places considerable emphasis on the expectation that a proportion of energy supply to new development should be secured from decentralised and renewable or low-carbon energy sources. The SoS's proposed changes to Policy ENG1 of the emerging EEP follow this general thrust of national guidance by concentrating on the provision of energy supply and generation at the local level. The matter is such a strong thread in national/regional policy that I consider that it needs specific mention in the CSRIP.
- 3.95 Paragraph 26 of the Climate Change Supplement makes clear that the target for energy generation set by local policies, together with the type and size of development to which that target would be applied, are matters for local determination. Paragraph 33 states that policies dealing with such matters should be set out in a DPD, rather than an SPD. I have seen no evidence to suggest that, at present, the Council would be in a position to provide the local justification necessary for the type of policy envisaged by paragraph 26 of the Supplement. The guidance contains no general advice on proportions of energy or site thresholds which would provide the basis for an interim policy to guide development until such time as local policy is formulated. However, as recently as December 2006, the SoS proposed changes to Policy ENG1 of the EEP which specified that, as an interim measure, 10% of the energy consumed in substantial new development should come from on site renewable and/or decentralised renewable or low carbon energy sources. 'Substantial' development was defined at that time as buildings with an individual or aggregate useful floor area of more than 1000m². Whilst the published Climate Change Supplement moves away from the requirement that energy generation should be 'on site', I nonetheless consider that the thresholds set out in emerging Policy ENG1 give a clear indication of the thresholds which the SoS would consider could be reasonably applied as an interim measure. I consider that part iv) of Policy CP27 should be changed accordingly. This would bring it into general conformity with Policy ENG1 of the emerging EEP and would satisfy Test 4C. However, it needs to be made clear that the target and thresholds are to be used as a guide in the interim period, that they will be employed flexibly and that local targets and thresholds will be drawn up as a matter of urgency.
- 3.96 I have amended part iv) of the policy and its supporting text accordingly (IC17). In line with Policy ENG1 of the emerging EEP, the targets should be set as minimum levels. This would allow higher requirements to be made if these were to be justified by changes to national guidance.
- 3.97 Part v) of Policy CP27 deals with building performance issues. Environmental performance standards are set nationally by the Building Regulations. However, the Climate Change Supplement indicates that higher levels of performance can be required by policy to support local development or site specific opportunities.

Such an approach needs to be justified and, amongst other things, should focus on specific development opportunities. Contrary to draft national guidance, part v) of Policy CP27 as drafted would apply across the whole of the borough and is not linked to specific opportunities. I have seen no evidence which demonstrates to me that divergence from the national standards is justified in this borough. In these circumstances I consider that part v) of Policy CP27 should be changed to bring it into line with national guidance. In addition, the policy should also reflect possible changes to national policy which may derive from the consultation exercise on The Future of the Code for Sustainable Homes: Making a Rating Mandatory. In my view, with these changes, the Council's approach to climate change issues would be in-line with national and emerging regional guidance and would embody an appropriate degree of flexibility which would enable it to respond to changing requirements and emerging opportunities. I recommend appropriate changes (IC17).

3.98 Other elements of the CSRIP deal with sustainable travel issues. For instance, Policy CP2 requires that climate change issues should be properly addressed and that car use should be minimised whilst the search sequences in Policy CP5 prioritise the use of land within existing settlements and sites which are well-related to public transport routes. Policy CP30 encourages sustainable modes of transport. In my view the Council's approach is entirely consistent with SoS's proposed changes to Policies T1-T4 of the emerging EEP. These changes place considerable emphasis on sustainable travel. It is important to remember that the CSRIP needs to be read alongside the RSS and, whilst the CSRIP needs to be in general conformity with the RSS, it does not need to replicate it. In all the circumstances, I am satisfied that the CSRIP pays proper regard to the emerging EEP in the way it handles the issue of demand for travel.

3.99 To some extent Policy CP27 appears to repeat and expand on the provisions of part vii) of Policy CP22. It may be helpful to include a cross-reference in paragraph 4.76 to indicate that other provisions of the document apply although, by itself, this does not affect the soundness of the document. I have recommended an appropriate change (CC5). The Council proposes changes to Policy CP22 (PC70) and paragraph 4.76 (PC69) to clarify that the term 'groundwater' is intended to refer to the whole of the water regime. In the interests of overall clarity of meaning I recommend that these changes should be made.

3.100 I conclude therefore that, with the changes recommended, the CSRIP deals with climate change in accordance with national guidance. I am satisfied that it satisfies Tests 4B, 6, 7, 8 and 9 in this regard.

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

PC69 and 70 and IC17

3.102 *Issue 9 – Whether the proposals for meeting the needs for accommodation for Gypsies, Travellers and travelling showpeople are in accordance with national guidance.*

3.103 At the time that this Report was prepared a single issue review of the emerging EEP was being undertaken in order to assess the requirement for sites to meet the needs of Gypsies, Travellers and travelling showpeople. A sub-regional Gypsy and Traveller Accommodation Assessment (GTAA) had been completed for the area including Bedford Borough. In line with the advice contained in paragraph 22 of ODPM Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites, that information will form a key component in the assessment of need which will inform the review of the EEP. It is for the RSS to identify the number of pitches required in each local planning authority area.

3.104 The Council proposes changes to Policy CP9 and its supporting text (PC46-49) to bring the CSRIP up-to-date with this position. I accept that, until clear direction is provided from the regional level, the GTAA will form an important part of the evidence base on which development control decisions will be made. However, once direction is provided from the RSS, the GTAA will become less important. Policy CP9 and its supporting text need to reflect this and I have made appropriate changes (IC9).

3.105 Some of the criteria specified in Policy CP9 need to be changed to clarify their meaning and to bring them fully into line with the Circular advice. I have amended part iii) of the policy to comply with paragraph 52 of the Circular and I have amended part vi) to more accurately reflect paragraph 54. I have amended part iv) in the interests of clarity and to properly reflect the appropriate test. I have added an additional criterion to reflect the advice in paragraph 64 e) of the Circular (IC9).

3.106 I recommend that the changes proposed by the Council (as amended by alterations of my own) should be made. They bring the submitted version of the policy and its supporting text up-to-date and more fully into line with national guidance and would satisfy Test 4B.

3.107 The GTAA does not cover the needs of travelling showpeople although a separate study was undertaken in 2007. Recent national guidance has been published on this subject: CLG Circular 04/2007: Planning for Travelling Showpeople. The criteria set out in Policy CP9 reflect the advice in the Circular and could be generally applied equally to sites for travelling showpeople. However, I consider that a change should be made to the text (IC9) to indicate that travelling showpeople have not been specifically dealt with in the

GTAA and that their proposals will be dealt with in accordance with the Circular advice.

3.108 I conclude, therefore, that, with the recommended changes, the proposals for meeting the needs for accommodation for Gypsies, Travellers and travelling showpeople are in accordance with national guidance and the emerging RSS. I am satisfied, therefore, that the CSRIP satisfies Tests 4B, 4C, 6 and 7 in this regard.

3.109 In order to make the Core Strategy sound, the following change is required:

IC9

3.110 ***Issue 10 – Whether the CSRIP deals properly with transport infrastructure issues.***

3.111 The Council proposes changes to Table 1 in Appendix F of the CSRIP (PC77) to bring information on the delivery of infrastructure up-to-date. While not affecting the overall soundness of the document, I consider that these changes provide useful clarification. A small change to paragraph 4.101 provides a necessary reference (PC73).

3.112 Infrastructure improvements are clearly an important part of the 'step change' in the role of the borough which the Council is seeking. Delivery of infrastructure is linked to the delivery of major development sites. In my view the CSRIP properly sets out the elements of infrastructure which will go towards overall delivery of the strategy. PC77 brings infrastructure delivery information up-to-date. I appreciate that delivery of the infrastructure will, in many cases, be outside the Council's control. Nonetheless, I am satisfied that the CSRIP (as amended) goes as far as is necessary in linking development and infrastructure.

3.113 I conclude, therefore, that, with the recommended changes, the CSRIP deals properly with transport infrastructure issues. I am satisfied, therefore, that the CSRIP complies with Tests 4A, 6 and 7 in this regard.

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

PC73 and 77

3.115 ***Issue 11 – Whether the monitoring regime set out in the CSRIP is sufficiently comprehensive to enable delivery of the document's provisions to be properly assessed and to give flexibility in response to any important shortfalls.***

- 3.116 The CSRIP's monitoring regime is set out in Policy CP32 and Appendix F. Table 2 in Appendix F sets out the indicators in the Annual Monitoring Review which will be employed to assess performance against the CSRIP's policies. However, in its submitted form, I do not consider that the CSRIP goes far enough in identifying triggers which will generate reviews.
- 3.117 The Council proposes substantial amendment of Appendix F in PEC21-24. Further changes were suggested during the Examination (PC77-79). With the proposed changes, I am satisfied that the CSRIP contains a proper framework which will allow monitoring of delivery against robust targets and identifies clear mechanisms which will trigger reviews.
- 3.118 In my opinion the triggers should properly activate reviews in circumstances where either under-provision or over-provision against targets is identified. I appreciate that some targets, in particular some housing targets, are set as minimum levels. However, large-scale over-provision needs to be recognised and addressed if imbalances in the provision of other complementary development are to be avoided. I am satisfied that the targets set by the CSRIP provide sufficient flexibility to accommodate a level of over-provision where this is appropriate.
- 3.119 The CSRIP places great reliance on the delivery of development from a small number of large sites. Delays in delivery from single sites could, therefore, have significant effects on targets. I consider that assessment over a 5 year rolling period is acceptable in order to ensure that 'knee-jerk' reactions to short-term shortfalls against targets are avoided.
- 3.120 I conclude therefore that, with the recommended changes, the monitoring regime set out in the CSRIP is sufficiently comprehensive to enable delivery of the document's provisions to be properly assessed and to give flexibility in response to any important shortfalls. I am satisfied that the CSRIP meets Tests 8 and 9 in this regard.

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

PC77, 78 and 79

4 Minor Changes

- 4.1 There are a small number of minor changes which correct and update various parts of the text. Although these changes do not address key aspects of soundness, I endorse them on a general basis in the interests of clarity and accuracy. These changes are shown in Annexe B.

- 4.2 Various changes have been suggested by representors which seek to add specific references to facilities, sites and services to the CSRIP. While I have considered all of these, I consider that many add little to the document in terms of soundness or clarity and I have not recommended that they be included.

5 Overall Conclusions

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

Roland Punshon

INSPECTOR

List of Abbreviations:

ADDPD – Allocations and Designations Development Plan Document
CCSPD – Climate Change Supplementary Planning Document
CSRIP – Core Strategy and Rural Issues Plan
DCPDPD – Development Control Policies Development Plan Document
DPD – Development Plan Document
EAPP Regulations - Environmental Assessment of Plans and Programmes Regulations 2004
EEP – East of England Plan
EERA – East of England Regional Assembly
GAKSC – Growth Area Key Service Centre
GTAA – Gypsy and Traveller Accommodation Assessment
KSC – Key Service Centre
LDD – Local Development Document
LDS – Local Development Scheme
LTP – Local Transport Plan
PPS – Planning Policy Statement
RPG – Regional Planning Guidance
RSS – Regional Spatial Strategy
SCI – Statement of Community Involvement
SoS – Secretary of State
SPA – Settlement Policy Area
SPD - Supplementary Planning Document
S-RS – Sub-Regional Study

Bedford Borough Council Core Strategy and Rural Issues Plan – Inspector’s Report

Annexe A

Table of Recommended Changes

Ref. No.	CS RIP policy or paragraph	Report paragraph	Recommended change
Changes Proposed by the Council (Advertised) Dec 2006 and May 2007			
PEC1	Policy CP5	3.72	In ‘Search sequence for employment development’ add the following sentence at the end of Step 1: ‘In the case of office development the town centre will be the preferred location.’
PEC2	Paragraph 4.20	3.72	Delete the following text from the penultimate sentence of the paragraph: ‘office provision in the town centre;’ Insert the following sentence before the final sentence of the paragraph: ‘In accordance with national planning guidance the town centre will be the preferred location for office provision. See also Policy CP20’
PEC3	Policy CP11	3.19, 3.68, 3.69	See PC52 below
PEC4	Policy CP11	3.19, 3.68, 3.69	See PC52 below
PEC5	Policy CP11	3.26, 3.19, 3.69, 3.70	See PC52 below
PEC6	Paragraph 4.40	3.26	See IC11 below
PEC7	Policy CP11	3.19, 3.68, 3.69	See PC52 below
PEC8	Figure 2	3.26, 3.53	See PC36 below and Annexe C
PEC9	Paragraph 4.17	3.26, 3.53	See PC40 below
PEC10	Paragraph 4.18	3.29	See PC41 below
PEC11	Paragraph 4.22	3.29	See PC43 below
PEC12	Paragraph 4.35	3.84	Delete the following text from the end of paragraph 4.35: ‘- however there are also important sites at Wyboston, Thurleigh Airfield and Colworth House, Sharnbrook’.
PEC13	Paragraph 4.38	3.26, 3.70	See IC10 and IC20 below
PEC14	Paragraph 4.40	3.26, 3.70	See IC11 below
PEC15	Paragraph 4.39	3.26, 3.69	Delete paragraph 4.39 and replace by: ‘Since the Borough’s main business park (Priory Business Park) is now largely developed, the supply of high quality B1 office environments has become critical and, in addition to promoting redevelopment within the town centre (focused on the railway station), it is likely that the local planning authority will need to seek out one or two new strategic business sites. The focus for the allocation of quality B1 space will be the Growth Area in accordance with the search sequence set out in policy CP5.’

PEC16	Paragraph 4.53	3.61	See IC14 below.
PEC17	Paragraph 4.56	3.84	See PC66 below.
PEC18	Paragraph 4.63	3.72	Add the following new paragraph after paragraph 4.63 '4.63a PPS6 states that certain uses should be located as a preference within the town centre or, if there are no available sites, on the edge of the town centre before out of centre sites are considered. In the case of Policy CP20 the term 'town centre' in the second paragraph refers to the town centre boundary as defined on the Bedford Town Centre Area Action Plan Proposals Map.'
PEC19	Paragraph 4.66	3.72	Add the following text to the last bullet point in paragraph 4.66: 'The Town Centre Area Action Plan makes provision for 31,200 sq.m. of new retail floorspace on three key sites. The Council has not allocated land in the Town Centre Area Action Plan to meet all of the capacity identified in the 2005 Retail Study. Historically, Bedford has not attracted significant retail investment and, in light of this, it is not realistic to allocate land in the Town Centre Area Action Plan to meet all of the capacity identified. Therefore, the Council's strategy is to focus efforts on the delivery of these three key sites in the period up to 2011. After 2011, following retail development in the town centre, the Retail Study will be updated to review the amount of additional floorspace required to 2021. This will inform the timing of a review of the Town Centre Area Action Plan.'
PEC20	Paragraph 4.67	3.71	See PC68 below
PEC21	Appendix F Table 2	3.11, 3.53, 3.117	See PC78 below
PEC22	Appendix F Table 2	3.11, 3.53, 3.117	See PC78 below
PEC23	Appendix F Table 2	3.11, 3.53, 3.68, 3.117	See PC78 below
PEC24	Appendix F	3.53, 3.117	See IC20 below
Additional Change (Advertised) November 2007			
EC1	Paragraph 4.13	3.43	Insert new paragraph after paragraph 4.13: '4.13a The extent of the Growth Area is shown on the Key Diagram. Should the Council determine through monitoring that development delivery from the committed sites is likely to become exhausted and there be a need to make additional land allocations to meet Growth Area delivery targets through the plan-making process, the Council would seek sites by applying Policy CP5. In order to ensure that the most sustainable options were chosen, the Council may need to look beyond the extent of the Growth Area shown on the Key Diagram. If this became necessary, the Growth Area would be expanded to accommodate those sites.'
Additional Changes Proposed by the Council During the Hearing Sessions (Not Advertised)			
PC25	Page 4 2 nd bullet	3.62	See IC2 below
PC26	Paragraph 1.3	3.27	See IC3
PC27	Paragraph 1.8	2.2, 3.29	Add the following paragraph of text after the table in paragraph 1.8: '1.8a The documents referred to in the table above were included in the Council's first Local Development Scheme. The revised Local Development Scheme (September 2007) includes an Allocations and Designations DPD, to be commenced in 2007. The Allocations and Designations DPD will allocate land required for future development in the Borough up to 2021. It will designate areas where particular controls on development will apply and review the boundary of Settlement

			Policy Areas and the urban area.'																														
PC28	Paragraph 3.6	3.5	See IC4 below																														
PC29	Paragraph 3.9	2.16, 3.53	Delete Objective 1 and replace by: 'Deliver the planned growth in Bedford, Kempston and the northern Marston Vale (Local Plan 2002 commitments - see Figure 2) to achieve a step change in the Borough's role in the region.'																														
PC30	Paragraph 3.9	2.16	Delete the words 'if required' from Objective 3																														
PC31	Paragraph 3.9	2.16, 3.12	Delete Objective 14 and replace by: 'Protect and enhance the Borough's built, cultural and community assets and the character of settlements and foster the development of the Borough as a destination for heritage and cultural tourism'																														
PC32	Paragraph 3.9	2.16	Delete Objective 15 and replace by: 'Protect the environment by minimising the risk of flooding and the effects of climate change and facilitating improvements in air quality.'																														
PC33	Paragraph 4.6	3.67	Add the following text at the end of paragraph 4.6: 'However, it is important to note that the requirement for new jobs will be monitored borough-wide. No regional or sub-regional figures are available for the two discrete policy areas though, in line with regional and sub-regional strategies, the Growth Area will be the focus for new employment provision.'																														
PC34	Paragraph 4.6	3.19	<div>Add the following paragraph of text after paragraph 4.6: '4.6a For the purposes of this plan two policy areas are defined; the Bedford Growth Area and the Rural Policy Area (see para 4.6). The Rural Policy Area is the area not covered by the Bedford, Kempston and the northern Marston Vale Growth Area. The Growth Area and Rural Policy Area are shown on the Key Diagram.</div> <div>The following table shows which policies in the plan relate to both the Growth Area and the Rural Policy Area, and which policies do not.</div> <table><tr><th>Policy</th><th>Applies to the Growth Area</th><th>Applies to the Rural Policy Area</th></tr><tr><td>CP1 and CP2</td><td>✓</td><td>✓</td></tr><tr><td>CP3 to CP6</td><td>✓</td><td>X</td></tr><tr><td>CP7 to CP11</td><td>✓</td><td>✓</td></tr><tr><td>CP12 and CP13</td><td>✓</td><td>✓</td></tr><tr><td>CP14</td><td>X</td><td>✓</td></tr><tr><td>CP15</td><td>✓</td><td>✓</td></tr><tr><td>CP16 and CP17</td><td>X</td><td>✓</td></tr><tr><td>CP18 and CP19</td><td>✓</td><td>✓</td></tr><tr><td>CP20 to CP32</td><td>✓</td><td>✓</td></tr></table>	Policy	Applies to the Growth Area	Applies to the Rural Policy Area	CP1 and CP2	✓	✓	CP3 to CP6	✓	X	CP7 to CP11	✓	✓	CP12 and CP13	✓	✓	CP14	X	✓	CP15	✓	✓	CP16 and CP17	X	✓	CP18 and CP19	✓	✓	CP20 to CP32	✓	✓
Policy	Applies to the Growth Area	Applies to the Rural Policy Area																															
CP1 and CP2	✓	✓																															
CP3 to CP6	✓	X																															
CP7 to CP11	✓	✓																															
CP12 and CP13	✓	✓																															
CP14	X	✓																															
CP15	✓	✓																															
CP16 and CP17	X	✓																															
CP18 and CP19	✓	✓																															
CP20 to CP32	✓	✓																															
PC35	Paragraph 4.8	3.28	Delete paragraph 4.8 and replace by: '4.8 In spatial terms, this means dramatically expanding the local economy to encourage population growth through in-migration and thereby growing the housing market. Housing and employment growth will be concentrated in the Bedford, Kempston and northern Marston Vale Growth Area. This includes development of a new settlement, the Wixams, and new strategic employment site(s) to provide quality employment accommodation. New development will be accompanied by improved transport infrastructure including a new Wixams rail station, bypasses and park and ride services. The countryside and smaller villages in the borough will continue to be viable areas for business and leisure. The provision of affordable housing will be a priority in the Borough. The role of the Bedford town centre will be strengthened so that it becomes a place where more people choose to live and shop. This will include new shopping facilities, tourism and cultural provision, improved public transport interchanges and living accommodation. The borough																														

			will seek to provide a quality environment. The Council will seek to minimise pollution and the effects of climate change from new developments. Specific environmental measures include the provision of green infrastructure and continued support for the Forest of Marston Vale.'
PC36	Fig 2	3.26, 3.71	Recommended changes to Figure 2 are shown in Annex C to this Report
PC37	Paragraph 4.14	3.45	See IC5 below
PC38	Paragraph 4.14	3.45	See IC5 below
PC39	Paragraph 4.15	3.29	Delete 'an appropriate Development Plan Document' and replace by 'the Allocations and Designations DPD'
PC40	Paragraph 4.17	3.26, 3.53	See IC7 below
PC41	Paragraph 4.18	3.29	Insert additional paragraph after paragraph 4.18: 4.18a Monitoring of the delivery of housing within the growth area will be undertaken (see Appendix F) and could trigger a review of the Allocations and Designations Development Plan Document (DPD). Policy CP5 will provide the necessary search sequence and guidance to identify sites for housing in such a DPD.'
PC42	Policy CP5	3.44	Insert the following sentence above 'Search sequence for residential development': 'The Council will look to allocate sites for development using the steps below in the order shown.'
PC43	Paragraph 4.22	3.29, 3.58	Add the following text at the end of paragraph 4.22: 'Monitoring data for the period 2001-2004/05 shows that there has been an under-delivery of housing to meet the requirement (an average of 438 dwellings per annum). Dwelling completions for the remaining 16 year plan period will need to average 907 per annum to meet the requirement by 2021. At 31-3-2005 there was a supply of over 12,157 dwellings in the growth area. The delivery of housing in the growth area is expected to accelerate through the remainder of the plan period (see Appendix F for further details). The preparation of an Allocations and Designations DPD is to be commenced in 2007. This will provide flexibility in supply of housing land.'
PC44	Policy CP7	3.19	Add the following sentence as a separate paragraph at the end of the policy: 'This policy also applies outside the Growth Area.'
PC45	Policy CP8	3.19	Add the following sentence as a separate paragraph at the end of the policy: 'This policy also applies outside the Growth Area.'
PC46	Paragraph 4.31	3.104	See IC9 below
PC47	Paragraph 4.32	3.104	See IC9 below
PC48	Policy CP9	3.19, 3.104	See IC9 below
PC49	Policy CP9	3.104	See IC9 below
PC50	Paragraph 4.41	3.70	Add the following text at the end of paragraph 4.41: 'The criteria for assessing the merits of such sites will be set out in the Allocations and Designation DPD.'
PC51	Policy CP10	3.19	Add the following sentence as a separate paragraph at the end of the policy: 'This policy also applies outside the Growth Area.'
PC52	Policy CP11	3.19, 3.69, 3.70	Delete Policy CP11 and replace by: 'POLICY CP11 – EMPLOYMENT LAND Up to 75 hectares of additional employment land will be provided in the period 2001-2021. In such allocations the emphasis will be on creating new B1 environments providing a range of quality development opportunities to encourage the development of high value knowledge-based industries and smaller units in both urban and rural areas. The Council will allocate sites specific to the B1, B2 and B8 Use Classes to achieve a mix and range of sites and a balanced economy. The preferred location for strategic employment sites will be the Growth Area in accordance with CP5. Land allocated for employment and existing employment sites will only be considered for alternative uses where its

			retention is unnecessary and specific community and environmental benefits can be demonstrated and achieved. This policy also applies outside the Growth Area.'
PC53	Paragraph 4.45	3.19, 3.80	Delete paragraph 4.45 and replace by: '4.45 For the purposes of this plan two policy areas are defined; the Bedford Growth Area and the Rural Policy Area (see para 4.6). The Rural Policy Area is the area not covered by the Bedford, Kempston and the northern Marston Vale Growth Area. The Growth Area and Rural Policy Area are shown on the Key Diagram.'
PC54	Paragraph 4.46	3.19, 3.80	Delete paragraph 4.46 and replace by: 4.46 The primary purpose of this section is to set out the policies for the Rural Policy Area in particular the location of development and the amount of housing development required in the plan period. It should be noted however, that land outside the defined settlement policy areas of key service centres within the Growth Area is treated as open countryside in policy terms and policies CP12, CP13, CP15, CP18 and CP19 apply to it. In addition, there are five policies within the Growth Area chapter of the plan which include borough wide policies and which apply both in the Growth and Rural Policy Areas. These are policies CP7, CP8, CP9, CP10 and CP11.'
PC55	Paragraph 4.47	3.80	See IC12 below
PC56	Paragraph 4.48	3.29, 3.44	See PC57 below
PC57	Paragraph 4.48	3.29, 3.45	Delete paragraph 4.48 and replace by: '4.48 SPA boundaries are defined in the adopted Local Plan 2002 and are shown on the Proposals Map insets. SPA boundaries are to be re-assessed, where required, as part of the Allocations and Designations DPD'
PC58	Policy CP12	3.19	Add the following sentence as a separate paragraph at the end of the policy: 'This policy also applies in the Growth Area.'
PC59	Policy CP13	3.81	See PC62 below
PC60	Policy CP13	3.81	See PC62 below
PC61	Policy CP15	3.81	See PC62 below
PC62	Policy CP15	3.19, 3.85	Delete Policies CP13 and CP15 and replace by: 'CP13 - The COUNTRYSIDE AND DEVELOPMENT WITHIN IT All land outside the Settlement Policy Areas is defined as countryside. Development in the countryside will only be permitted if it would be consistent with national policy, particularly that in PPS7: Planning and the Countryside. This policy also applies in the Growth Area.'
PC63	Paragraph 4.54	3.19	Delete 'To improve the provision of affordable housing in the rural areas, the council will use the following methods: -' and replace by: 'To improve the provision of affordable housing in the rural areas (including the rural areas within both the Rural Policy Area and the Growth Area), the council will use the following methods: -'
PC64	Policy CP18	3.19	See PC65 below
PC65	Policy CP18	3.19, 3.86	Delete the final sentence of Policy CP18 and replace by: 'The provision of affordable housing to meet local needs may also be encouraged by the allocation of exception site(s) for 100% affordable housing. This policy also applies in the Growth Area.'
PC66	Paragraph 4.56	3.84	Delete paragraph 4.56 and replace by: '4.56 The job target for the borough is set out in policy CP10. The locational requirements of employment development will mean that the majority of new jobs and business activity will be focused on the urban area and thus within the Growth Area rather than the Rural Policy Area. However, it is to be expected that some economic development will occur focused on key service centres and associated with existing employment locations such as those at Wyboston on the edge

			of the St Neots urban area, Colworth House Sharnbrook and at Thurleigh Airfield and more generally as farms continue to diversify and redundant agricultural buildings are converted for business use. This approach is consistent with PPS7. Development at existing employment sites in the countryside is addressed in saved policies and will be further addressed in a Development Control Policies DPD.'
PC67	Policy CP19	3.19	Add the following sentence as a separate paragraph at the end of the policy: 'This policy also applies in the Growth Area.'
PC68	Paragraph 4.67	3.72	Delete paragraph 4.67 and replace by: '4.67 The Retail Study of 2005 confirms that Bedford town centre should remain the main focus of retailing in the borough. In order to maintain and enhance its role, it is important that the primary shopping area of the town centre continues to be the preferred location for new large-scale development. The Primary Shopping Area is defined in the Town Centre Area Action Plan. If monitoring indicates that the identified retail floorspace of the three key sites allocated in the Town Centre Area Action Plan is not likely to be delivered, this will trigger an updated retail capacity study to consider the reasons for this, to review the amount of additional floorspace likely to be needed and to consider the scope for expansion of the Primary Shopping Area. This would take place within the context of a review of the Town Centre Area Action Plan. To do so earlier would compromise the present strategy of delivering the three key sites which are vital to the successful regeneration of Bedford town centre.'
PC69	Paragraph 4.76	3.99	Replace 'groundwater' by 'water'.
PC70	Policy CP22	3.99	See IC16 below
PC71	Paragraph 4.81	3.33	In the second bullet point of paragraph 4.81 replace 'greenspace strategy' by 'Greenspace Strategy'.
PC72	Policy CP23	3.33	In the third paragraph replace 'greenspace strategy' by 'Greenspace Strategy'
PC73	Paragraph 4.101	3.111	Add the following text to the end of paragraph 4.101: 'The transport schemes in policies CP28 and CP29 are all included in the LTP 2006/07-10/11, see Appendix F table 1 for further details.'
PC74	Appendix A	3.47	Recommended changes to the Key Diagram are shown in Annexe D to this Report
PC75	Appendix C	3.27	Insert the following text before the Table in Appendix C: 'Local Plan policies were initially 'saved' until the 27 th September 2007. On the 18 th September 2007, the Council received a Direction from the Secretary of State to extend the 'saved' period. Not all Local Plan policies were included in the 'saved' list. Policies S8, NE1, NE2, NE5, NE15, NE25, NE26, NE27, NE28, NE29, BE10, BE12, BE14, BE17, BE33, H4, H15, H16, H17, H19, H20, H21, H22, H35, H36, E3, E7, SH1 and TC2 of the Local Plan are not saved beyond 27 th September 2007.' Amend the Table in Appendix C by the deletion of reference to 'Policy H35 Gypsy sites H36 Winter quarters for travelling showpeople' from the final column of the row beginning CP9.
PC76	Appendix E	3.19	See IC19 below
PC77	Appendix F Table 1	2.18, 3.111, 3.112, 3.117	Delete Table 1. Recommended changes to Table 1 in Appendix F are shown in Annex E to this Report.
PC78	Appendix F Table 2	3.11, 3.68, 3.117	Delete Table 2. Recommended changes to Table 2 in Appendix F are shown in Annex E to this Report.
PC79	Appendix F	3.117	See IC20 below
Additional changes made by the Inspector			
IC1	Whole plan	3.16	Replace the term 'the rural area' where it is being employed to describe the area outside the Growth Area by the term 'the Rural Policy Area' Replace the term 'growth area' by 'Growth Area'.
IC2	Page 3 11 th	3.62	Delete 'the rural areas' and replace by 'villages having a population of less than 3,000'

	bullet		
IC3	Paragraph 1.3	3.27	Delete paragraph 1.3 and replace by: '1.3 Whilst the Bedford Development Framework is being produced, the adopted Local Plan is 'saved'. As of the 27 th September 2007, some Local Plan policies ceased to be 'saved'. See Appendix C for details. The remaining 'saved' policies in the Local Plan will not be replaced all at once, as the Bedford Development Framework will be a series of separate documents. Thus, as each document is produced, different Local Plan policies will be replaced. Eventually, all the policies of the Local Plan will be replaced by other Development Plan Documents. Planning decisions will continue to be made in accordance with saved Local Plan policies until such time as they are replaced.'
IC4	Paragraph 3.6	3.6	Delete paragraph 3.6 and replace by: '3.6 Regional policy sets the context for development in the region as a whole. The vision and policies of this plan should be in general conformity with regional policy. Regional policy is set out in the Regional Spatial Strategy (RSS). At the time of submission of this plan to the Secretary of State, the RSS was made up of Regional Planning Guidance for the South East (RPG9) together with a partial review of that document, the Milton Keynes and South Midlands Sub-Regional Strategy. 3.6a At the time of submission a review of the RSS, the draft East of England Plan, was nearing completion. While it will replace RPG9, the EEP makes clear that it will not replace the S-RS. The EEP and the S-RS will 'run alongside' one another until such time as the EEP is reviewed, estimated at late 2011. At that time the 2 strands of strategy will be merged into a single document. Until they are merged, the EEP will provide the spatial strategy and generic policies for the borough as a whole whilst the S-RS will provide a more detailed strategic framework for that part of the borough identified as being within the Bedford/Kempston and North Marston Vale Growth Area.'
IC5	Paragraph 4.14	3.46	Delete paragraph 4.14 and replace by: 'In this context, Policy CP3 focuses development within the Growth Area on the urban area (including the town centre) and Growth Area key service centres. The Council's 2002 Local Plan established the urban area boundary as a policy tool. The urban area boundary marks the outer limit of the expansion of Bedford and Kempston. The urban area boundary is shown on the Local Plan Proposals Map. Whilst not within the boundary, the settlement of Shortstown which immediately adjoins the urban area, is considered in policy terms to be urban. The Shortstown Development Brief 2003 proposes a development limit for the settlement which will be further considered through the Allocations and Designations DPD. In the interim period before the adoption of the Allocations and Designations DPD, the Development Brief boundary will be treated as the SPA boundary for Shortstown.'
IC6	Paragraph 4.15	3.45	Insert the following sentence before the last sentence of paragraph 4.15: 'SPA boundaries in the Growth Area are defined in the adopted Local Plan 2002 and are shown on the Proposals Map insets. SPA boundaries are to be re-assessed, where required, as part of the Allocations and Designations DPD'
IC7	Paragraph 4.17	3.26, 3.29, 3.53	Delete paragraph 4.17 and replace by: '4.17 The sequential approach set out below in Policy CP5 will be used to provide a framework for any additional allocations which may need to be made (through the Allocations and Designations DPD) in the plan period. The MKSM sub-regional strategy sets the sub-regional housing requirement and clearly endorses the development of housing on committed sites from the Local Plan 2002 to meet the requirement. At 31-3-2007, 10,061 of the required 16,270 dwellings had been completed or had been granted planning permission. A further 3,375 were subject to resolutions to grant planning permission subject to the completion of Section 106 agreements. The current position of housing supply is shown in Appendix F. The Council considers that, with the current reliance on 'windfall' development, the total 16,270 dwellings can be developed without the need for further allocations. However, to enable the policy to be responsive to changes in circumstances and to bring the strategy into line with national guidance on 'windfall' sites, Policy CP5 provides a search sequence for housing allocations.'
IC8	Paragraph 4.28	3.62	Delete paragraph 4.28 and replace by:

			<p>'4.28 National guidance on affordable housing is set out in PPS3: Housing. The guidance states that national indicative minimum site size threshold above which an element of affordable housing can be required is 15 dwellings. Lower minimum thresholds can be set where practicable and viable including in rural areas.'</p>
IC9	Paragraphs 4.31, 4.32 and Policy CP9	3.19, 3.104, 3.105, 3.107	<p>Delete paragraphs 4.31 and 4.32 and Policy CP9 and replace by:</p> <p>'4.31 Local authorities are required to carry out gypsy and traveller accommodation assessments (GTAA's) to inform the preparation of development plan documents. A sub-regional Gypsy and Traveller Accommodation Assessment (GTAA) was completed in 2007. Government guidance also states that Regional Spatial Strategies must specify pitch requirements for each local planning authority area based on local accommodation assessments (GTAA's). The East of England Regional Assembly is currently carrying out a single issue RSS review to address the provision of Gypsy and Traveller sites to which the sub regional GTAA will provide background evidence.</p> <p>4.32 Where a need has been identified through the RSS (or, in advance of this, through a GTAA) for the provision of additional gypsy and traveller sites, such sites should be located in general accordance with Policies CP3 and CP14. In principle a sequential approach will be followed to identify any necessary allocations as part of the Allocations and Designations DPD process. However, it is recognised that land which is available and affordable within the urban area and within SPAs for these purposes is likely to be limited and, given the working patterns of some Gypsies and Travellers, may not be suitable to meet their needs. In these circumstances, countryside locations may also need to be considered.</p> <p>4.32a Proposals for sites for travelling showpeople will be assessed against the Policy CP9 criteria. Their specific needs have not been assessed through the GTAA and their need for sites will, therefore, be addressed separately in accordance with the advice in Circular 04/2007: Planning for Travelling Showpeople.</p> <p>Policy CP9 ACCOMMODATION FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE</p> <p>Where a need has been identified through the RSS (or, in advance of this, through a GTAA) for the provision of additional accommodation for Gypsies and Travellers, sites will be allocated and planning permission will be granted within or adjoining the urban area or SPAs or, where no such sites are reasonably available or suitable for the use, in the countryside, provided that in relation to all locations, the following requirements are clearly satisfied:</p> <ul style="list-style-type: none"> i) Submission of evidence to justify local need for the scale and nature of the accommodation proposed; and ii) Satisfactory vehicular access from the public highway; and iii) Siting and landscaping ensure that any impact upon the character and appearance of the locality is minimised, including impacts on biodiversity and nature conservation. In areas of nationally recognised designations planning permission will only be granted where the objectives of designation would not be compromised by the development; and iv) The amenities of the occupiers of nearby land and property would not be harmed by the development in an unacceptable manner; and v) Adequate schools, shops and other community facilities are within reasonable travelling distance and preferably can be reached by foot, cycle or public transport; and vi) The scale of the site or the number of pitches would not be sufficient to dominate the nearest settled community and would not place undue pressure on local infrastructure; and vii) The site would not be located in an area at high risk of flooding, including functional floodplain. <p>This policy also applies outside of the Growth Area.'</p>
IC10	Paragraph 4.38	3.26, 3.71	<p>After paragraph 4.38 insert the following paragraph:</p> <p>'4.38a Details of the supply of employment land are shown in Appendix F and will be regularly updated through the Annual Monitoring Report.'</p>
IC11	Paragraph 4.40	3.26, 3.70	Delete paragraph 4.40 and replace by:

			<p>'The council commissioned a review of employment land in the borough (2005) in accordance with guidance issued by the government. The findings of the study support the need for an additional 75ha of quality B1 office space (during the period 2001 – 2021) and forecast a decline in the B2 and B8 sectors. Information on the supply of land for employment purposes is set out in Appendix F. Table 4 in Appendix F shows a potential supply of about 54ha of B1 land, leaving in the region of 21ha to be identified (up to 30ha if some existing permissions are discounted) in an Allocations and Designations DPD. Whilst the expectation is for B2 and B8 sectors to decline to 2021, recent monitoring shows that the borough is still experiencing some B2 and B8 growth. It is expected that the re-use of existing B2 and B8 sites along with the land supply shown in Table 4 will cater for B2 and B8 demand during this period'</p>
IC12	Paragraph 4.47	3.80	<p>Delete 'They promote the sustainability of the rural areas and communities by:' and replace by: 'They promote the sustainability of the countryside and rural communities by:'</p>
IC13	Policy CP14	3.82	<p>Delete Policy CP14 and replace by:</p> <p>'POLICY CP14 – LOCATION OF DEVELOPMENT IN THE RURAL POLICY AREA</p> <p>In circumstances where there is a proven need for development to be located in the Rural Policy Area, most new development will be focused in or around the edge of Key Service Centres where employment, housing (including affordable housing), services and other facilities can be provided close together.</p> <p>In rural settlements defined by a Settlement Policy Area boundary which are not designated as Key Service Centres, such development will be restricted to that which is required to meet local business and community needs and to maintain the vitality of those communities.'</p>
IC14	Paragraph 4.53	3.61	<p>Delete paragraph 4.53 and replace by:</p> <p>'4.53 The scale of housing development in the Rural Policy Area is defined in the draft East of England Plan which proposes 1300 dwellings in the period 2001-2021. The Council's housing monitoring indicates that, at 31/3/2007, completions and planning permissions in the borough outside the Growth Area had already reached 1348. Monitoring data shows that completion rates have exceeded requirements in the early years of the plan period. Completion rates at this level are not expected to continue in the rural area throughout the plan period (see Appendix F for further details).'</p>
IC15	Policy CP17	3.9	<p>Replace '1250' by '1300' in the first bullet point.</p>
IC16	Policy CP22	3.96, 4.1	<p>Delete iv) and replace by:</p> <p>'iv) preserve and, where appropriate, enhance conservation areas, scheduled ancient monuments and other important archaeological remains, and listed buildings and their settings; and,'</p> <p>In the first bullet point of vii) replace 'groundwater' by 'water'.</p>
IC17	Policy CP27	3.96, 3.97	<p>After paragraph 4.96 insert the following paragraph:</p> <p>'Policy CP27 iv) below sets out requirements which are, in part, derived from Policy ENG1 of the emerging East of England Plan. These requirements will be employed flexibly to guide development until the viability of more locally-specific policies can be assessed. This will be pursued as a matter of urgency in more detailed Development Plan Documents.'</p> <p>Delete parts iv) and v) from Policy CP27 and replace by:</p> <p>'iv) Unless it can be demonstrated that - having regard to the type of development involved and its design - these requirements are not feasible or viable, achieve a minimum 10% reduction in carbon emissions (below the normal requirement set by the Buildings Regulations) in all new residential developments and above a threshold of 500m2 in new non-residential developments by measures which shall include, in new developments above a threshold of 1000m2 or 50 dwellings, the supply of at least 10% of the energy consumed in the new development to be provided from decentralised and renewable or low-carbon energy sources.</p> <p>v) As a minimum, meet the national standards for building performance set by the current Building Regulations. Through the Allocations and Designations DPD process the Council may identify local development or site specific opportunities</p>

			which justify the adoption and application of higher standards of building performance as set out in the Code for Sustainable Homes. Such higher standards may also be required by the Council where justified by changes in national guidance.'
IC18	Appendix D	3.5	<p>Delete paragraphs D1-D7 and replace by:</p> <p>'D.1 The Draft East of England Plan was published in December 2004; it was a draft revision to the existing Regional Spatial Strategy*. Following the publication of the draft, the East of England Regional Assembly withdrew its endorsement of the plan principally due to concerns about infrastructure delivery. EERA remains committed to the policy content of the plan, subject to the infrastructure being provided to sustain the level of growth proposed. The Examination in Public was held and the Report of the Panel was published in June 2006. The Proposed Changes to the East of England Plan were then published in December 2006. The publication of the RSS was expected in mid 2007 but has been delayed as the Government Office for the East of England announced in June 2007 that it had commissioned further work to assess the plan against the requirements of the European Habitats Directive. Once finalised, the plan will cross-refer to the relevant Milton Keynes & South Midlands Sub-Regional Strategy policies that affect the region.</p> <p>D.2 The plan contains planning policy for the whole of the East of England region, which incorporates the six counties of Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk and Suffolk and the unitary authorities of Luton, Peterborough, Southend and Thurrock.</p> <p>D.3 The plan takes account of European and national planning policy, in particular the Government's Sustainable Communities Plan of 2002 which identified four growth areas. Three of these growth areas are within the East of England region and thus are key aspects of the plan.</p> <p>D.4 The vision of the RSS (proposed Changes) document is 'By 2021 the East of England will be realising its economic potential and providing a high quality of life for its people, including by meeting their housing needs in sustainable and inclusive communities. At the same time it will reduce its impact on climate change and the environment, including through savings in energy and water use and by strengthening its stock of environmental assets.'</p> <p>D.5 The objectives of the plan are:</p> <p>i) To reduce the Region's impact on, and exposure to, the effects of climate change by:</p> <ul style="list-style-type: none"> • Locating development so as to reduce the need to travel; • Effecting a major shift in travel towards public transport, walking and cycling and away from car use; and • Maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; • Reducing the risk of damage from flooding. <p>ii) To increase housing opportunities for people in the region by:</p> <ul style="list-style-type: none"> • Securing a step change in the delivery of additional housing throughout the region, particularly the Key Centres for development and change; and • Giving priority to the provision of affordable housing to meet identified needs. <p>iii) To realise the economic potential of the region and its people by:</p>

			<ul style="list-style-type: none"> • Facilitating the development needed to support the region's business sectors and clusters, improving skills and widening opportunities in line with the Regional Economic Strategy; • Providing for job growth broadly matching increases in housing provision and improving alignment between the locations of workplaces and homes; • Maintaining and strengthening the region's inter-regional connections by improving connections to economic opportunities in London; and • Ensuring adequate and sustainable transport infrastructure. <p>iv) To improve the quality of life of the region's people by:</p> <ul style="list-style-type: none"> • Ensuring new development fulfils the principles of sustainable communities, providing a well designed living environment adequately supported by social and green infrastructure; • Promoting social cohesion by improving access to work, services and other facilities, especially for those who are disadvantaged; • Maintaining cultural diversity while addressing the distinctive needs of each part of the region; • Promoting regeneration and renewal of disadvantaged areas; • Increasing community involvement in the implementation of the strategy at the local level. <p>v) To improve and conserve the region's environment by:</p> <ul style="list-style-type: none"> • Ensuring the protection and enhancement of the region's environmental assets, including the built and historic environment, landscape and water; • Re-using previously-developed land and seeking environmental as well as development gains from the use of previously-undeveloped land; • Protecting and, where appropriate, enhancing biodiversity through the protection of habitats and species and through creating new habitats through development; • Providing a network of multi-function greenspace accessible to the region's people; and • Reducing the demand for and use of water and other renewable resources and reducing waste and increasing the sustainable management of waste. <p>D.6 The plan includes general policies for the region as a whole, policies relating to sub-regions and regional policies relating to specific topics. The East of England Plan (Proposed Changes) tells us:</p> <ul style="list-style-type: none"> • Bedford/Kempston and the northern Marston Vale is a Key Centre for Development and Change where new development will be focused (SS3). • Development in rural areas should be focused in market towns and thereafter in key service centres (SS4). • Bedford/Kempston is a priority area for regeneration (SS5). • Within the overall housing target, LDDs should set appropriate targets for affordable housing (H3). • Policies for Key Centres for Development and Change in Bedfordshire are contained in the Milton Keynes and
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			<p>South Midlands Sub-Regional Strategy.</p> <ul style="list-style-type: none"> • The indicative job growth target in Bedford and Mid Bedfordshire will be 27,000 jobs in the period 2001-2021 (E1). • Bedford is a Major town centre of strategic importance (E5). • Housing development in the Borough (outside of the Growth Area) will be 1300 dwellings in the period 2001-2021 (H1). • Bedford Borough is within the Bedfordshire Housing Strategy sub-region. • Bedford is a Regional Transport Node where improvements to inter-urban public transport should be focussed (T5). • The Plan states that the duelling of the A421 from Bedford to the M1 is currently programmed for delivery. • The Plan states that the Bedford Western bypass is currently programmed for delivery. • The Plan states that the Wixams railway station has been identified in the Regional Funding Allocation but not yet approved. • The Borough is mainly within the landscape character area of the Bedfordshire and Cambridgeshire claylands. • In the Borough new woodland creation should be targeted specifically at, inter alia, the Forest of Marston Vale Community Forest with the aim of increasing woodland cover to 30% by 2030 (ENV5). <p>D.7 The above bullet points are a summary of the key aspects of the plan as they relate to Bedford Borough; they do not represent a summary of the plan as a whole and do not cover every topic covered by the plan.</p> <p>D.7a Once the RSS has been finalised (see D.1 above), the RSS will be reviewed to cover the period to 2031. A Draft Revised RSS is anticipated by the end of 2009, with the final version to be published by late 2011.'</p>
IC19	Appendix E	3.19	<p>Add the following glossary terms to Appendix E:</p> <p>'Growth Area – The area of the Borough identified by the Milton Keynes and South Midlands Sub-Regional Strategy. The area is described as Bedford, Kempston and the northern Marston Vale and is shown on the Key Diagram.'</p> <p>'Rural Policy Area – The area of the Borough not covered by the Bedford, Kempston and the northern Marston Vale Growth Area. This area is shown on the Key Diagram.'</p>
IC20	Appendix F	3.26, 3.29, 3.53, 3.57, 3.59, 3.61, 3.71	<p>After Table 2 insert the following text and Tables:</p> <p>F.5 The information in this Appendix is taken from the Annual Monitoring Report and the Housing Monitoring Report. For up to date information please see the Annual Monitoring Report published each December.</p> <p>HOUSING <u>Bedford, Kempston and northern Marston Vale Growth Area</u></p> <p>F.6 The table below shows the dwelling supply in the growth area for the period 2005-2021.</p> <p>Table 3: Dwelling supply as at 31-3-2007</p>

Source of supply	Site	Number of housing units	Indicative split between field brown and Greenfield		Planning status at 31/3/07
			PdI	greenfield	
Completions 2001-06/07		2433	1627	806	Complete
Planning permissions at 31/3/07	Other sites	7628	3757	3871	Planning permission granted
Local plan commitments at 31/3/07	H2 Britannia Works Phase E	255	255		Application under consideration
	H2 Britannia Works Phase F	100	100		Estimated additional site capacity
	H8 Land north of Bromham Road	1200		1200	Resolution to grant planning permission subject to sec 106 agreement
	H9 land at Shortstown	130		130	Resolution to grant planning permission subject to sec 106 agreement
	H11 South of Fields Road Wootton	500		500	Resolution to grant planning permission subject to sec 106 agreement
	H12 North of Fields Road Wootton	580		580	Resolution to grant planning permission subject to sec 106 agreement
	H13 Stewartby	610		610	Resolution to grant planning permission subject to sec 106 agreement
Additional capacity estimate	Wixams	500		500	
Town centre Area Action Plan	TC7,10,11,13,15,16, 17 and other sites	635	635		
Other windfall commitments at 31/03/07	Small sites with resolution to grant	173	117	56	Resolution to grant planning permission subject to sec 106 agreement
Windfall allowance 2007/08-21*	125 p.a	1750			
Total supply and		16494			

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- has been caused by a combination of factors including:
- Changes in national housing policy which increased dwelling density on Local Plan allocated sites (over 300 more dwellings were delivered than were originally identified)
- The rapid delivery of dwellings on many Local Plan housing allocations in the rural area
- In the period from 2005/06 to 2021 there are a further 193 dwellings allocated for housing in the rural area through the Local Plan. Infill and affordable dwellings to meet local need are also expected (see policies CP14, 15, 17 and 18). Thus the requirement of 1,300 is not expected to be greatly exceeded and the over-delivery of the requirement at 31-3-2007 does not cause concern.

EMPLOYMENT LAND

F.10 The following table shows potential sources of employment land 2001-2021. In quantitative terms there appears to be a healthy supply of B1/B2/B8 land, but as the table notes explain, there is doubt about whether some of the sites will be delivered.

Table 4: Employment Land Supply

Potential Sources of Employment Land 2001-2021 A summary of 2006/07 monitoring data		
	All (B1, B2 & B8)	B1 (estimate)
Completions 2001-07	52.75 (net) 78.40 (gross)	13.5
Sites with planning permission		
Growth Area		
B1	2.55	2.55
B1/B8		
B2/B8	0.22	
B8	0.13	
B1/B2/B8	39.68	5.22
Total	42.58	7.77
Rural Policy Area		
B1	9.1	9.1
B1/B2	17.8	9
B1/B8	1.26	0.45
B2	0.21	
B8	0.2	
B1/B2/B8	7.59	3.02
Total	36.16	21.57
Sites with resolution to grant planning permission		
Growth Area		
Stewartby (B1/B2/B8)	2.4	1
Wootton (B1/B2/B8)	9	2

			Land north of Bromham Road (B1/B2)	4	2
			Total	15.4	5
			Sites without planning permission		
			Growth Area		
			E4 land west of B530	3.4	1
			E5 land east of B530	1.36	1
			H10 Elstow Brickworks	8	2
			TC13 Railway Station	2	2
			Total	14.76	6
			Overall Total	161.65 ha	53.84 ha
			<p>At 2007 planning permission had been granted for the loss of a further 2.87ha of employment land to uses outside the 'B' range. This reduces the overall total of 161.65ha to 158.78ha.</p> <p>It is unlikely that all sites with planning permission will come forward. For example:</p> <ul style="list-style-type: none"> Growth Area sites with planning permission include 12ha to the rear of the airship sheds at Cardington. Following the appeal decision on the former RAF site to the north (2005) this site is unlikely to be developed for employment because of access difficulties. Taking the 12ha from the 158.78ha total leaves 146.78ha. The estimated B1 figure takes account of the fact that this site is unlikely to be delivered. Rural Policy Area sites (sites outside the Bedford, Kempston and northern Marston Vale) with planning permission include a large site at Thurleigh Airfield. This was first granted planning permission in 2001 and its delivery is uncertain. Without the 18ha at Thurleigh Airfield, the 146.78ha total is reduced to 128.78ha. The B1 total includes an estimate of 9ha B1 at Thurleigh. Removing this from the B1 total leaves potential for 44.84ha. 		

Bedford Borough Council Core Strategy and Rural Issues Plan – Inspector’s Report

Annexe B

Table of Recommended Minor Changes

Ref. No.	CS RIP policy or paragraph	Report paragraph	Recommended change																															
CC1	Paragraph 2.14	4.1	Replace ‘seven’ by ‘eight’ in penultimate sentence																															
CC2	Policy CP2	4.1	Delete ‘drainage’ and replace by ‘water resource’ in part iii)																															
CC3	Paragraph 4.13	4.1	Delete ‘THE LOCATION OF DEVELOPMENT IN THE GROWTH AREA’ title and replace by ‘THE LOCATION OF DEVELOPMENT IN THE GROWTH AREA –see Key Diagram in Appendix A’																															
CC4	Paragraph 4.13	4.1	Delete ‘Figure 1’ and replace by ‘Figure 2’ in 2 nd bullet, sub-bullet 3.																															
CC5	Paragraph 4.76	3.99	At the end of paragraph 4.76 add the following sentence: ‘Policy CP27 deals in greater detail with issues of climate change and pollution.’																															
CC6	Appendix D	2.27	Add ‘and Community Plan’ to heading of Appendix D																															
CC7	Appendix D	2.27	Delete the Table contained in Appendix D and replace by: ‘Table to show how spatial issues of the Community Plan are incorporated into the Core Strategy <table><tr><th>Community Plan themes</th><th>Spatial Issue identified</th><th>CS RIP objective</th><th>CS RIP policies most relevant</th><th>Other future LDF policy</th></tr><tr><td rowspan="2">Promoting community safety</td><td>Designing out crime as a means of promoting community safety</td><td>10</td><td>CP2 CP22</td><td>DC policy in DC DPD and site specific guidance in A&D DPD</td></tr><tr><td>Reducing the fear of crime through support for CCTV</td><td>10</td><td>CP2 CP22</td><td>Town Centre AAP policies TC35 and TC40</td></tr><tr><td rowspan="3">Providing housing and building communities</td><td>Delivering new homes across the range of tenures</td><td>1,2,3,4</td><td>CP6 CP7 CP8 CP17 CP18</td><td>Town Centre AAP policy TC25. DC policy in DC DPD and site specific guidance in A&D DPD</td></tr><tr><td>Promoting balanced communities and housing markets</td><td>2,3,4,9</td><td>CP7</td><td>Town Centre AAP policy TC25. DC policy in DC DPD and site specific guidance in A&D DPD</td></tr><tr><td>Meeting housing needs including special needs</td><td>1,3,4,9</td><td>CP6 CP7 CP8 CP17 CP18</td><td>Town Centre AAP policy TC25. DC policy in DC DPD and site specific guidance in A&D DPD</td></tr></table>					Community Plan themes	Spatial Issue identified	CS RIP objective	CS RIP policies most relevant	Other future LDF policy	Promoting community safety	Designing out crime as a means of promoting community safety	10	CP2 CP22	DC policy in DC DPD and site specific guidance in A&D DPD	Reducing the fear of crime through support for CCTV	10	CP2 CP22	Town Centre AAP policies TC35 and TC40	Providing housing and building communities	Delivering new homes across the range of tenures	1,2,3,4	CP6 CP7 CP8 CP17 CP18	Town Centre AAP policy TC25. DC policy in DC DPD and site specific guidance in A&D DPD	Promoting balanced communities and housing markets	2,3,4,9	CP7	Town Centre AAP policy TC25. DC policy in DC DPD and site specific guidance in A&D DPD	Meeting housing needs including special needs	1,3,4,9	CP6 CP7 CP8 CP17 CP18	Town Centre AAP policy TC25. DC policy in DC DPD and site specific guidance in A&D DPD
Community Plan themes	Spatial Issue identified	CS RIP objective	CS RIP policies most relevant	Other future LDF policy																														
Promoting community safety	Designing out crime as a means of promoting community safety	10	CP2 CP22	DC policy in DC DPD and site specific guidance in A&D DPD																														
	Reducing the fear of crime through support for CCTV	10	CP2 CP22	Town Centre AAP policies TC35 and TC40																														
Providing housing and building communities	Delivering new homes across the range of tenures	1,2,3,4	CP6 CP7 CP8 CP17 CP18	Town Centre AAP policy TC25. DC policy in DC DPD and site specific guidance in A&D DPD																														
	Promoting balanced communities and housing markets	2,3,4,9	CP7	Town Centre AAP policy TC25. DC policy in DC DPD and site specific guidance in A&D DPD																														
	Meeting housing needs including special needs	1,3,4,9	CP6 CP7 CP8 CP17 CP18	Town Centre AAP policy TC25. DC policy in DC DPD and site specific guidance in A&D DPD																														

				Maintaining the quality of existing residential areas	10	CP2 CP22	Town Centre AAP policy TC39. DC policy in DC DPD and site specific guidance in A&D DPD
				Utilising empty homes	4	CP2	Town Centre AAP policy TC26. DC policy in DC DPD and site specific guidance in A&D DPD
				Keeping jobs and homes in balance	1,2,3	CP32	DC policy in DC DPD and site specific guidance in A&D DPD
				Building in high standards of design and energy efficiency	10, 12, 15	CP2 CP22 CP27	Town Centre AAP policies TC36, TC339 and TC41. DC policy in DC DPD, site specific guidance in A&D DPD and Climate Change SPD
				Ensuring that infrastructure is available to meet the needs of new communities	7,13	CP1 CP11 CP20 CP23 CP28 CP29 CP30 CP31 CP32	Town Centre AAP policies TC18-24 and TC36. DC policy in DC DPD, site specific guidance in A&D DPD
			Improving the environment	Involving the community in improving the environment	16	CP20 CP22 CP23 CP24 CP25 CP26	Adopted SCI May 2006. Consultation Statement CSRIP and Town Centre AAP
				Ensuring that new development is based on sustainable principles	2,9	CP2 CP5 CP14 CP15 CP21 CP27 CP30 CP32	Town Centre AAP strategic policy and site specific policies. DC policy in DC DPD, site specific guidance in A&D DPD
				Creating a network of green spaces	11	CP23 CP25 CP26	Town Centre AAP policy TC31. DC policy in DC DPD, site specific guidance in A&D DPD and Development Briefs for Local Plan housing allocations
				Protecting the heritage and cultural value of the built environment	14	CP24	Town Centre AAP policies TC9-10 and TC27. DC policy in DC DPD, site specific guidance in A&D DPD
				Protecting the natural	11,15	CP23	Town Centre AAP policies TC31 and

				environment, biodiversity and landscape		CP24 CP25 CP26	TC36. DC policy in DC DPD, site specific guidance in A&D DPD	
			Improving health	Supporting the development of local health services including GP surgeries	13	CP31 CP32	Town Centre AAP policy TC40?? DC policy in DC DPD, site specific guidance in A&D DPD	
			Strengthening the economy	Bringing forward sites to encourage companies to locate in Bedford	1,3,6	CP10 CP11 CP19 CP32	Town Centre AAP site specific policies. DC policy in DC DPD, site specific guidance in A&D DPD	
				Supporting tourism related activities	14	CP20	Town Centre AAP strategic policy and TC28. DC policy in DC DPD.	
				Delivering infrastructure to support the government growth agenda	2,8,13	CP20 CP28 CP29 CP31 CP32	Town Centre AAP policies TC18-24 and TC40. DC policy in DC DPD, site specific guidance in A&D DPD and Development Briefs for Local Plan housing allocations	
				Improving connections to the strategic transport networks and reducing peak hour congestion in the urban area	8	CP20 CP28 CP29 CP31 CP32	Town Centre AAP policies TC18-24 and TC40. DC policy in DC DPD, site specific guidance in A&D DPD	
			Developing learning opportunities and skills	Supporting access to education, training, and employment	1,13	CP31	Town Centre AAP policies TC2, TC5-6 and TC14. DC policy in DC DPD, site specific guidance in A&D DPD	
			Creating better transport	Creating better, more sustainable integrated transport networks for the Borough of Bedford	8,13	CP20 CP28 CP29 CP30 CP31	Town Centre AAP policies TC18-24 and TC40. DC policy in DC DPD, site specific guidance in A&D DPD	
				Improve transport networks for the Borough of Bedford	8,13	CP20 CP28 CP29 CP30 CP31	Town Centre AAP policies TC18-24 and TC40. DC policy in DC DPD, site specific guidance in A&D DPD	
				Improve transport networks for cars, bus, rail, cycle and walking	8,13	CP20 CP28 CP29 CP30 CP31	Town Centre AAP policies TC18-24 and TC40. DC policy in DC DPD, site specific guidance in A&D DPD	
				Provide park and ride	8,13	CP29	Town Centre AAP policies TC18-24 and TC40. DC policy in DC DPD, site	

						specific guidance in A&D DPD	
		Promoting leisure	Support leisure and cultural development	7,13,14	CP20 CP24	Town Centre AAP policies TC9-10. DC policy in DC DPD, site specific guidance in A&D DPD	
			Providing an infrastructure for leisure which in turn helps foster a sense of community	13	CP20	Town Centre AAP policies TC9-10. DC policy in DC DPD, site specific guidance in A&D DPD	
		Including everyone	Creating mixed and balanced sustainable communities	2,4	CP2 CP7 CP19 CP32	Town Centre AAP policy TC25. DC policy in DC DPD, site specific guidance in A&D DPD	
			Providing the basis for a diverse economy	3,5	CP10 CP11 CP19	Town Centre AAP policies TC2, TC5-6 and TC7-17. DC policy in DC DPD, site specific guidance in A&D DPD	
			Providing infrastructure to enable all people to take their place in the community	13 16	CP31	Town Centre AAP proposals. DC policy in DC DPD, site specific guidance in A&D DPD	
			Consulting widely	16	CP32	Adopted SCI May 2006. Consultation Statement CSRIP and Town Centre AAP	

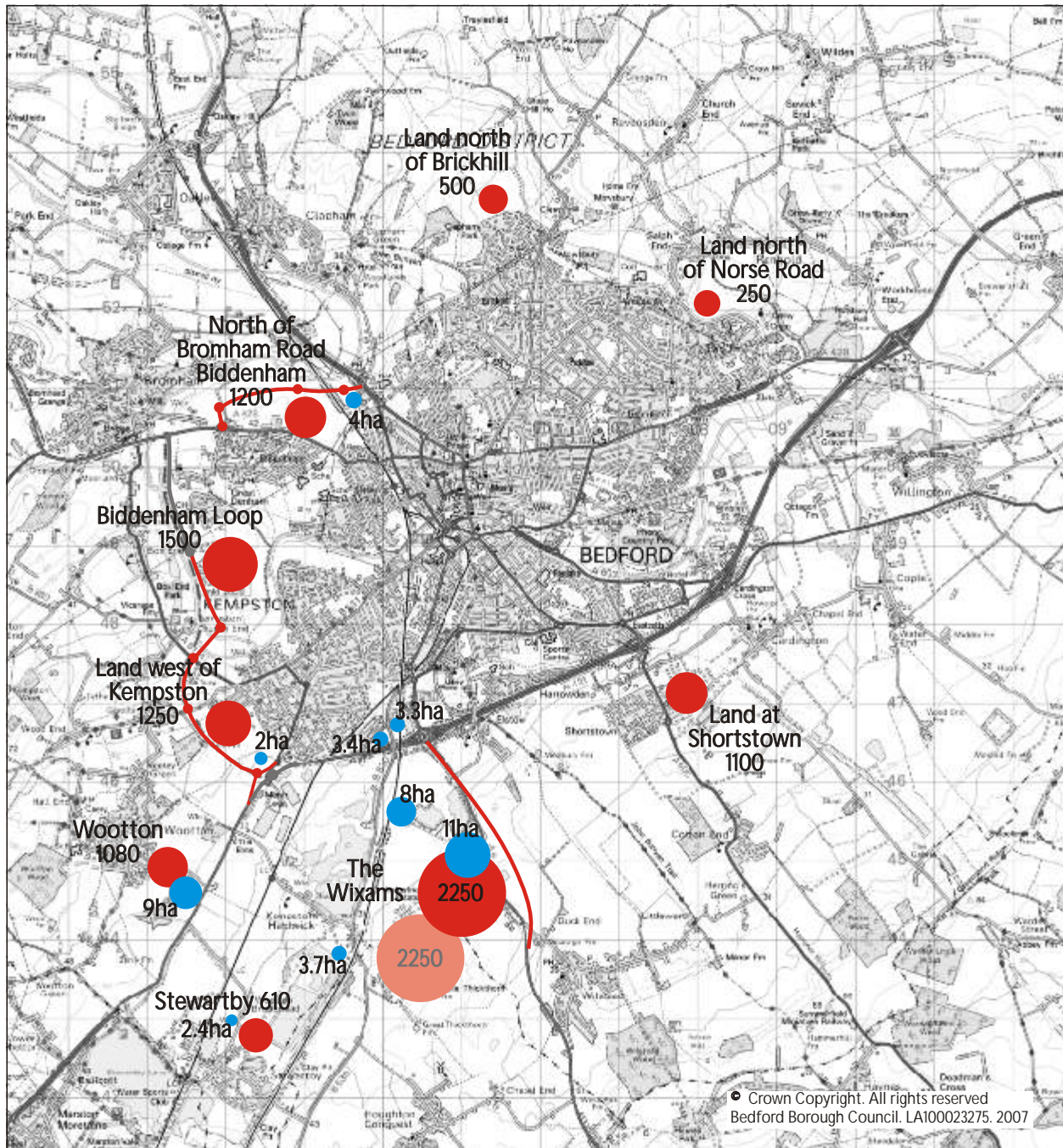
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Annexe C

Amendments to Figure 2

Figure 2 Local Plan 2002 Commitments

- Committed development (housing)
- Committed development (employment)
- Committed development in Mid Bedfordshire (housing)



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Annexe D

Amendments to Key Diagram

Key Diagram



	Rural Area		Road / Road Improvements
	Milton Keynes & South Midlands Sub-Regional Strategy Growth Area		Proposed Railway Station
	Bedford/Kempston Urban Area		Park & Ride
	Committed development site		Concept route of Milton Keynes/Bedford Canal
	Growth Area Key Service Centre		Railway
	Rural Key Service Centre		River Great Ouse

Bedford Borough Council Core Strategy and Rural Issues Plan – Inspector’s Report

Annexe E

Recommended Changes to Table 1 and Table 2 of Appendix F

Table 1 - Table of policies and related delivery agencies, mechanisms and timescales

Policy	Community Plan theme	Delivery agencies	Delivery mechanisms	Timescales
Policy CP1 – Spatial Strategy	<ul style="list-style-type: none"> Providing housing and building communities Strengthening the economy 	All service providers	Service providers’ strategies, Allocations DPD	None
Policy CP2 - Sustainable Development Principles	<ul style="list-style-type: none"> Promoting community safety Improving the environment Creating better transport Promoting leisure 	Developers, Borough Council, Renaissance Bedford	Allocations DPD, Development Control Policies DPD	None
Policy CP3 - The Location of Development	<ul style="list-style-type: none"> Providing housing and building communities Strengthening the economy 	All service providers	Allocations DPD	None
Policy CP4 - Key Service Centres	<ul style="list-style-type: none"> Providing housing and building communities Strengthening the economy 	All service providers	Allocations DPD, service providers’ strategies	None
CP5 -Sequential Approach	<ul style="list-style-type: none"> Providing housing and building communities Strengthening the economy 	Borough Council	Allocations DPD	None
Policy CP6 - The Scale and Pace of Housing Development	<ul style="list-style-type: none"> Providing housing and building communities 	Developers, RSLs, Renaissance Bedford	Allocations DPD	By 2021
Policy CP7 – Meeting Housing Needs	<ul style="list-style-type: none"> Providing housing and building communities 	Developers, RSLs	Development Control Policies DPD	None
Policy CP8 – Affordable Housing in the Borough	<ul style="list-style-type: none"> Providing housing and building communities 	Developers, RSLs, Borough Council, Partners	RSL funding, Housing Corporation	None
Policy CP9 – Accommodation for gypsies, travellers and travelling showpeople	<ul style="list-style-type: none"> Providing housing and building communities 	Borough Council	Allocations DPD	None
Policy CP10 - The Creation of Jobs	<ul style="list-style-type: none"> Strengthening the economy 	Developers, Borough Council, Renaissance Bedford, EEDA, BLEDP	Allocations DPD	By 2021
Policy CP11 - Employment Land	<ul style="list-style-type: none"> Strengthening the economy 	Developers, Borough Council, Renaissance Bedford, EEDA, BLEDP	Allocations DPD	None
Policy CP12 - Settlement Policy	<ul style="list-style-type: none"> Improving the environment 	Developers, Borough	Allocations DPD,	None

Policy	Community Plan theme	Delivery agencies	Delivery mechanisms	Timescales
Areas		Council	Development Control Policies DPD	
CP 13 The Countryside	<ul style="list-style-type: none"> Improving the environment 	Developers, Borough Council	Allocations DPD, Development Control Policies DPD	None
CP 14 – The location of development in the rural area	<ul style="list-style-type: none"> Providing housing and building communities Strengthening the economy 	All service providers	Allocations DPD	None
CP15 – Rural Exceptions	<ul style="list-style-type: none"> Providing housing and building communities Strengthening the economy 	Developers, RSLs, Borough Council	RSL funding, Housing Corporation, Development Control Policies DPD	None
CP16 – Rural key service centres	<ul style="list-style-type: none"> Providing housing and building communities Strengthening the economy 	All service providers	Allocations DPD, service providers' strategies	None
Policy CP17 - Housing Development in the Rural Area	<ul style="list-style-type: none"> Providing housing and building communities 	Developers, RSLs	Allocations DPD	None
Policy CP18 - Affordable Housing to Meet Local Needs in the Rural Area	<ul style="list-style-type: none"> Providing housing and building communities 	Developers, RSLs, Borough Council	RSL funding, Housing Corporation	None
Policy CP19 - Employment in a Rural Area	<ul style="list-style-type: none"> Strengthening the economy 	Developers	Allocations DPD	None
Policy CP20 Bedford Town Centre	<ul style="list-style-type: none"> All themes 	Developers, Renaissance Bedford	Town Centre Area Action Plan	None
Policy CP21 - Retail Hierarchy	<ul style="list-style-type: none"> Strengthening the economy 	Developers, Borough Council	Town Centre Area Action Plan, Development Control Policies DPD, Allocations DPD	None
Policy CP22 - Designing In Quality	<ul style="list-style-type: none"> Promoting community safety Improving the environment 	Developers	Development Control Policies DPD	None
Policy CP23 - Green Infrastructure	<ul style="list-style-type: none"> Improving the environment Promoting leisure 	Developers, Renaissance Bedford, Bedford Borough Council, Bedfordshire County Council, county-wide green infrastructure consortium	Allocations DPD, Development Control Policies DPD	None
Policy CP24 – Heritage	<ul style="list-style-type: none"> Improving the environment 	Developers	Development Control Policies DPD	None
Policy CP25 - Landscape Protection and	<ul style="list-style-type: none"> Improving the environment 	Developers	Development Control Policies DPD	None

Policy	Community Plan theme	Delivery agencies	Delivery mechanisms	Timescales
Enhancement				
Policy CP26 – Biodiversity	<ul style="list-style-type: none"> Improving the environment 	Developers	Development Control Policies DPD	None
Policy CP27 - Climate Change	<ul style="list-style-type: none"> Improving the environment Improving health 	Developers, all service providers	Climate Change SPD, Building Regulations	None
Policy CP28 - Strategic Transport Infrastructure	<ul style="list-style-type: none"> Creating better transport 	Highways Agency, East West Rail Consortium, Renaissance Bedford		Great Barford Bypass - Highways Agency Scheme completed 2006 (LTP – NR1) A421 – Highways Agency priority major scheme, Public Inquiry Dec 2007, Environmental works start Sept 2008, main works Jan 2009, likely completion 2010 (LTP – NR3) Thameslink Programme – Local Transport Plan major programmed scheme, anticipated opening 2013 (LTP – PT14) East-West rail Oxford to Bedford – East West Rail Consortium scheme under consideration, anticipated opening by 2013 (LTP – PT16)
Policy CP29 - Local Transport Plan	<ul style="list-style-type: none"> Creating better transport 	Developers, Bedfordshire County Council, Renaissance Bedford	Local Transport Plan	Bedford Western Bypass – Developer led (with some public sector contributions) priority major scheme, LTP funding approved, Contract let and works to start Oct 2007, anticipated opening

Policy	Community Plan theme	Delivery agencies	Delivery mechanisms	Timescales
				<p>2008/09 (LTP – LR9) Park and ride sites – Elstow site open, further 2 park and ride schemes at Biddenham and Clapham to be delivered 2009/10 and 2010/11 Batts Ford Bridge and town centre improvements Local Transport Plan priority major scheme as part of an overall transport package, likely completion 2012/13 (LTP – LR20) The Wixams A6 Re-Alignment – Developer led (with some public sector contributions) programmed scheme, work has commenced, anticipated opening 2008 (LTP – LR6) The Wixams rail station – Developer led and Growth Area Funded major transport scheme, first funding agreement signed Sept 2007, under consideration in the period to 2010/11 (LTP – PT17) Bedford Rail Station - Developer led (with some public sector contributions) major transport scheme under consideration in the period</p>

Policy	Community Plan theme	Delivery agencies	Delivery mechanisms	Timescales
				2011/12 to 2015/16 (LTP – PT24)
Policy CP30 – Accessibility	<ul style="list-style-type: none"> Creating better transport Including everyone 	Developers, Bedfordshire County Council	Allocations DPD, Development Control Policies DPD	None
Policy CP31 - Developer Contributions	<ul style="list-style-type: none"> All themes 	Developers, Borough Council, Renaissance Bedford		None
Policy CP32 - Plan, Monitor and Manage	<ul style="list-style-type: none"> Providing housing and building communities Strengthening the economy 	Borough Council		None

Table 2 - Table of Plan objectives and related policies, indicators and targets

Not all of the policies have targets due to their strategic nature. Where relevant indicators (along with their reference number from the AMR) are listed.

DPD Objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
1. Deliver the planned growth in Bedford, Kempston and the northern Marston Vale (Local Plan 2002 commitments - see Figure 2) to achieve a step change in the Borough's role in the region.	CP1 Spatial Strategy CP3 Location of development in the growth area CP4 Growth area key service centres CP6 Scale and pace of housing development CP10 Job creation CP11 Employment land CP32 Plan, monitor and manage	CP6 target: Housing development of 16,270 in the growth area between 2001-2021 CP10 target: Minimum of 16,000 jobs to be provided in the Borough by 2021 CP11 target: Up to 75 has of employment land to be provided in the Borough by 2021.	L4: Proportion of development within the growth area and rural area L1 a-e gypsy and traveller indicators L14: Number of jobs created in the Borough C2a: Housing Trajectory	C2a: If delivery varies by more than 20% of the dwelling requirement, reasons for this should be established and appropriate responses considered; this could include a review of the Allocations and Designations DPD. Delivery against the dwelling requirement will be measured over a 5 year rolling period. L14: If job growth falls 20% below the job growth target (800 p.a.) a review should be undertaken to establish reasons for this. This could be undertaken at District, County, sub-regional or regional level. Delivery against the job growth requirement will be measured over a 5 year rolling period.
2. Ensure future development is based upon sustainable development principles	CP1 Spatial Strategy CP2 Sustainable development CP3 Location of development in the growth		L4: Proportion of development within the growth area and rural area	

DPD Objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
	area CP5 sequential approach CP14 location of development in the rural area CP32 Plan, monitor and manage			
3. Provide guidance on where future growth should occur (in the period up to 2021)	CP1 Spatial Strategy CP3 Location of development CP5 sequential approach CP14 location of development in the rural area		L4: Proportion of development within the growth area and rural area	
4. Provide quality housing to meet current and future needs of all sectors of the community	CP1 Spatial Strategy CP6 Scale and pace of housing development CP7 Meeting housing needs CP8 Affordable housing CP9 Accommodation for Gypsies, Travellers and Travelling show people CP13 The countryside CP15 Rural exceptions CP17 Housing development in the rural area CP18 Affordable housing to meet local needs in the rural area	CP6 target: Housing development of 16,270 in the growth area between 2001-2021 CP17 target: Increase of 1250 net dwellings in the rural area 2001-2021	C2d: Affordable housing completions L1 a-e gypsy and traveller indicators C2a: Housing Trajectory	C2a: If delivery varies by more than 20% of the dwelling requirement, reasons for this should be established and appropriate responses considered; this could include a review of the Allocations DPD. Delivery against the dwelling requirement will be measured over a 5 year rolling period.
5. Foster significant employment growth	CP1 Spatial Strategy CP10 Job creation CP11 Employment land CP15 Plan, monitor and manage	CP8 target: Minimum of 16,000 jobs to be provided in the Borough by 2021 CP17 target: Increase of 1250 net dwellings in the	L14: Number of jobs created in the Borough C2a: Housing Trajectory	C2a: If delivery varies by more than 20% of the dwelling requirement, reasons for this should be established and appropriate

DPD Objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
	CP17 Housing development in the rural area CP19 Employment in the rural area	rural area 2001-2021 CP11 target: Up to 75 has of employment land to be provided in the Borough by 2021.	C1a: Amount of floorspace developed for employment by type New: Jobs created in the rural area	responses considered; this could include a review of the Allocations DPD. Delivery against the dwelling requirement will be measured over a 5 year rolling period. L14: If job growth falls 20% below job growth target (800 p.a.) a review should be undertaken to establish reasons for this. This could be undertaken at District, County, sub-regional or regional level. Delivery against the job growth requirement will be measured over a 5 year rolling period.
6. Direct retail development to the most appropriate locations	CP1 Spatial Strategy CP20 Bedford town centre CP21 Retail hierarchy	Capacity of 6,000 sqm net convenience goods floorspace by 2011 and 30,000 sqm net comparison goods floorspace by 2011 increasing to 47,000 sqm by 2016. (The Town Centre Area Action Plan allocates 31,200 sqm of retail floorspace, the delivery of which will be monitored by that plan).	C4a: Amount of completed retail, office and leisure development C4b: Amount of completed retail, office and leisure development in town centres	C4a&b: If the identified retail of the three key sites allocated in the Town Centre Area Action Plan is not likely to be delivered, an updated retail capacity study should be undertaken to consider the reasons for this, to review the amount of additional floorspace likely to be needed and to consider the scope for expansion of the Primary Shopping Area.
7. Foster the regeneration of	CP1 Spatial Strategy		L15: Percentage of vacant	

DPD Objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
Bedford town centre to enable it to fulfil a greater role within the region	CP20 Bedford town centre CP21 Retail hierarchy		units within the primary shopping area of Bedford town centre L17: Footfall levels in the town centre 'C4a: Amount of completed retail, office and leisure development' 'C4b: Amount of completed retail, office and leisure development in the town centre'	
8. Support the delivery of coordinated transport improvements with the emphasis on non-car modes, improving east-west communications and achieving greater transport interchange	CP1 Spatial Strategy CP2 Sustainable development CP28 Strategic transport infrastructure CP29 Local Transport Plan CP30 Accessibility CP32 Plan, monitor and manage		L3: Level of proposed transport infrastructure set out in the RSS and LTP2 that has been achieved L23: Mode of transport to work	
9. Encourage key rural communities to become more sustainable places to live and work	CP1 Spatial Strategy CP3 Location of development in the growth area CP4 Key service centres CP6 Scale and pace of housing development CP12 Settlement policy areas CP13 The countryside CP14 Location of development in the rural area	CP6 target: Housing development of 16,270 in the growth area between 2001-2021 CP17 target: Increase of 1250 net dwellings in the rural area 2001-2021	New: Level of services in rural area L11: Rural households within 13 minutes walk of an hourly bus service L4: Proportion of development within the growth area and rural area New: Proportion of development in the rural	C2a: If delivery varies by more than 20% of the dwelling requirement, reasons for this should be established and appropriate responses considered; this could include a review of the Allocations DPD. Delivery against the dwelling requirement will be measured over a 5 year rolling period.

DPD Objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
	CP15 Rural Exceptions CP16 Rural key service centres CP17 Housing development in the rural area CP19 Affordable housing to meet local needs in the rural area CP23 Employment in the rural area		area outside of key service centres C2a: Housing Trajectory New: Jobs created in the rural area	
10. Achieve high quality design that takes account of character and local distinctiveness, enables access and promotes community safety	CP1 Spatial Strategy CP2 Sustainable development CP22 Designing in quality		L20: Quality of new development in terms of design and landscaping and respecting local character L25: Planning permissions granted with conditions relating to good access provision for disabled people	
11. Protect and enhance the countryside and the quality and connectivity of green infrastructure in the Borough with particular emphasis on enhancing the Marston Vale	CP1 Spatial Strategy CP2 Sustainable development CP23 Green infrastructure CP12 Settlement policy areas CP13 The countryside CP14 Location of development in the rural area CP15 Rural Exceptions CP24 Heritage CP25 Landscape protection and enhancement CP26 Biodiversity		L18: Amount of open space in new housing developments granted planning permission L5 % of SSSIs in favourable condition. L6: Increase in areas of woodland in the Growth Area	
12. Minimise the use of	CP1 Spatial Strategy		C9: Renewable energy	

DPD Objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
energy and encourage greater use of energy from renewable sources	CP2 Sustainable development CP22 Designing in quality CP27 Climate change CP30 Accessibility		capacity installed by type	
13. Provide a mechanism for the delivery of infrastructure (including health, educations, transport, community, leisure and recreation facilities) in tandem with new development	CP1 Spatial Strategy CP2 Sustainable development CP10 Strategic transport infrastructure CP23 Green infrastructure CP29 Local Transport Plan		L3: Level of proposed transport infrastructure set out in the RSS and LTP2 that has been achieved New: Completed infrastructure schemes secured from planning permission legal agreements	
14. Protect and enhance the Borough's built, cultural and community assets and the character of settlements and foster the development of the Borough as a destination for heritage and cultural tourism	CP1 Spatial Strategy CP2 Sustainable development CP31 Developer contributions CP22 Designing in quality CP24 Heritage		L7: Listed buildings at risk L20: Quality of new development in terms of design and landscaping and respecting local character New: Income from tourism as a % of total GDP	
15. Protect the environment by minimising the risk of flooding and the effects of climate change and facilitating improvements in air quality	CP1 Spatial Strategy CP2 Sustainable development CP22 Designing in quality CP27 Climate change	C7: Zero planning permissions granted contrary to Environment Agency advice.	C9: Renewable energy capacity installed by type C7: Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality	

DPD Objective	DPD policies related to that objective	Associated targets	Indicators	Triggers
			L19: Designated air quality management areas	
16. Involve the community in the decisions about the planning of the Borough so they can influence and shape such decisions	CP1 Spatial Strategy		<p>New: Number of respondents to planning consultations</p> <p>‘The effectiveness of the Council’s community engagement in planning will be monitored against the Statement of Community Involvement and reported in the AMR’</p>	