

Central Bedfordshire  
Council  
Priory House  
Monks Walk  
Chicksands,  
Shefford SG17 5TQ

**This meeting  
will be filmed.\***



**Central  
Bedfordshire**

**please ask for** Sandra Hobbs  
**direct line** 0300 300 5257  
**date** 18 April 2018

## **NOTICE OF MEETING**

### **COUNCIL**

Date & Time

**Thursday, 26 April 2018 6.30 p.m.**

Venue at

**Council Chamber, Priory House, Monks Walk, Shefford**

Richard Carr  
**Chief Executive**

To: The Chairman and Members of the COUNCIL:

***MEMBERS OF THE PRESS AND PUBLIC ARE WELCOME TO ATTEND THIS  
MEETING***

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# AGENDA

## Prayers

The Reverend Stephen Nuth will take prayers.

1. **Apologies**

Apologies for absence to be received.

2. **Minutes**

To approve the minutes of the Council meeting held on 22 February 2018.

3. **Members' Interests**

To receive from Members any declarations of interest.

4. **Questions, Statements and Deputations**

To receive any questions, statements and deputations from members of the public in accordance with the Public Participation Procedure as set out in Part 4G of the Constitution.

5. **Petitions**

To receive and discuss petitions if any, in accordance with the Public Participation Procedure as set out in Part 4G of the Constitution.

6. **Chairman's Announcements and Communications**

The Chairman to announce any matters of communication.

7. **Leader of the Council's Announcements and Communications**

The Leader of the Council to announce any matters of communication.

8. **Executive Member Presentations**

To receive reports from up to three Executive Members on recent matters of interest and ask questions on matters contained within the reports.

Reports are anticipated from:

- Councillor Hegley, Executive Member for Adults, Social Care and Housing Operations
- Councillor Dalgarno, Executive Member for Community Services.

9. **Recommendation from the Executive**

To consider a recommendation from the meeting of the Executive, 3 April 2018 and answer questions asked under Part 4A, Rule No. 13.1 of the Council's Procedure Rules.

- Capital Budget Monitoring Forecast Outturn Report (Quarter 3)

10. **Central Bedfordshire Local Plan**

To approve the draft Local Plan for submission to the Secretary of State. Please note that the Central Bedfordshire Local Plan considered by the Executive on 9 January 2018 will be referred to and can be viewed via the following link:

<http://centralbeds.moderngov.co.uk/ieListDocuments.aspx?CId=577&MId=5348&Ver=4>

11. **RAF Henlow Site**

To outline the significant opportunity to regenerate the strategically important site at RAF Henlow and seek endorsement for Central Bedfordshire Council to explore options to transfer or purchase ownership of the RAF Henlow site from the Ministry of Defence.

12. **Motions**

To consider motions by Members of the Council under Part 4A, Rule No. 17 of the Council's Procedure Rules in the order received.

13. **Written Questions**

To answer written questions from Members of the Council under Part 4A, Rule No. 13.2 of the Council's Procedure Rules.

14. **Open Questions**

To answer Open Questions asked by Members of the Council under Part 4A, Rule No. 13.7 of the Council's Procedure Rules.

## CENTRAL BEDFORDSHIRE COUNCIL

At a meeting of the **COUNCIL** held in the Council Chamber, Priory House, Monks Walk, Shefford on Thursday, 22 February 2018.

### PRESENT

Cllr B Saunders (Vice-Chairman)

Cllrs	R D Berry	Cllrs	Ms A M W Graham	Cllrs	I Shingler
	D Bowater		Mrs D B Gurney		P Smith
	A D Brown		Mrs C Hegley		B J Spurr
	J Chatterley		J G Jamieson		R C Stay
	K M Collins		K Janes		Mrs T Stock
	N B Costin		J Kane		T Swain
	I Dalgarno		D J Lawrence		A M Turner
	S Dixon		Mrs J G Lawrence		M A G Versallion
	Mrs A L Dodwell		Cllr M Liddiard		B Walker
	P Downing		K C Matthews		N Warren
	P A Duckett		D McVicar		S Watkins
	K Ferguson		R Morris		B Wells
	F Firth		T Nicols		R D Wenham
	Mrs J Freeman		G Perham		T Woodward
	E Ghent		A Ryan		J N Young
	C C Gomm		J A G Saunders		A Zerny
	Mrs S A Goodchild		D Shelvey		

### Apologies for Absence

Cllrs	Mrs A Barker	Cllrs	Mrs S Clark	Cllrs	G Tubb
	M C Blair		P Hollick		
	Mrs C F Chapman MBE		Ms C Maudlin		

### Absent

Cllr R Johnstone

Officers:	Miss H Bell	–	Committee Services Officer
	Mr R Carr	–	Chief Executive
	Mr M Coiffait	–	Director of Community Services
	Mrs S Harrison	–	Director of Children's Services
	Mrs S Hobbs	–	Senior Committee Services Officer
	Mr J Longhurst	–	Director of Regeneration and Business
	Mrs J Ogle	–	Director of Social Care, Health and Housing
	Mrs C Shohet	–	Assistant Director of Public Health
	Mr C Warboys	–	Director of Resources

In the absence of the Chairman, the Vice-Chairman chaired the meeting.

## **PRAYERS**

Prayers were taken by Reverend Bill Britt.

### **C/17/70 Minutes**

## **RESOLVED**

**that the minutes of the Council meeting held on 10 January 2018 were approved as a correct record, subject to an amendment to resolution 1 on minute C/17/59 'Recommendations from the Executive, 1) Central Bedfordshire Local Plan' to read as follows:**

- 1. that the draft Pre-Submission Local Plan be approved for the purposes of publication for consultation.**

### **C/17/71 Members' Interests**

No declarations of interest were received.

### **C/17/72 Questions, Statements and Deputations**

Two members of the public had registered to speak on item 7, 'Recommendations from the Executive, (a) Budget 2018/19 and Medium Term Financial Term Financial Plan'.

Dr Egan raised concerns about an increase in Council Tax and highlighted the proposal for a new national insurance plan as set out in a recent report on Health and Social Care by the Liberal Democrats Party.

In response, the Deputy Leader and Executive Member for Corporate Resources indicated that he looked forward to a forthcoming consultation paper from the Government covering proposals for the future funding of social care.

Mrs Bagchi enquired about the costs associated with fluoridation in water.

In response to the question, the Executive Member for Health explained that the costs associated with fluoridation covering Central Bedfordshire were lower than suggested and referred to the National Institute for Health and Clinical Excellence's views and the return on investment.

**C/17/73 Chairman's Announcements and Communications**

The Vice-Chairman updated Members on the health of the Chairman and undertook to convey the Council's best wishes to her for a speedy recovery.

In accordance with Local Authorities (Standing Order) (England) (Amendment) Regulations 2014 there would be a recorded vote for agenda items 7 (a), (b),(c) and (g).

**C/17/74 Leader of the Council's Announcements and Communications**

The Leader provided an update on the Oxford to Cambridge Corridor and advised that a proposal would be presented to Council to establish a Central Area Growth Board. The Government was also inviting authorities within the Central Area to consider entering into 'growth deals' to help unlock investment and this issue was under consideration.

**C/17/75 Recommendations from the Executive**

**(a) Budget 2018/19 and Medium Term Financial Plan.**

The Council considered recommendations from the meeting of the Executive held on 6 February 2018, seeking approval of the proposed Medium Term Financial Plan and Revenue Budget for 2018/19.

In his introduction, the Deputy Leader and Executive Member for Corporate Resources commented on the range of external factors which had influenced the proposed budget. In particular, the reductions in Government funding, the loss of the Revenue Support Grant in 2019/20 and the welcomed but unfunded increases in the Living Wage. He commented on the outcome of the public consultation and that the draft budget had been scrutinised by the Corporate Resources Overview and Scrutiny Committee.

He spoke about the pressure on services, particularly in social care with the increase in population and the number of residents aged between 65 to 85 years old increasing. He also highlighted the additional pressure resulting from the increase in vulnerable children, school transport costs and homelessness.

The final Local Government Finance Settlement had been received which, included an additional one year only grant ring fenced for adult social care. The New Homes Bonus would continue, although at a reduced rate and this would provide some support to the General Fund with a small surplus going to a reserve to help fund future capital investments.

The Executive Member highlighted the statutory requirements relating to specific budget proposals, as set out in Appendix F to the Executive report.

In response to the budget consultation, the Executive Member for Corporate Resources advised that the Executive had recommended a Council Tax rise of 1.49%, a lower rate of increase than one of the options set out in the Council's public consultation exercise and a 3.0% increase specifically to help fund adult social care.

The Leader of the Independent Group commented on the response from the public consultation to the increase in the Council Tax.

The Leader of the Labour Group advocated that a progressive approach to taxation to encourage growth and minimise the impact on local people on lower income.

Other Members of the Council were invited to comment on the proposed budget.

The Leader and the Deputy Leader and Executive Member for Corporate Resources responded to comments made during the debate.

## **RESOLVED**

- 1. that the Revenue Budget for 2018/19 and the Medium Term Financial Plan for 2018/19 to 2021/22 be approved; and**
- 2. that in line with the Government guidance, the following increases in Council tax (CBC element) for residents of Central Bedfordshire be applied:**
  - (a) a Band D increase of £21.24, representing a 1.494% increase on the charge for 2017/18; and**
  - (b) a Band D increase of £42.66, representing a 3.0% increase on the charge for 2017/18, reflecting a precept of this amount to help fund adult social care costs.**

**In total the Band D increase will be £63.90, representing a 4.494% increase in the charge for 2017/18. The CBC element of Band D Council Tax for 2018/19 will therefore be £1,485.78.**

**In accordance with the Local authorities (Standing Orders)(England) (Amendment) Regulations 2014, a recorded vote was taken.**

**Those in favour of the resolution were:**

**Councillors: Berry, Bowater, Brown, Chatterley, Collins, Costin, Dalgarno, Dixon, Dodwell, Downing, Duckett, Ferguson, Firth, Freeman, Ghent, Gomm, Goodchild, Graham, Gurney, Hegley, Jamieson, Janes, Kane, D Lawrence, J Lawrence, Liddiard, Matthews, McVicar, Morris, Nicols, Perham, B Saunders, J Saunders, Shelvey, Smith, Spurr, Stay, Stock, Turner, Versallion, Walker, Warren, Watkins, Wells, Wenham, Woodward and Young.**

**Councillors Ryan, Swain and Zerny voted against the resolution.**

**Councillor Shingler abstained from voting.**

**(b) Capital Programme 2018/19 to 2021/22.**

The Council considered the recommendations from a meeting of the Executive held on 6 February 2018 setting out the proposed Capital Programme for 2018/19 – 2021/22.

The Deputy Leader and Executive Member for Corporate Resources drew attention to some of the major investments planned, including:

- £28M for Integrated Health and Care Hubs, including in Biggleswade
- £48M on new schools and school places
- £55M to fund the A6-M1 link road starting from the new Junction 11a on the M1
- £18M for the dualling of the A421 between Junction 13 M1 and Milton Keynes Magna Park
- £14M to provide new leisure and library services in Dunstable.

**RESOLVED**

**that the Capital Programme for 2018/19 to 2021/22 be approved.**

**In accordance with the Local authorities (Standing Orders)(England) (Amendment) Regulations 2014, a recorded vote was taken.**

**Those in favour of the resolution were:**

**Councillors: Berry, Bowater, Brown, Chatterley, Collins, Costin, Dalgarno, Dixon, Dodwell, Downing, Duckett, Ferguson, Firth, Freeman, Ghent, Gomm, Goodchild, Graham, Gurney, Hegley, Jamieson, Janes, Kane, D Lawrence, J Lawrence, Liddiard, Matthews, McVicar, Morris, Nicols, Perham, Ryan, B Saunders, J Saunders, Shelvey, Smith, Spurr, Stay, Stock, Swain, Turner, Versallion, Walker, Warren, Watkins, Wells, Wenham, Woodward and Young.**

**Councillors Shingler and Zerny voted against the resolution.**

**No Councillors abstained from voting.**

**(c) Budget for the Housing Revenue Account (Landlord Business Plan).**

The Council considered the recommendations from the meeting of the Executive held on 6 February 2018 in respect of the Housing Revenue Account (Landlord Business Plan).

The Deputy Leader and Executive Member for Corporate Resources and the Executive Member for Adults, Social Care and Housing Operations set out the proposals covering the Housing Revenue Account.

In response to a question the Executive Member for Adults, Social Care and Housing Operations referred to steps planned and underway designed to bring empty homes back into use.

## **RESOLVED**

- 1. that the recent legislative changes relating to Housing Finance and their impact on the Landlord Business Plan, be noted;**
- 2. that the transfer of the former Care Home at the Birches in Shefford (once fully vacated) from the Council's General Fund to the HRA, at a transfer value of £1.15M, be approved;**
- 3. that the Landlord Business Investment Plan, which proposes HRA investment throughout the Council area, be approved;**
- 4. that the HRA Revenue Budget for 2018/19 and the Landlord Business Plan summary at Appendices A and B to the Executive report, be approved;**
- 5. that the 2018/19 to 2021/22 HRA Capital Programme at Appendix C to the Executive report, be approved; and**
- 6. that the average rent decrease of 1% for Council tenancies for 2018/19 in line with the national rental decrease, be approved.**

**In accordance with the Local Authorities (Standing Orders)(England) (Amendment) Regulations 2014, a recorded vote was taken.**

**Those in favour of the resolution were:**

**Councillors: Berry, Bowater, Brown, Chatterley, Collins, Costin, Dalgarno, Dixon, Dodwell, Downing, Duckett, Ferguson, Firth, Freeman, Ghent, Gomm, Goodchild, Graham, Gurney, Hegley, Jamieson, Janes, Kane, D Lawrence, J Lawrence, Liddiard, Matthews, McVicar, Morris, Nicols, Perham, Ryan, B Saunders, J Saunders, Shelvey, Smith, Spurr, Stay, Stock, Swain, Turner, Versallion, Walker, Warren, Watkins, Wells, Wenham, Woodward, Young and Zerny.**

**No Councillors voted against the resolution.**

**No Councillors abstained from voting.**

**(d) Treasury Management Strategy and Treasury Policy**

The Council considered recommendations from a meeting of the Executive held on 6 February 2018 in respect of the Treasury Management Strategy and Treasury Policy.

**RESOLVED**

**that the Treasury Management Policy, Treasury Management Strategy Statement, Prudential Indicators and Minimum Revenue Provision Policy for 2018/19 be approved.**

Upon being put to the vote 49 Members voted in favour and 2 Members voted against the resolution.

**(e) Social Care, Health & Housing Fees and Charges 2018/19**

The Council considered recommendations from a meeting of the Executive held on 6 February 2018 in respect of Social Care Health and Housing Fees and Charges 2018/19.

The Deputy Leader and Executive Member for Corporate Resources drew attention to the comments and recommendations from the Corporate Resources Overview and Scrutiny Committee.

**RESOLVED**

- 1. that the revised fees and charges for 2018/19, as set out at Appendices A and B to the Executive report, be approved; and**
- 2. that the new fees and charges to be introduced for 2018/19, as set out at Appendix C to the Executive report, be approved.**

The decision was unanimous.

**(f) Traded Services to Schools and Academies 2018/19**

The Council considered recommendations from a meeting of the Executive held on 6 February 2018 concerning Traded Services to Schools and Academies 2018/19.

**RESOLVED**

- 1. that the revised charges for Traded Services to Schools and Academies for 2018/19, as set out at Appendix A to the Executive report, be approved;**
- 2. that the charges for the new services to be introduced for 2018/19, as set out at Appendix B to the Executive report, be approved; and**

3. that the year on year changes to charges, set out at Appendix C, and the volumetrics analysis for 2016/17 and 2017/18, set out at Appendix D to the Executive report, be approved.

The decision was unanimous.

**(g) Council Tax Resolution.**

The Council considered a recommendation in respect of the Council Tax Resolution as set out at Appendix A to the report submitted. The detailed individual parish precepts were set out at Appendix B.

**RESOLVED**

**That the Council Tax Resolution as set out in appendix A be approved.**

**In accordance with The Local Authorities (Standing Orders) (England) (Amendment) Regulations 2014, a recorded vote was taken.**

**Those in favour of the resolution were:**

**Councillors: Berry, Bowater, Brown, Chatterley, Collins, Costin, Dalgarno, Dixon, Dodwell, Downing, Duckett, Ferguson, Firth, Freeman, Ghent, Gomm, Goodchild, Graham, Gurney, Hegley, Jamieson, Janes, Kane, D Lawrence, J Lawrence, Liddiard, Matthews, McVicar, Morris, Nicols, Perham, B Saunders, J Saunders, Shelvey, Shingler, Smith, Spurr, Stay, Stock, Swain, Turner, Versallion, Walker, Warren, Watkins, Wells, Wenham, Woodward and Young.**

**Coucillors Ryan and Zerny voted against the resolution.**

**No Councillors abstained from voting.**

C/17/76

**Revised Composition of the Executive and Scheme of Delegation of Executive Functions**

**NOTED**

- (1) that Councillor Steve Dixon had been designated as Lead Member for Children's Services;
- (2) the revision to the composition of the Executive and the allocation of portfolios, as set out at Appendix A; and
- (3) the scheme of delegation of Executive functions, as set out at Part C3 of the Council's Constitution.

C/17/77

**Change of Membership on Committees**

**NOTED that Councillor Dixon had replaced Councillor Costin on the Corporate Parenting Panel.**

(Note: The meeting commenced at 6.30 p.m. and concluded at 7.55 p.m.)

Chairman .....

Dated .....

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## COUNCIL MEETING – 26 APRIL 2018

### Recommendation to Council from the Executive meeting held on 3 April 2018

#### E/17/137 **Capital Budget Monitoring Forecast Outturn Report (Quarter 3)**

The Executive considered a report from the Deputy Leader and Executive Member for Corporate Resources that set out the Capital forecast outturn for 2017/18 at as December 2017. The forecast outturn was a substantial under spend against budget. Primarily this was due to a number of schemes which were dependent on the award of external funding, such as:

- A421 dualing
- M1/A6 Link Road
- East / West Rail.

Reason for decision: To facilitate effective financial management and planning.

#### **RESOLVED**

1. that the gross forecast outturn of £79.8m, excluding HRA, but including deferred spend from 2016/17 which was currently below the approved budget by £30.9m (£6.1m below last year against a higher budget of £132.6m), be noted; and
2. that the new forecast is £18.0m below budget (£9.5m below budget at the same stage last year) be noted.

#### **RECOMMENDED TO COUNCIL**

***that the budget for the Stratton Phase 5 project be increased from £2.7m in the 2018/19 Capital Programme to £4.8m, as set out in paragraphs 54 and 55 in Appendix A to the Executive report.***

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## Central Bedfordshire Council

COUNCIL

Thursday 26 April 2018

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### Central Bedfordshire Local Plan

Report of: Cllr Nigel Young, Executive Member for Regeneration  
([nigel.young@centralbedfordshire.gov.uk](mailto:nigel.young@centralbedfordshire.gov.uk))

Responsible Director: Jason Longhurst, Director of Regeneration and  
Business ([jason.longhurst@centralbedfordshire.gov.uk](mailto:jason.longhurst@centralbedfordshire.gov.uk))

**This report relates to a decision that is Key**

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#### Purpose of this report

1. This report presents the submission version of the Central Bedfordshire Local Plan. The report seeks authorisation to submit the submission draft plan to the Secretary of State on 30<sup>th</sup> April 2018. This final submission draft has been prepared using a range of background evidential work. Feedback from the consultation has been used to propose minor modifications to the Plan which will be submitted alongside all representations and supporting evidence to the Secretary of State.

#### RECOMMENDATIONS

##### Council is asked to:

1. **authorise the submission of the Local Plan to the Secretary of State for examination.**

#### Local Plan Overview

1. The Central Bedfordshire Local Plan is the key strategic planning document for Central Bedfordshire and will guide and support the delivery of new infrastructure, homes and jobs. It sets out the long-term vision and objectives for the area, what is going to happen, where, and how this will be achieved and delivered up until 2035. The detailed policies within it will also be used to determine planning applications. This submission version of the Plan and the accompanying schedule of proposed minor modifications constitutes a sustainable strategy informed by consultation and technical evidence gathered to date.

2. The lifespan of the document is 20 years, but it is anticipated that once adopted, elements of it will have to be reviewed earlier in order to be able to respond to a number of emerging strategies; notably the Cambridge–Milton Keynes-Oxford Arc as identified by the National Infrastructure Commission<sup>1</sup>.
3. While the potential of Central Bedfordshire to play a core role in relation to the Oxford to Cambridge corridor is acknowledged in the recent National Infrastructure Commission reports, and the Government's response in the Autumn Budget 2017, the timing, service and route selection for new strategic road and rail infrastructure, needs further development and definition. Related issues such as potential for capacity upgrades of the A1 have still to be resolved. These decisions, for example on new east-west rail stations, will have a major impact on the scale of development and growth potential at strategic sites.
4. The Council is therefore putting in hand a further assessment of the potential of the Identified Areas for Future Growth that are referenced at paragraph 21 to run alongside emerging decisions on strategic infrastructure routes, timing and services, together with provision of wider infrastructure and delivery support. This assessment will inform a Partial Review of this Plan and contribute to the ongoing work of the Central Corridor Area. The Partial Review is proposed to start within six months of adoption of this Plan and complete as soon as decisions on routing and financial commitment to strategic infrastructure are in place. This is entirely consistent with national planning policy and emerging government policy approaches as set out in the Housing White Paper (February 2017) and the recent consultation 'Planning for the Right Homes in the Right Places (September 2017).
5. This document is the final draft plan, known as the submission plan which together with the schedule of proposed minor modifications, represents the Council's considered approach to planning for growth based on the Shaping Central Bedfordshire consultation, Community Planning input and the new and updated evidence base. This has been supplemented by some further updates at submission in some areas of supporting evidence, including transport modelling, flood risk, infrastructure and the Duty to Co-operate.

### **Status of the Local Plan**

6. This Local Plan once adopted replaces the North Core Strategy and Development Management Policies Document (2009) and the majority of the remaining policies within the South Bedfordshire Local Plan (2004), the Mid Bedfordshire Local Plan (2005) and the remaining saved policies of the Bedfordshire and Luton Minerals and Waste Local Plan (2005) so far as they affect Central Bedfordshire.

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<sup>1</sup> National Infrastructure Commission Report, November 2017

Those residual site allocations in the north Site Allocations Document (2011) that are not already built out will remain in addition to the Minerals and Waste Local Plan – Strategic Sites and Policies (2014) which will sit alongside this new Local Plan once adopted forming the Development Plan for Central Bedfordshire.

### **Scale of Growth**

7. The Plan is required to meet the Council's objectively assessed need (OAN) for housing for the plan period together with any agreed unmet need from neighbouring authorities, identified through Duty to Co-operate discussions. When the first draft of the Local Plan was released for consultation last summer, the Council was aware that the government were due to consult on a standardised methodology for calculating the level of housing need by local authority area. In view of this, it planned for a range of between 20-30,000 new additional homes and 24 – 30,000 new jobs.
8. This consultation which included the new methodology was then subsequently published on 14th September 2017. The housing need figure for Central Bedfordshire that was generated by this standard approach was 2553 homes per annum. This represented a substantial 60% increase on our current OAN of 1600 homes per annum and was far in excess of the average increase of 35% across local authority areas nationally. It is proposed that this new methodology applies when the revised National Planning Policy Framework (NPPF) is published in the summer.
9. Currently delivery rates are nearly 1800 homes a year so this would represent a very significant step change where indeed even if this number of homes were planned for in a Local Plan, they could not practically be delivered on the ground due to lack of skilled labour, materials and potentially land banking by developers.
10. There are also very grave implications for five year housing land supply if this new OAN were to be in place. The Council would not be able to demonstrate a five year housing land supply and so consequently it would be more difficult to resist speculative planning applications leading to unplanned and unsustainable development.
11. A Council motion that expressed grave concerns about the fairness and deliverability of this new increased 'need' figure for Central Bedfordshire was unanimously endorsed by Council on 27th September 2017.
12. Following this a timetable that allowed for submission of the Local Plan in advance of the implementation date for this new methodology (the date of publication of the revised NPPF) was endorsed by Executive on 10 October 2017. This means that our current published OAN of 32,000 homes can be retained.

13. This has then been used as the baseline for developing a 'plan target' which is an overall housing requirement figure that includes the OAN, together with any contingency and any agreed unmet need.
14. Therefore in adopting this accelerated timetable, the lower end of the range set out in the first consultation draft has been planned for. The overall plan target is 39,350 homes; this is comprised of the OAN (32,000 homes) and Luton's residual 'unmet need' (7350 homes). This gives rise to the need to plan for up to 20,000 new homes at a range of scales in addition to delivering the growth that is already committed.

### **Spatial Strategy**

15. The spatial strategy is a set of key principles that guides the Council's approach to the distribution and types of growth. The strategy is set out below.

The Plan seeks to:

- Build on our existing and emerging economic strengths in key sectors and deliver a minimum of 24,000 new jobs.
- Deliver around 39,350 new homes through new villages, moderate extensions to existing towns and villages in line with the provision of new infrastructure and to meet identified housing need close to key transport corridors (East-west, A1/East Coast Mainline and M1/Thameslink). This includes 23,845 homes that are already planned for or built.
- Balance the delivery of significant sustainable infrastructure and growth with the enhancement and protection of existing communities, landscape, heritage and countryside and actively prevent the coalescence of settlements across the area, through the creation of Important Countryside Gaps outside of Green Belt.
- Maximise potential opportunities for the intensification and redevelopment e.g. RAF Henlow and the regeneration of urban areas (Biggleswade, Dunstable, Houghton Regis, Flitwick, Leighton Linlade & Sandy) through town centre frameworks or masterplans.
- Identify and deliver spatial options and strategic opportunities that could provide for longer term economic and housing growth at Tempsford, Biggleswade and in the Marston Vale. This growth will support, and must be supported by, new strategic infrastructure particularly the Oxford – Cambridge Expressway, A1 improvements and new rail stations/transport interchanges along the East West Rail route.

- Ensure that growth is designed and delivered in ways which benefit existing neighbouring communities, for example through improved transport facilities or regeneration of local commercial facilities.
- Deliver housing need identified for the Luton HMA and some unmet need from Luton close to where it arises where there is capacity to do so sustainably. This will be through a strategic extension close to Luton's urban edge and moderate extensions to existing villages and towns with good connectivity and access to services. This will mean releasing some Green Belt land where exceptional circumstances can be demonstrated.

### **Proposed Strategic Site Allocations**

16. Given the limited scale of existing urban development across most of Central Bedfordshire, there are not sufficient opportunities to accommodate all of the new growth required either as infill, by re-using redundant sites, or in village or urban extensions. In many of these locations, services and infrastructure are unsuitable (or could not easily be upgraded) beyond moderate scale additions. This Plan has therefore identified draft allocations and safeguarded locations where large scale new communities can be delivered.
17. These new settlements or strategic scale extensions have capacity for a minimum of 1500 homes and can provide a mix of housing types and tenures as well as a range of new services and facilities. These new communities provide the opportunity to secure new physical, social and community infrastructure and higher standards of design and sustainable development; though it is recognised that these need upfront funding and have longer build out trajectories often stretching beyond this plan period.
18. The proposals strategic allocations are set out below:  
New Villages
  - Marston Vale (up to 5000 homes)
  - East of Biggleswade (around 1500 homes)  
Town Extensions
  - North of Luton (around 4000 homes)
  - East of Arlesey (around 2000 homes)

### **Proposed Non-Strategic Allocations**

19. In addition to the strategic site allocations identified above, the Plan also allocates 52 small and medium sites for residential development for a total number of 5505 homes; these are set out at Section 7 of the Plan at Appendix A.

Ranging in size from 11 up to 650 dwellings, and spread throughout Central Bedfordshire; these can be brought forward for development more quickly than larger sites, and so aid delivery. These smaller sites will also provide better choice in the market, opportunities for SME builders, and enable our settlements to grow in ways that are sustainable, and respect and enhance the character and identity of our settlements and countryside in accordance with the strategic approach set out at paragraph 14.

### **Identified Locations for Future Growth**

20. Central Bedfordshire is one of the most connected locations in England and sits within the Cambridge–Milton Keynes-Oxford Arc; as such it has been highlighted by Government and the National Infrastructure Commission as an area with high growth potential subject to the necessary infrastructure being delivered. There is however still some uncertainty about the route of East-West Rail, the Oxford –Cambridge Expressway and potential upgrades to the A1 through Central Bedfordshire. The realisation of these significant transport projects will be required to deliver any higher level of growth.
21. The Plan therefore makes provision for a number of locations to be identified for future growth. These are areas which may be required to serve development needs in the longer term beyond the plan period or potentially at an earlier point in time if the wider context changes. These areas have a basic technical capacity but no housing numbers have been attributed to them and therefore significantly they do not contribute to the plan target of 39,350 homes.
22. Essentially there is currently insufficient technical evidence and/or supporting infrastructure to support allocation, but there is significant potential based on their location and Central Bedfordshire's position right at the centre of the Cambridge-Milton Keynes-Oxford Arc.
23. The safeguarded land areas are therefore included to respond to proposals for future strategic infrastructure delivery; namely the realignment of the A1 or significant improvements through Central Bedfordshire, East West Rail, the Expressway and the expansion of Luton Airport. In each case these are either expected to enable development or in other cases they may mean that development is not feasible in a location due to the sterilisation of the land by the route or impact of the new infrastructure. All locations however based on initial technical assessment have potential for future development.

24. The Identified Areas for Future Growth are as follows:
- Land West of Luton
  - North, South and East of Tempsford (east of the A1)
  - Land East of Biggleswade (east of the allocated new village, south of Sutton and west of Dunton)
  - Aspley Guise (North of the Railway Line)

### **Employment**

25. The Plan seeks to deliver 24,000 new jobs through existing employment sites and also through the housing led mixed use growth locations set out above in order to meet local needs. This figure includes 6000+ jobs will be planned for at the following strategic locations to meet strategic demand in the key transport corridors for warehousing and logistics.
- A1 Corridor – Biggleswade South - Strategic Employment Area
  - M1 Junction 13 – Strategic Employment Area
  - M1 Junction 11a – Strategic Employment Area
  - RAF Henlow – opportunity for mixed use employment supporting the wider visitor economy and research and development sector.

### **Important Countryside Gaps**

26. A number of relatively sensitive and narrow gaps of undeveloped countryside outside of Green Belt where there is a risk of coalescence as a result of development pressure have been identified (see Appendix 5 of the Submission Draft Local Plan for locations). It is considered essential that the open nature of countryside in these gaps is maintained in order to retain the character of these settlements and prevent the potential loss of their individual identity. For example an Important Countryside Gap has been identified at Cranfield to prevent coalescence with Milton Keynes which is expanding to the west close to the authority boundary.
27. Whilst other policies in the Plan seek to prevent inappropriate development in the countryside generally and in Green Belt, it is considered that in some instances, incremental built development, which may otherwise be appropriate to a rural area, would cause the separate identity of settlements to be eroded or lost entirely. Four categories of Important Countryside Gap have therefore been determined. These are:
- Land where development has the potential to cause coalescence between existing settlements;
  - Land where development has the potential to cause the coalescence of 'ends' within a settlement;
  - Land where development has the potential to cause coalescence between existing settlements and the Identified Areas for Future Growth (paragraph 19);

- Land where development has the potential to cause coalescence as a result of strategic cross boundary proposals.

### **Consultation and Main Issues Identified**

28. At pre-submission stage (regulation 19) which ran from 11 January to 22 February, the consultation sought views on the site-specific allocations that have been identified and the accompanying policies in the document. Local plans must be positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and so those responding were asked to comment on whether they considered the Plan had met these tests of soundness.
29. A total of 6275 representations were submitted to the consultation with 442 in support, 1282 commenting and 4551 objecting. Subject to the authorisation of Council, all representations received, together with all of the evidence work will be submitted in full to the Secretary of State on 30<sup>th</sup> April 2018. The reason that the number of objections is still comparatively high is that this was the first formal opportunity to make comments on the small and medium allocations, as previously in the first consultation (summer 2017) they were just listed as sites that were still be considered.
30. The regulations also require the Council to provide a summary of main issues raised by the consultation on the pre-submission version of the Plan. The main issues centre around the scale of growth, the delivery rates of sites, the delivery of infrastructure, the impact on countryside/agricultural land, increase in traffic and the impact on heritage assets. It is considered that these issues have been adequately addressed by the supporting evidence for the Plan, but it is these issues that will form the basis of the 'matters and issues' that the Planning Inspector will identify for discussion at the hearing sessions. The main issues will also be summarised in the Consultation Statement published at submission.

### **Schedule of Proposed Modifications to the Plan**

31. Local Planning Authorities can propose changes to a plan following the Regulation 19 consultation. The Council has sought Counsel advice and determined that the modifications proposed are minor rather than main modifications. This means that they do not alter policy; rather in response to representations, they update matters where necessary, correct any errors or provide clarification as to how the Council intends to apply a particular policy.
32. Where minor changes are proposed, no further consultation is required. In addition, while it is helpful for clarity, it is not a requirement to prepare these changes in advance of submission.

33. The minor modifications are spread across the plan with some providing additional updated detail on infrastructure in relation to sites, others providing specific wording changes where requested by statutory consultees for compliance with national policy and guidance; but with the vast majority correcting minor errors or omissions. The schedule of minor modifications can be reviewed at Appendix A.

### **Reasons for Decision**

34. Producing a Local Plan is a priority for the Council for a number of reasons. The Government is clear that Local Authorities are expected to have up to date plans in place to guide development within their area to plan for the infrastructure, homes and jobs that our residents need.
35. This pre-submission version of the Plan sets out a number of proposed site allocations, which constitute a sustainable strategy informed by consultation and technical evidence gathered to date.
36. By failing to meet the date at which the NPPF is published as the deadline for submission, this authority area will have the new housing need figures imposed on it and will need to plan for these as well as any unmet need from neighbouring authorities. This could elongate the timeline significantly as brokering agreement with multiple neighbours on this issue could potentially prove very challenging.
37. Failure to submit a plan before this deadline would also risk a resulting loss of control of the process and speculative development with no prospect of maintaining a five year housing land supply in the face of an annual requirement of 2553 homes. Having a submitted Local Plan will mean that the Council retains control over where development should be located rather than it being delivered in an ad hoc way, sometimes without sufficient benefit to local communities

### **Council Priorities**

38. The Central Bedfordshire Local Plan, as an overarching planning policy document, has the potential to contribute to each of the Council priorities. The main focus of the document is “Enhancing Central Bedfordshire” through planning for the new homes, jobs and infrastructure the area needs while protecting the countryside. However, the strategy can also help contribute to creating stronger communities, improved educational attainment and promoting health and wellbeing, through the delivery of ‘walkable’ neighbourhoods, new open space and leisure facilities funded by developer contributions.

## Legal Implications

39. Once adopted the Local Plan will form part of the statutory Development Plan and will be used to determine planning applications. Until this happens the existing adopted plans will continue to set the planning framework. The Local Plan has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.
40. This submission stage is prescribed by Regulation 22 of these regulations and is the final stage in ensuring that the Plan is sound and robust and will meet the requirements of the regulations when it reaches Public Examination.

## Financial and Risk Implications

41. Other than staff costs already built in to the base budget, the main financial cost associated with producing this draft Local Plan are specialist consultant's costs in preparing technical studies. Costs are being met from within the Development Plan budget already approved by Council. Funding will be drawn down as required from the budget and Local Plan reserve. Approximately £180K was spent from the budget in 15/16 and £280K in 16/17 with £73,500 recouped via contributions from other Local Authorities in relation to joint work on the evidence base. In 17/18 these costs remained broadly similar with costs of £273K incurred.
42. The scale of the Council's investment should be seen in the context of the scale of new investment (new commercial and retail development as well as residential) into Central Bedfordshire that a Local Plan will enable. The cost of plan-making should also be seen against the cost of the alternative approach of fighting costly appeals against speculative development.
43. Failing to adopt a "sound" Plan could lead to a failure to deliver the required levels of housing, jobs and infrastructure proposed for growth and regeneration in the area in a planned way. This draft of the Plan has taken into consideration the soundness tests set out in the NPPF. These tests need to be complied with otherwise there is a risk that a planning inspector could find the Plan unsound. To help minimise this risk, the evidence base has been refreshed and specialist external advice sought on the robustness of the process, including an advisory visit with the Planning Inspectorate and engagement with the Department of Communities and Local Government (DCLG).
44. An internal officer Project Board which reviews risks and mitigation on a regular basis through a risk register has also been in operation throughout the lifespan of the Local Plan programme.

## **Sustainability**

45. The Local Plan is subject to a Sustainability Appraisal (SA), which promotes sustainable development through assessing the extent to which the emerging Plan, when judged against reasonable alternatives, will help to achieve environmental, economic and social objectives. Health and equality considerations have been integrated to ensure that these issues are also well represented in the assessment. The SA makes a varied appraisal, identifying mostly positive and neutral effects with some negative effects of the emerging approach.
46. Further detail through the SA work produced to support the pre-submission version of the Plan will help address some of the potential neutral or negative effects. The Council must consider the findings of the SA alongside the wider evidence base to inform decision-making in relation to the selection or rejection of alternatives and development of policy for the Local Plan. SA is an iterative and ongoing process that has been undertaken at each stage of plan-making.

## **Equalities Implications**

47. The Draft Plan has been the subject of a specific Equalities and Diversity Impact Assessment (EqIA). The assessment demonstrates that the draft Local Plan covers a broad range of issues and does not discriminate against protected groups. Overall, the Plan was mostly positive in terms of helping to advance equality of opportunity. However some key equality issues were identified including affordable housing, accessible housing and in relation to Gypsy and Traveller accommodation needs. The EqIA has therefore been revised and updated as the Plan policies have been updated to take account of these areas as a result of new evidence.

## **Conclusion and next Steps**

48. The submission Plan is the culmination of just over two years of extensive technical evidence gathering and analysis, underpinned by` consultation and community planning work. This consultation document is a robust strategy which meets legislative and policy requirements. Council is therefore asked to approve the Local Plan for submission to the Secretary of State.
49. Once submitted, the Examination process commences and a Planning Inspector is appointed. The inspector will determine what the main matters and issues should be and invite the Council and representors to respond formally to his/her questions before convening hearing sessions so that the evidence can be heard in public.

If the plan is determined to be 'sound', Council will be asked to adopt the Local Plan as the development plan for Central Bedfordshire.

## **Appendices**

**Appendix A:** Schedule of Proposed Minor Modifications

## **Background Papers**

The Central Bedfordshire Local Plan (Pre-submission Draft, January 2018)

Report author:

Connie Frost-Bryant, Head of Strategic Growth [connie.frost-bryant@centralbedfordshire.gov.uk](mailto:connie.frost-bryant@centralbedfordshire.gov.uk)

**Appendix A – Schedule of Minor Modifications to the Central Bedfordshire Local Plan (April 2018)**

Document	Chapter	Policy/Para	Change required	Proposed change	Reason for change
Local Plan	1	1.11	Section on 'pre-submission draft' and consultation section written in present tense. To be re-worded.		Update to current status
Local Plan	1	1.5 Partial Plan Review	Insert reference to Partial Plan Review being subject to full public participation		Clarity
Local Plan	1	para 1.7.4	Remove reference to Strategic Frameworks	.. And will continue to do so throughout the plan-making process. Central Bedfordshire has committed to actively engage with our neighbours throughout the Local Plan process and identify specific cross-boundary issues that need to be discussed. These discussions will form the foundation for the Statements of Common Ground...	Update to current status
Local Plan	2	2.3.2	Natural England suggest that re-use of brownfield land needs to make explicit that brownfield land will be brought forward for development provided that it is not of high environmental value.	<i>The Council will seek opportunities to maximise the use of suitable and available, previously developed or 'brownfield' land provided that it is not of high environmental value, before looking to sites within the Green Belt or green field sites elsewhere in Central Bedfordshire to accommodate future growth requirements'</i>	Clarity - representation from Natural England
Local Plan	4	4.1.1 A Vision for 2035	Clarify reference to natural environment, not just landscape	Replace "...enhanced high quality landscape" with "high quality natural environment"	Clarity
Local Plan	4	4.2 Visions and Objectives		SO3 - add following text at end of objective - "Seek to encourage developments that will result in a reduction in the number of heritage assets on the national Heritage at Risk Register (HAR)."	Clarity - representation from Historic England
Local Plan	4	4.2 Visions and Objectives		Add new bullet to SO3 - "A strategy for the conservation; protection and enhancement of the historic environment shall be developed and implemented. The strategy will include measures to mitigate any harmful impacts to the historic environment and shall use information derived from site specific heritage impact assessments;"	Clarity - representation from Historic England
Local Plan	4	4.2 Visions and Objectives		SO3 - replace 'heritage' with 'historic environment'	Clarity - representation from Historic England
Local Plan	4	4.2 Visions and Objectives - SO12	SO12 - Add reference to Biodiversity Opportunity Areas, Greensand Ridge NIA, AONB, and GI Plans.	addition of text to read "Encourage the development of wildlife corridors and networks to support objectives of the Nature Conservation Strategy, Rebuilding Biodiversity (Biodiversity Opportunity Areas and Networks), the NIA, AONB and Green Infrastructure Plans, and provide open spaces in line with the requirements identified in Central Bedfordshire's Leisure Strategy".	Clarity - representations including Greensand Trust and Wildlife Trust
Local Plan	5	5.4		Bullet 3 - replace 'heritage' with 'historic environment'	Clarity - representation from Historic England
Local Plan	6	6.6.2		Remove the word 'modest'	Clarity
Local Plan	6	SP2/SP2 supporting text	Add definition of what constitutes an 'out of date' policy		Clarity
Local Plan	6	Table 6.2	Figures to be updated to reflect the most recent Housing Trajectory	Figures to be added once available	Update required to reflect changes since January 2018
Local Plan	6	Table 6.3	Figures to be updated to reflect any changes/removals of proposed allocations	Figures to be added once available	Update required to reflect changes since January 2019
Local Plan	7	7.1.1	Reference to Trajectory is incorrect, it can be found in the HIS and not the SHLAA	Reword 'The delivery rates of existing housing commitments have already been determined and are set out within the housing trajectory in the Housing Implementation Strategy (HIS)'	Error
Local Plan	7	7.1.1	Amend text to acknowledge that the provision of infrastructure impacts on delivery.	Amend text '...taking into consideration competing sites, the provision of infrastructure, likely commencement....'	Clarity
Local Plan	7	7.3.1	Amend text to ensure Plan also refers to employment land monitoring	Add sentence at the end of 7.3.1  "The supply and development of employment land will also be monitored on an annual basis and the figures will be published in the AMR."	Omission
Local Plan	7	7.5 SP3	Addition of bullet making it a requirement that all development proposals brought forward at the identified strategic allocations should be accompanied by a Mineral Resource Assessment in accordance with Policy MSP11 of the Minerals and Waste Local Plan (January 2014)		Omission
Local Plan	7	7.7(a) SA1	Capacity figures in allocations should be expressed using 'approximately' not 'up to'	Change 'up to' to 'approximate' for capacity	Error
Local Plan	7	7.7(a) SA1	Add similar wording from HRN2 to North of Luton re Affordable Housing provision for Luton.	Add wording 'up to 30% affordable homes, subject to viability testing, to meet the needs of Central Bedfordshire and Luton residents'.	Clarity - change proposed following DfC Meeting

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Document	Chapter	Policy/Para	Change required	Proposed change	Reason for change
Local Plan	7	7.7(a) SA1	Clarify reference to 'heritage assets and their settings'	Insert "...heritage assets and their setting..." exact wording TBC	Clarity - representation from Historic England
Local Plan	7	7.7(a) SA1 (1c)	Point c starts with 'Provide' which doesn't make sense when read with the text under point 1.	reword ' <i>provision of the serviced land necessary</i> '	Error
Local Plan	7	7.7(a) SA1 (1d)	Point 1d should distinguish between 'community facilities AND retail' as these are separate	In para 1(d) Remove ' <i>including</i> ' and add comma	Clarity
Local Plan	7	7.7(a) SA1 (1d)	Para 1(d) refers to HQ2 in error - should be HQ3	Reference to ' <i>HQ2</i> ' in para 1(d) to change to ' <i>HQ3?</i> '	Error
Local Plan	7	7.7(a) SA1 (1f)	Para 1(f) refers to EE12 in error - should be EE13	Reference to ' <i>EE12</i> ' in para 1(f) change to ' <i>EE13</i> '	Error
Local Plan	7	7.7(a) SA1 (2)	Ensure that A6-M1 link road is described in all instances as a ' <i>strategic route</i> '.	2. ' <i>....appropriately designed strategic route to link....</i> '	Clarity
Local Plan	7	7.7(a) SA1 (2,3,4)	Add wording to state that proposals will give due consideration to the highways impacts in Luton. Exact wording to be confirmed.		Clarity - change proposed following DtC Meeting
Local Plan	7	7.7(a) SA1 (9)	Reword point on link road to reference ' <i>settings of heritage assets</i> '	<i>...AONB, Heritage assets and their settings, and biodiversity...</i>	Clarity - representation from Historic England
Local Plan	7	7.7(a) SA1(11?)	List heritage assets of interest, but bookend with "etc" to show list not exhaustive		Clarity - representation from Historic England
Local Plan	7	7.7(a) SA1(13)	SA1 differs to other strategic allocation policies in that it does not refer to capacity for both sewage treatment and within the sewer network and the timing of development. Update text to address this.	Suggested re-word to say ' <i>Foul drainage from the development shall be connected to the public sewerage network. The development shall demonstrate that there is adequate capacity in water recycling centre (sewage treatment works) and the foul sewerage network to serve the proposed development. Any application for planning permission shall detail any infrastructure upgrades where required and any necessary phasing arrangements as agreed by the relevant sewerage company;</i> '	Clarity - Representation from Anglian Water
Local Plan	7	7.7(b) SA2 (1c)	Point c starts with 'Provide' which doesn't make sense when read with the text under point 1.	reword ' <i>Provision of a suitable parcel of serviced...</i> '	Error
Local Plan	7	7.7(b) SE1	Clarify reference to heritage assets and their settings	Insert "...heritage assets and their setting..." (bullet point 5)	Clarity - representation from Historic England
Local Plan	7	7.7(b) SE1	List heritage assets of interest, but bookend with "etc" to show list not exhaustive		Clarity - representation from Historic England
Local Plan	7	7.7(b) SE1	Add reference to A6-M1 link road to say	Add text ' <i>delivery and design of this link road should have regard to any emerging proposals in relation to the M1-A6 strategic route.</i> '	Error
Local Plan	7	7.7(b) SE1	Add additional text to ensure the protection of the Chiltern Way is given due consideration.		Error
Local Plan	7	7.7(b) SE1	Suggested amendments and additions to policy to say no warehousing shall be occupied or logistics operations commenced until the rail connection, including signalling, sidings and locomotive run-round loop as required by Network Rail, has been constructed, commissioned and is fully operational.		Clarity
Local Plan	7	7.7(b) SE1	Add reference to strategic and integrated drainage solutions.	Similar wording to that in the SA allocations	Omission
Local Plan	7	7.7(c) SA2	Capacity figures in allocations should be expressed using 'approximately' not 'up to'	Change 'up to' to 'approximate' for capacity	Error
Local Plan	7	7.7(c) SA2	Clarify reference to 'heritage assets and their settings'	Insert "...heritage assets and their setting..." exact wording TBC	Clarity - representation from Historic England
Local Plan	7	7.7(c) SA2	List heritage assets of interest, but bookend with "etc" to show list not exhaustive		Clarity - representation from Historic England
Local Plan	7	7.7(c) SA2	Add requirement for the preparation of Mineral Resource Assessment.	Shall be accompanied by a Mineral Resource Assessment in accordance with Policy MSP11 of the Minerals and Waste Local Plan (January 2014)	Clarity
Local Plan	7	7.7(c) SA2	change policy to say ' <i>up to 40 ha</i> ' of employment land rather than requirement	Replace ' <i>a minimum of</i> ' with ' <i>up to</i> '	Clarity
Local Plan	7	7.7(c) SA2	Amendments to be made to map boundaries as they need updating (see developers rep, Brogborough PC rep, and check with Waterway)	update to map required	Clarity
Local Plan	7	7.7(c) SA2 (1d)	Point 1d should distinguish between 'community facilities AND retail' as these are separate	In Para 1d Remove ' <i>including</i> ' and add comma	Clarity
Local Plan	7	7.7(c) SA2 (1d)	Policy refers to HQ2 in error - should be HQ3	Reference to ' <i>HQ2</i> ' in para 1d change to ' <i>HQ3?</i> '	Error
Local Plan	7	7.7(c) SA2 (1f)	Policy refers to EE12 in error - should be EE13	reference to ' <i>EE12</i> ' in para 1f change to ' <i>EE13</i> '	Error
Local Plan	7	7.7(c) SA2 (4)	Do not abbreviate 'GCN'	Change GCN to Great Crested Newts	Error
Local Plan	7	7.7(d) SE2	List heritage assets of interest, but bookend with "etc" to show list not exhaustive and clarify reference to heritage assets and their settings		Clarity - representation from Historic England

**Appendix A – Schedule of Minor Modifications to the Central Bedfordshire Local Plan (April 2018)**

Document	Chapter	Policy/Para	Change required	Proposed change	Reason for change
Local Plan	7	7.7(d) SE2	Add reference to strategic and integrated drainage solutions.	Similar wording to that in the SA allocations	Omission
Local Plan	7	7.7(d) SE2	Add wording relating to level crossing at Ridgmont to say that a scheme or strategy will be required to resolve concerns raised by Network Rail in relation to increased traffic over the level crossing.		Omission
Local Plan	7	7.7(d) SE2	Add to main bullet points a requirement to seek to improve the station facilities and provide access to the station.		Omission
Local Plan	7	7.7(d) SE2	Add text relating to Travel plans as an integral requirement		Omission
Local Plan	7	7.7(d) SE2 (2)	Add B2 to the Policy to cover the full range of activities that typically occur at strategic distribution sites.		Omission
Local Plan	7	7.7(e) SA3	Capacity figures in allocations should be expressed using 'approximately' not 'up to'	Change 'up to' to 'approximate' for capacity	Error
Local Plan	7	7.7(e) SA3	Clarify reference to 'heritage assets and their settings'	Insert "...heritage assets and their setting..." exact wording TBC	Clarity - representation from Historic England
Local Plan	7	7.7(e) SA3	List heritage assets of interest, but bookend with "etc" to show list not exhaustive		Clarity - representation from Historic England
Local Plan	7	7.7(e) SA3 (1d)	Policy refers to HQ2 in error - should be HQ3	Reference to 'HQ2' in para 1d change to 'HQ3?'	Error
Local Plan	7	7.7(e) SA3 (1f)	Policy refers to EE12 in error - should be EE13	Reference to 'EE12' in para 1f change to 'EE13'	Error
Local Plan	7	7.7(e) SA3 (7)	Remove point 7 no designated assets	Delete text to reword 'The development shall seek to mitigate the degree of harm to the significance of all designated heritage assets...'	Clarity
Local Plan	7	7.7(e) SA3 (9)	Re-word to point 9 to clarify reference to pedestrian and cycle connections in general rather than current reference to rights of way.	<i>the development shall integrate and connect to existing pedestrian and cycle connections within and adjoining...</i>	Clarity
Local Plan	7	7.7(f) SA4	Need for additional text to acknowledge proximity to level-crossings and require contributions for closure of Lindsells level crossing.	Exact text TBC but something similar to "Need to assess the impact development will have on the level crossing and propose appropriate mitigation and contributions..."	Omission - representation from Network Rail
Local Plan	7	7.7(f) SA4	Capacity figures in allocations should be expressed using 'approximately' not 'up to'	Change 'up to' to 'approximate' for capacity	Error
Local Plan	7	7.7(f) SA4	Clarify reference to 'heritage assets and their settings'	Insert "...heritage assets and their setting..." exact wording TBC	Clarity - representation from Historic England
Local Plan	7	7.7(f) SA4	List heritage assets of interest, but bookend with "etc" to show list not exhaustive		Clarity - representation from Historic England
Local Plan	7	7.7(f) SA4	Addition of bullet making it a requirement any application for development is accompanied by a Mineral Resource Assessment in accordance with Policy MSP11 of the Minerals and Waste Local Plan (January 2014)		Omission
Local Plan	7	7.7(f) SA4 (1b)	Point 1b starts with 'Provide' which doesn't make sense when read with the text under point 1.	reword 'Provision of a commensurate...'	Error
Local Plan	7	7.7(f) SA4 (1c)	Point 1c should distinguish between 'community facilities AND retail' as these are separate	Remove 'including' and add comma	Clarity
Local Plan	7	7.7(f) SA4 (1c)	Para 1c refers to HQ2 in error - should be HQ3	reference to 'HQ2' in para 1c, change to 'HQ3?'	Error
Local Plan	7	7.7(f) SA4 (1e)	Para 1e refers to EE12 in error - should be EE13	reference to 'EE12' in para 1c change to 'EE13'	Error
Local Plan	7	7.7(f) SA4 (9)	The plan refers to Sustainable drainage systems (SUDS) through the plan. In some locations SUDS is referred to a Sustainable Urban Drainage Systems which is an old term for SUDS. Suggestion is to be consistent and use Sustainable drainage systems (SUDS) through the plan.	Delete "sustainable urban drainage systems" and replace with "sustainable drainage systems"	Error
Local Plan	7	7.7(f) SA4, (9)	Policy SA4, point 9 refers to the need to 'mitigate' flood risk through the use of SuDS. For consistency with policies SA1, SA2 and SA3, and with NPPF Paragraph 100, we recommend that this should be amended to 'reduce'.	Amend sentence: '... ensure adequate measures to reduce flood risk...'	Error
Local Plan	7	7.7(g) SE3	List heritage assets of interest, but bookend with "etc" to show list not exhaustive and clarify reference to heritage assets and their settings		Clarity - representation from Historic England
Local Plan	7	7.7(g) SE3	Add reference to strategic and integrated drainage solutions	Similar wording to that in the SA allocations	Omission
Local Plan	7	7.7(g) SE3	Site immediately north of Newspring borehole and within a groundwater source protection zone (SPZ). SE3 does not reference the need to consider the potential risk of pollution to this groundwater source.	Suggested addition 'A detailed groundwater risk assessment will be required to demonstrate no adverse impact from polluting activities on groundwater sources. Proposals will be supported where it can be demonstrated to the satisfaction of the Council in consultation with the water undertaker that pollution to existing groundwater sources can be avoided or suitably mitigated.'	Omission - Representation from Anglian Water
Local Plan	7	7.7(h) SE4	List heritage assets of interest, but bookend with "etc" to show list not exhaustive and clarify reference to heritage assets and their settings		Clarity - representation from Historic England

**Appendix A – Schedule of Minor Modifications to the Central Bedfordshire Local Plan (April 2018)**

Document	Chapter	Policy/Para	Change required	Proposed change	Reason for change
Local Plan	7	7.7(h) SE4	Add reference to strategic and integrated drainage solutions	Similar wording to that in the SA allocations	Error
Local Plan	7	7.7(h) SE4		Add text after 3rd para ' <i>...unique location, and consider the existing aviation uses on the site.</i> '	Clarity
Local Plan	7	7.7(h) SE4	The development brief should include proposals to require improvement to the railway station at Arlesey.		Omission - representation from Network Rail
Local Plan	7	7.7(h) SE4	Wording to be added acknowledging the effect development could have on the surrounding network and the impact on the A659/A600 towards Hitchin.	Add text to second bullet point ' <i>deliver necessary improvements to the road network maintaining suitable access to the site and ensuring that any impact on the surrounding network, including the A600/A659, is appropriately mitigated</i> '	Clarity - change proposed following DtC Meeting
Local Plan	7	7.8 HA1 (multiple sites)	Under Additional Policy Requirements add text under relevant sites referring to additional flood risk work required - this is to be taken from SFRA level 2		Omission - representation from Environment Agency
Local Plan	7	7.8 HA1 (multiple sites)	Site areas to updated to ensure they correspond with GIS.	Updated measurements to be added	Error
Local Plan	7	7.8 HAS01/02	HAS01 and HAS02 to have requirement added to ensure that they are brought forward together		Error
Local Plan	7	7.8 HAS04	Need to clarify the replacement of pitches and associated facilities HAS04 ( needs linkage with Barton FC) - add additional policy requirement 'replacement of equivalent or better sport pitches'	Add text ' <i>It must be demonstrated that replacement football pitches and ancillary facilities (of equivalent or better quality) will be delivered within appropriate timescales.</i> '	Omission
Local Plan	7	7.8 HAS05	Add policy requirement for serviced land (2.1ha) for a new lower / primary school		Omission
Local Plan	7	7.8 HAS06	Need for additional text to reference land and contributions required for closure of Lindsells level crossing.	Exact text TBC but something similar to "Need to assess the impact development will have on the level crossing and propose appropriate mitigation and contributions, including land contributions..."	Omission - representation from Network Rail
Local Plan	7	7.8 HAS09	Add policy requirement for provision of land to enable school expansion (0.6ha)		Omission
Local Plan	7	7.8 HAS11	Boundary needs changing (land ownership revised)	Site boundary to be re-drawn and capacity / site area updated to reflect revised land ownership plan.	Change required - Representation from land owner
Local Plan	7	7.8 HAS15	Add policy requirement for provision of land to enable school expansion (0.6ha)		Omission
Local Plan	7	7.8 HAS17	HAS17 – extra policy requirement for Flitwick woods visitor management	<i>Site design to incorporate landscape buffering to Flitwick Wood and views towards Steppingley. Regard should be had to managing increased visitor pressure on Flitwick Wood to ensure that there is no detriment to habitat or species present. Woodland planting....'</i>	Omission
Local Plan	7	7.8 HAS17		Amend text ' <i>...Flitwick Wood to safeguard the views to and from Steppingley</i> '	Clarity
Local Plan	7	7.8 HAS20	Add policy requirement for serviced land (2.1ha) for a new lower / primary school		Omission
Local Plan	7	7.8 HAS23	Add policy requirement for provision of land to enable school expansion (0.61ha)		Omission
Local Plan	7	7.8 HAS26	Add policy requirement for provision of land to enable school expansion (0.5ha)		Omission
Local Plan	7	7.8 HAS30/HAS31	HAS30 and HAS31 should have similar requirements in terms of ROW?	Add wording ' <i>Design will need to be complimentary to adjoining allocation and work with the adjoining allocation to ensure that the Right of Way to the east of site is enhanced.</i> '	Error
Local Plan	7	7.8 HAS30/HAS31	Strengthen requirement for GI buffering to railway line.	Re-word ' <i>...Landscaping, buffering and noise mitigation will be required for the railway edge</i> '	Clarity
Local Plan	7	7.8 HAS32	Site area is incorrect.	Update site area to 7.29ha and cross check with GIS plan	Error
Local Plan	7	7.8 HAS36	Error in site capacity, to update to clarify proposed capacity as 25 dwellings	Update capacity to 25 dwellings	Error
Local Plan	7	7.8 HAS44	Add policy requirement for serviced land (2.1ha) for a new lower / primary school		Omission
Local Plan	7	7.8 HAS46	calculated number of dwellings is incorrectly listed. This has been calculated on 35dph not 30dph (LP and SHLAA)	Update approx. density to say 35dph	Omission
Local Plan	7	7.8 HAS46	Add requirement for a comprehensive development of whole site, and clarity that a piecemeal development would not be acceptable		Omission
Local Plan	7	7.9 (7.10) SA5	Clarify that Houghton Regis is a commitment and not an allocation	Change ' <i>Houghton Regis North Strategic Allocation</i> ' to ' <i>Houghton Regis North Strategic Commitment</i> '	Error
Local Plan	7	7.9 (7.10) SA5	Add similar wording from HRN2 to HRN1 re Affordable Housing provision for Luton. Exact wording to be confirmed.	Add wording ' <i>up to 30% affordable homes, subject to viability testing, to meet the needs of Central Bedfordshire and Luton residents.</i> '	Clarity - change proposed following DtC Meeting
Local Plan	7	7.9 (7.10) SA5	Amend text to refer to exact number of homes we have permission for, not a range		Error
Local Plan	7	7.9.3	Potential typo' The identified land area as respond to' - re-word to clarify	Reword ' The identified land responds to...'	Error
Local Plan	8	SP5	Insert sentence acknowledging that Gaps have wider GI network function and that the Council will support applications which improve/enhance/contribute to these functions		Clarity

**Appendix A – Schedule of Minor Modifications to the Central Bedfordshire Local Plan (April 2018)**

Document	Chapter	Policy/Para	Change required	Proposed change	Reason for change
Local Plan	8	SP5		Second bullet - delete "...and will resist any extension to built up areas..." and replace with permission will be refused for development...."	Clarity
Local Plan	8	SP5		Third para - delete "unallocated development" and replace with "any new development that would promote the visual or physical coalescence of nearby settlements."	Clarity
Local Plan	10	10.3.1	Update text to take account of cumulative impact.	Bullet 2, expand by adding "in conjunction with any existing provision" after "number of pitches and plots"	Clarity
Local Plan	11	11.1.5	Clarify annual requirement as 1600 no 1684	Amend text '...this amounts to 1600 dwellings per annum...'	Error
Local Plan	11	11.4.8		Add after 'affordable housing provision' add 'or alternative delivery mechanisms to secure on-site proviso of 30% affordable housing'	Clarity
Local Plan	11	11.4.9	Typo - should say 'viability assessment will...'	Amend text 'a viability assessment will determine...'	Error
local Plan	11	11.8.1	Incorrect policy reference - should be SP8 not SP7	Re-word 'The pitch and plot requirements for Gypsies and Travellers and Travelling Showpeople are set out in Strategic Policy SP8 at the head of this Plan...'	Error
Local Plan	11	H1	Need flexibility as there are many variables according to each individual application.	Insert word into the first paragraph i.e.: an "appropriate" mix of housing types and sizes... New sentence: "The housing mix must have regard to the latest housing needs, the nature of the site and its surroundings, and any other site-specific considerations such as viability".	Clarity
Local Plan	11	H2	Should therefore not apply the higher level Part M4(3) to market homes.	Delete 'Require all new build housing to deliver at least 5% Category 3, Requirement M4 (3) wheelchair accessible homes (or any new or revised regulations that revoke or modify the Building Regulations).'	Error
Local Plan	11	H3	Explain whether the viability of delivering the requirements set out within Policy H3 has been fully considered	bullet 3 - add "The proportions of which will be guided by viability considerations on a site-by site basis" at the end of the sentence.	Omission
Local Plan	11	H3	There will be many examples, such as flatted developments, and sites where the location or character of the area would make the provision of bungalows entirely unsuitable.	Bullet 6 - add "The onus is on the applicant to justify why this is not possible on a site by site basis" at the end of the sentence.	Omission
Local Plan	11	H4	Suggest removal of third bullet point to avoid duplication - It is already sufficiently covered in policy H2	Delete 3rd bullet point that relates to NDSS	Clarity
Local Plan	11	H5		first eight bullet points - remove "first" so reads '....conform to the eight criteria above....'	
Local Plan	11	H6	To clarify that a commuted sum payment will only be considered on the basis of viability. Applicants cannot 'pay-off' the obligation.	Change the beginning of the last bullet point to "In cases where viability evidence is demonstrated..."	Clarity
Local Plan	11	H7	Clarify that delivery of serviced plots will be subject to viability considerations, to be consistent with other LP policies	add bullet point to policy(between 2nd and 3rd bullet). "Delivery of serviced plots will be subject to viability considerations".	Clarity
Local Plan	11	H7	Clarify distinction between serviced plots for self build and Affordable Housing	Add wording to penultimate bullet point: "Serviced plots for the delivery of Self and Custom build housing will form part of the market delivery".	Clarity
Local Plan	11	H8	Add text requiring applications to avoid areas (including those with noise or air quality issues or are in areas at high risk of flooding) that would have a detrimental impact on the health and well-being of any Gypsy and Travellers that may locate there.		Clarity - representation from Environment Agency
Local Plan	11	Policy H9	Add text requiring applications to avoid areas (including those with noise or air quality issues or are in areas at high risk of flooding) that would have a detrimental impact on the health and well-being of any Gypsy and Travellers that may locate there.		Clarity - representation from Environment Agency
Local Plan	12	12.1.6	Ensure that A6-M1 link road is described in all instances as a 'strategic route'.		Clarity
Local Plan	12	12.7.5	Should reference EMP3 not EMP4	Correct policy ref: 'Policy EMP3 applies only to sites that are outside of the Green Belt'.	Error
Local Plan	12	EMP4	Add text to broaden and strengthen policy, recognising that agriculture and forestry are still significant in economic and land-use terms.		
Local Plan	13	Table 13.1	Should reference settlement hierarchy not SP7/SP8	Replace 'See Policy SP7' and 'See Policy SP8' with 'See Settlement Hierarchy Table in Chapter 9'	Error
Local Plan	14	14.6	Add new para to this section about railways, the upgrade of existing railway stations for example to support DDA compliance, provision of cycle parking and the closure and replacement of unsafe railway level crossings with one or more safe crossings.		Omission - representation from Network Rail
Local Plan	14	14.3.2	Add reference to inappropriate routing to unsafe level crossings	Add additional bullet point to communities: 'inappropriate routing of all users to unsafe level crossings.'	Omission - representation from Network Rail
Local Plan	14	14.4.2	Ensure plan considers quality of pedestrian, cycle and public transport links	Amend third bullet to read: 'Increase safe and convenient connectivity and accessibility particularly through sustainable travel.'	Omission
Local Plan	14	14.4.2		Amend fifth bullet to read: 'Provide additional capacity where required and upgrade or replace existing infrastructure if necessary.'	Omission - representation from Network Rail

**Appendix A – Schedule of Minor Modifications to the Central Bedfordshire Local Plan (April 2018)**

Document	Chapter	Policy/Para	Change required	Proposed change	Reason for change
Local Plan	14	T1	Add reference to routes needing to be safe	Amend bullet 2 to read: <i>'Comprehensive, convenient and safe pedestrian and cycle links to schools, local employment and service provision'</i>	Clarity
Local Plan	14	T1	Formatting error - distance to bus and rail should be a bullet point	Change para four, starting "suitable bus or rail..." into a bullet and add to the list of bullets in the paragraph above.	Error
Local Plan	14	T2	Amend 3rd bullet to add reference to Bridle paths		Clarity
Local Plan	14	T5		Amend bullet point 'university sites' to read ' <i>Education Facilities, including universities</i> '	Clarity
Local Plan	15	15.12	Add reference to the Surface Waters Plan and need for further engagement with the IDB.		Omission - from representation from IDB
Local Plan	15	15.1.1		Replace ' <i>heritage</i> ' with ' <i>historic environment</i> '	Clarity - representation from Historic England
Local Plan	15	15.1.3		First sentence, after word ' <i>environment</i> ' insert " <i>(natural, built and historic)</i> "	Clarity - representation from Historic England
Local Plan	15	15.15.2	Note Council supports the principle of designating Local Green Spaces through Neighbourhood Plans, but this should be caveated with "where a clear and robust methodology consistent with Government guidance has been followed".	The Council supports the principle of designating Local Green Space through Neighbourhood Plans where a clear and robust methodology consistent with Government guidance has been followed	Clarity - representation from Greensand Trust
Local Plan	15	15.4.4	Inclusion of wording for emerging district level GCN licence	Add the following to 15.4.4: ' <i>A District Level Licence for GCN in Central Bedfordshire is currently being prepared. The aim of this licence is to reduce delays, costs and uncertainty for developers whilst providing strategic habitat compensation to improve long-term nature conservation for Great Crested Newts</i> '	Omission - from representation from Natural England
Local Plan	15	15.5.2		reference to 16.10 incorrect, should read 15.10	error
Local Plan	15	15.6.1		replace " <i>historic and cultural heritage</i> " with " <i>the historic environment</i> ", and add word " <i>that</i> " they provide	Clarity - representation from Historic England
Local Plan	15	15.6.6		After " <i>tranquillity</i> " add " <i>and the historic environment.</i> "	Clarity - representation from Historic England
Local Plan	15	15.6.9		Replace " <i>be of historic or cultural interest</i> " with " <i>have historic environment interest.</i> "	Clarity - representation from Historic England
Local Plan	15	15.6.9		Final bullet, replace " <i>historical</i> " with " <i>historic environment interest</i> "	Clarity - representation from Historic England
Local Plan	15	15.7.6	Clarify that further guidance on tranquillity will be produced in due course	amend last sentence: ' <i>Further guidance on assessment of tranquillity and mitigation will be produced in due course</i> '	Clarity
Local Plan	15	EE1		First sentence of paragraph 1 ' <i>Proposed development...</i> '	Clarity -Natural England recommendation
Local Plan	15	EE1	The plan refers to Sustainable drainage systems (SUDS) through the plan. In some locations SUDS is referred to a Sustainable Urban Drainage Systems which is an old term for SUDS. Suggestion is to be consistent and use Sustainable drainage systems (SUDS) through the plan.	Amend wording in Policy EE1 delete " <i>sustainable urban drainage systems</i> " and replace with " <i>sustainable drainage systems</i> "	Error
Local Plan	15	EE1		First sentence, after word ' <i>infrastructure assets</i> ' insert " <i>(both natural and historic)</i> "	Clarity - representation from Historic England
Local Plan	15	EE1		Second para, after ' <i>biodiversity</i> ', insert ' <i>the historic environment</i> '	Omission - representation from Historic England
Local Plan	15	EE11	Policy should require protection and provision of tow and riverside paths	Bullet 1, after 'and biodiversity, including where appropriate the provision of new tow and riverside paths.'	Omission
Local Plan	15	EE13		Final para, replace "heritage" with " <i>historic environment</i> "	Clarity - representation from Historic England
Local Plan	15	EE14		Rename policy " <i>...for Minerals and Waste Restoration</i> "	Clarity
Local Plan	15	EE14		New bullet " <i>Pay due regard to the historic environment, particularly in relation to the setting of any heritage assets (whether designated or non-designated) affected by the development proposals</i> ".	Omission - representation from Historic England
Local Plan	15	EE3	3rd paragraph, 2nd bullet point, inclusion of Roadside Nature Reserves	Add bullet point to list under bullet point 2 ' <i>Roadside Nature Reserves</i> '	Omission
Local Plan	15	EE3	Add additional wording on impact on European designated sites as suggested by Natural England.	Natural England advises that the following additional policy wording, or similar, is included: <i>'Developments that are likely to have an adverse effect, either alone or in combination, on European designated sites must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoiding or mitigating against impacts where identified. Mitigation may involve providing or contributing towards a combination of the following measures:</i> <i>i. Access and visitor management measures within the SAC;</i>	Omission - from representation from Natural England

**Appendix A – Schedule of Minor Modifications to the Central Bedfordshire Local Plan (April 2018)**

Document	Chapter	Policy/Para	Change required	Proposed change	Reason for change
				<p>ii. Improvement of existing greenspace and recreational routes;</p> <p>iii. Provision of alternative natural greenspace and recreational routes;</p> <p>iv. Monitoring of the impacts of new development on European designated sites to inform the necessary mitigation requirements and future refinement of any mitigation measures.</p> <p>v. other potential mitigation measures to address air pollution impacts e.g. emission reduction measures, on site management measures.'</p>	
Local Plan	15	EE3	Policy to be strengthened by inclusion of the following points: Conserve and enhance the network of habitats, species and sites (both statutory and non-statutory) of international, national and local importance commensurate with their status and give appropriate weight to their importance; Avoid negative impacts on biodiversity and geodiversity, mitigate unavoidable impacts and as a last resort compensate for residual impacts; and Deliver a net gain in biodiversity where possible, by creating, restoring and enhancing habitats and enhancing them for the benefit of species.	Precise wording to be confirmed	Clarity -Natural England recommendation
Local Plan	15	EE5		inclusion of wording, 3rd paragraph, 1st bullet point '...surrounding landscape, <b>historic environment</b> and existing settlement form.'	Clarity - representation from Historic England
Local Plan	15	EE5		After " <i>tranquillity</i> " add " <i>and the historic environment.</i> "	Clarity - representation from Historic England
Local Plan	15	EE6		Bullet 2, after " <i>biodiversity</i> " add " <i>impact on the historic environment,</i> "	Omission - representation from Historic England
Local Plan	15	EE7		first paragraph inclusion of wording '... permission for major developments <b>in these areas ...</b> '	Clarity
Local Plan	15	EE9	Rep from Forest of Marston Vale Trust advices that wording must be consistent with BBC wording to meet DTC requirements.	Replace term ' new buildings' with 'development proposals'	Clarity
Local Plan	16	16.7.2	recommended additional wording on foul drainage	Include additional wording in 16.7.2.: <i>Foul drainage should be connected to the mains sewer if the distance from the development is within 30 metres of less of a main sewer (multiplied by the number of dwellings). Where it has been satisfactorily demonstrated that connection to the mains sewer is not possible, then irrespective of planning approval, under the Environmental Permitting Regulations 2016 any discharge of sewage or trade effluent made to either surface water or groundwater will need to be registered as an exempt discharge activity or hold a permit issued by the Environment Agency'</i>	Omission
Local Plan	16	16.7.3	Thames Water want amended wording for clarity.	Proposed new text to replace paragraph 16.7.3: " <i>The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the Water and Sewerage Company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.</i> "	
Local Plan	16	CC2		Replace ' <i>heritage assets</i> ' with ' <i>the historic environment</i> '	Omission - representation from Historic England
Local Plan	16	CC3, bullet 7	Policy is contradictory as on one hand betterment is being sought, yet in another only the pre-development rates can be achieved. The policy is inconsistent with the evidence in the Level 2 SFRA. The SFRA states that Sustainable Drainage Systems (SuDS) should ensure that the development achieves a reduction in greenfield run-off rates and reduce existing downstream risk, whereas Policy CC3 only requires surface water runoff to be managed to pre-development rates and volumes. Suggest that the following wording change to CC3, bullet point 7.	Make proposed change to wording CC3, bullet point 7: ' <i>Surface water runoff is managed to give priority to the use of SuDS, reducing overall flood risk, through the reduction in discharge rates and volumes to pre-development levels for previously developed sites, and to reduce discharge rates and volumes for greenfield sites. Discharge locations must have capacity to receive all foul and surface water flows from the development.</i> '	Clarity
Local Plan	16	CC4, bullet 1	We advise that a requirement to protect and enhance priority and protected species such as otter and water vole is added to ensure that the policy is sound and compliant with paragraph 117 of the NPPF.	Amend CC4, bullet 1:  <i>Conserve, and where possible, enhance the ecological and flood storage value of the water environment, including the protection and enhancement of priority and protected species such as otter and water vole;</i>	Clarity - representation from Natural England
Local Plan	16	CC5	The Plan should seek developers to provide betterment, such that they reduce flood risk rather than simply replicate pre-development conditions, should also refer to the partner RMAs and the requirements of site specific assessment of flood risk being agreed with them.	Recommend change to policy CC5 – to reflect wording of the SFRA report: ' <i>SuDS should ensure that post-development surface water run-off rates are attenuated to achieve a reduction in greenfield run-off rates and reduce existing downstream risk. This may include consideration of "off-site" solutions</i> '	Clarity
Local Plan	16	CC6: bullet 1	Suggest amending wording to ensure terminology is correct.	Amend first bullet as follows: " <i>adequate water supply resources are is available, or can be provided in time to serve the development, and existing</i>	Clarity

**Appendix A – Schedule of Minor Modifications to the Central Bedfordshire Local Plan (April 2018)**

Document	Chapter	Policy/Para	Change required	Proposed change	Reason for change
				<i>water resources will be safeguarded from the potential impacts of development."</i>	
Local Plan	17	17.5.12		Add "(built, natural and historic)" after "environmental impact", and new sentence at end of para: "However, such developments can also have an adverse impact on the historic environment and in particular the setting of heritage assets (both designated and non-designated)."	Omission - representation from Historic England
Local Plan	17	17.5.13		Add "(including the impact on the historic environment)" after words "wider landscape"	Omission - representation from Historic England
Local Plan	17	HQ1	Add wording on designing for healthy lifestyles to Policy HQ1		Omission - representation from Sport England
Local Plan	17	HQ1: High Quality Development		Bullet 6, add words "existing built, natural and historic" before "environment"	Omission - representation from Historic England
Local Plan	17	HQ2	Correct typo in policy title	...Community Infrastructure Levy'	Error
Local Plan	17	HQ4	Add reference to Leisure Strategy in supporting text - similar to 15.14 (EE13)		Clarity
Local Plan	18	18.4		Rename section "18.4 Listed Buildings, Conservation Areas and Built Heritage"	Omission - representation from Historic England
Local Plan	18	18.7		Add new section "18.7 Built Heritage"  "18.7.1 In addition to the 1,938 Listed Buildings Central Bedfordshire's historic market towns, villages and landscapes contain a significant number of distinctive buildings and structures which are not offered statutory protection. Many of these buildings are recorded on the Historic Environment Record and include: vernacular cottages, farm houses, town houses, artisan houses, barns, onion sheds, model farms, and watermills. These buildings usually have few architectural pretensions and are simple in form and detailing. Their building materials were generally sourced from the locality. The Council recognises the need to conserve and enhance all of these important features, which make up an essential component of the character of the area.  18.7.3 Applications that affect Listed Buildings and Conservation Areas will need to be accompanied by a Built Heritage Statement. On some occasions applications that affect non-designated buildings and structures will need to be accompanied by a Built Heritage Statement. Prospective developers should contact the Council's specialist advisors in order to establish whether a Built Heritage Statement should be submitted as part of any planning application".	Omission - representation from Historic England
Local Plan	18	18.1.2		Replace "Heritage@Risk" with "Heritage at Risk"	Clarity - representation from Historic England
Local Plan	18	18.1.5		Add "a heritage asset holds" after words "degree of significance"	Clarity - representation from Historic England
Local Plan	18	18.2.1		Replace "if there is a need for a field evaluation of this resource prior to the submission of a planning application" with "the type of information about archaeological resource that will be required to be submitted as part of a planning application".	Clarity - representation from Historic England
Local Plan	18	18.2.2		First sentence, replace "survey" with "assessment"	Clarity - representation from Historic England
Local Plan	18	18.2.4		After last sentence add "Developments that will result in the destruction of non-designated archaeological earthworks will not generally be supported".	Clarity - representation from Historic England
Local Plan	18	18.3.1		Replace "There are also a number of undesignated historic parks" with "There are also many undesignated historic parks"	Clarity - representation from Historic England
Local Plan	18	18.3.1		After "...across Central Bedfordshire" add "and these are recorded in the Historic Environment Record".	Clarity - representation from Historic England
Local Plan	18			Rewrite "Applications that affect registered parks and gardens will need to be accompanied by a Historic Park and Gardens Heritage Statement. On some occasions applications that affect non-designated historic parks and gardens will need to be accompanied by a Historic Parks and Gardens Statement. Prospective developers should contact the Council's specialist advisors in order to establish whether a Historic Park and Gardens Heritage Statement should be submitted as part of any planning application".	Clarity - representation from Historic England
Local Plan	18	18.3.2			
Local Plan	18	18.5.1		Revise first sentence to read "When considering applications for Listed Buildings (including for change of use); the repair, renovation, alteration and	Clarity - representation from Historic England

**Appendix A – Schedule of Minor Modifications to the Central Bedfordshire Local Plan (April 2018)**

Document	Chapter	Policy/Para	Change required	Proposed change	Reason for change
				<i>extension of should not be at the expense of its the building's intrinsic special interest and significance".</i>	
Local Plan	18	18.5.2		In cases where Listed Buildings have become vacant and derelict, there is a presumption in favour of their retention. Consent to demolish will be wholly exceptional; only allowed if all other options have been thoroughly explored and it is demonstrated that the loss is necessary to deliver substantial public benefits.	Clarity - representation from Historic England
Local Plan	18	18.5.2		Delete " <i>it is demonstrated that the loss will be compensated by substantial public benefits</i> ".	Clarity - representation from Historic England
Local Plan	18	H3		Rename Policy " <i>Listed Buildings, Conservation Areas and Built Heritage</i> "	Clarity - representation from Historic England
Local Plan	18	H3		Delete bullets 3 - 6 and replace with " <i>Development proposals that affect Listed Buildings or Conservation Areas or their settings must be accompanied by a Built Heritage Statement. The Built Heritage Statement must:</i>  <ul style="list-style-type: none"> <li>• Describe the significance of the heritage assets and their settings that will be affected by the development; and</li> <li>• Assess the level of impact that the development proposals will have on those assets including where necessary an assessment of the impact of the development proposals on their setting.</li> </ul> <i>Exceptions will be made where advice from the Council's specialist advisors indicates a Built Heritage Statement is not necessary.</i>  <i>Development that will result in a reduction in the number of built heritage assets on the Heritage at Risk Register will be encouraged."</i>	Clarity - representation from Historic England
Local Plan	18	HE1		First sentence after words "assets" add " <i>(whether designated or non-designated)</i> "	Clarity - representation from Historic England
Local Plan	18	HE1		End of bullet 1 add " <i>and (if appropriate) their settings</i> "	Clarity - representation from Historic England
Local Plan	18	HE1		New para after " <i>...of the development</i> " stating " <i>Development proposals that will result in the total loss of archaeological heritage assets or which cause substantial harm to the significance of archaeological heritage assets or their settings (whether designated or non-designated), will be refused unless it can be demonstrated that the harm or loss is necessary to achieve substantial public benefits that would outweigh the harm or loss of significance</i> ".	Clarity - representation from Historic England
Local Plan	18	HE2		Second bullet - delete and replace with " <i>Assess the level of impact that the development proposals will have on those assets including where necessary an assessment of the impact of the development proposals on their setting</i> ".	Clarity - representation from Historic England
Local Plan	18	HE2		Final para, delete and replace with " <i>Development proposals that will degrade the character and appearance of a Registered Park and Garden or which will cause substantial harm to the significance of a Registered Park and Garden or its setting, will be refused unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that would outweigh the harm</i> ".	Clarity - representation from Historic England
Local Plan	19	DC1	No ref to date building constructed. Add text to specify buildings constructed prior to 2018		Omission
Local Plan	19	DC2	Omission to Policy regarding replacement temporary dwellings, mobile homes, caravans which will not be allowed.	Add wording: ' <i>Planning Permission will not be granted for the replacement of temporary dwellings, mobile homes, caravans or other dwellings constructed of short life materials, with a permeant dwelling.</i> '	Omission
Local Plan	19	DC2	No ref to date building constructed. Add text to specify buildings constructed prior to 2018		Omission
Local Plan	19	DC3		Rewrite final para to include ref to historic environment " <i>Where agricultural, forestry and other full-time worker dwellings are proposed in the Green Belt, Chilterns AONB, or affect the historic environment; Green Belt, and AONB and historic environment policies will be applied in addition to the above</i> ".	Clarity - representation from Historic England
Local Plan	0	All	Remove references to Plan as 'draft'	Remove references to Plan as 'draft'	Error
Local Plan	Appendix 1	Appendix 1	Add 'Pitch' and 'plot' to glossary		Error
Local Plan	Appendix 1	Appendix 1		Typo in listed building definition ' <i>cartilage</i> '. To be corrected.	Error

**Appendix A – Schedule of Minor Modifications to the Central Bedfordshire Local Plan (April 2018)**

Document	Chapter	Policy/Para	Change required	Proposed change	Reason for change
Local Plan	Appendix 1	Appendix 1	Add 'OAN' to glossary		Clarity
Local Plan	Appendix 1	Glossary of Terms	Add definition of "Heritage Asset", "Non-Designated Heritage Asset", "Registered Park and Garden", and "Setting of a Heritage Asset Scheduled Monument"		Clarity - representation from Historic England
Local Plan	Appendix 1		Add definition of 'spoke' in terms of health hub		
Local Plan	Appendix 2	H1 (28)		This site is not completed so should not be listed as such	Error
Local Plan	Appendix 2	H1 (30)		This site is not completed so should not be listed as such - retain as white land	Error
Local Plan	Appendix 2	H1 (5)		This site is not completed so should not be listed as such	Error
Local Plan	Appendix 2	Site Allocations (North) Development Plan Document		Add HA14 ' <i>Land at Roecroft School Site</i> ' to the list of superseded policies. State ' <i>Superseded by events. Now in education use</i> '	Omission
Local Plan	Appendix 2	Site Allocations (North) Development Plan Document		Add EA8 ' <i>Land at Quest Pit, Amphill Road, Houghton Conquest</i> ' to the list of superseded policies. State ' <i>permission expired</i> '.	Omission
Local Plan	Appendix 2	Site Allocations (North) Development Plan Document		Add MA7 to the list of superseded policies. State ' <i>Superseded by planning application</i> '	Omission
Local Plan	Appendix 3			Second sentence in the text at the beginning - add words ' <i>and the delivery of targets</i> ' after 'policy implementation'. Against SP1 add the following monitoring indicators ' <i>Number of annual dwelling completions against annualised requirements</i> ' ' <i>Quantum of land developed for employment uses annually</i> ' H4 - add into the monitoring indicator column after the word 'dwellings'... ' <i>against targets for affordable rent and intermediate tenure</i> ' H6 - in monitoring indicator column change 'approved' to ' <i>delivered</i> ' and then add ' <i>against targets</i> ' EMP1- after ' <i>uses</i> ' add ' <i>and net gain/loss in B1-B8 employment land</i> ' HQ10 - in monitoring indicator column change replace word 'show' with ' <i>demonstrate</i> ' T5 - add ' <i>number of charging points provided on new developments</i> ' DC5 – delete ' <i>number of applications listing</i> '	Clarity
Local Plan	Appendix 4	CG20	Caption not readable - potential formatting error	Correct caption error	Error
Local Plan	Appendix 4		Revisions to Gap boundaries - Cranfield only	update to map required	Error
Local Plan	Appendix 5	N/A		Revise boundary for Cranfield site to take account of airpark masterplan	Error
Local Plan	Appendix 6	Site allocations		update site boundaries for Cranfield, Clifton and Campton	Error
Proposals Map	N/A			Add route of the Waterway	Omission

## Central Bedfordshire Council

COUNCIL

26 April 2018

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Report of: Cllr Nigel Young, Executive Member for Regeneration [nigel.young@centralbedfordshire.gov.uk](mailto:nigel.young@centralbedfordshire.gov.uk) and Cllr Eugene Ghent, Executive Member for Assets and Housing Delivery [eugene.ghent@centralbedfordshire.gov.uk](mailto:eugene.ghent@centralbedfordshire.gov.uk)

Responsible Directors: Jason Longhurst, Director of Regeneration and Business, [Jason.Longhurst@centralbedfordshire.gov.uk](mailto:Jason.Longhurst@centralbedfordshire.gov.uk) and Marcel Coffait, Director of Community Services, [marcel.coffait@centralbedfordshire.gov.uk](mailto:marcel.coffait@centralbedfordshire.gov.uk)

**This report relates to a decision that is Key.**

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### Purpose of this report

1. Outline the significant opportunity to regenerate the strategically important site at RAF Henlow.
2. Seek endorsement for Central Bedfordshire Council to explore options to transfer or purchase ownership of the RAF Henlow site from the Ministry of Defence (MOD).

### RECOMMENDATIONS

The Council is asked to:

1. **support the exploration of options to transfer or purchase the RAF Henlow site.**

### Overview and Scrutiny Comments/Recommendations

3. This report has not been considered by Overview and Scrutiny Committee or Executive due to the urgent nature and need for Council to provide a strategic steer. Should the decision be made to proceed with transfer or purchase of the site then future reports will be taken to the relevant Overview & Scrutiny Committee and Executive. As there is currently no provision for this expenditure within the Capital Programme, a report will also be made to Council requesting the necessary inclusion.

## **Background**

### **RAF Henlow Site**

4. In September 2016, the MOD announced that RAF Henlow would close by 2020. It is currently home to a number of military lodger units, all providing support direct to operations at home and overseas.
5. The RAF Henlow site is strategically significant, located in the heart of the Cambridge – Oxford Growth Corridor, with the potential to create a world-class aerospace/technology cluster attracting £100Ms of investment in business and job creation.
6. RAF Henlow is a freehold approximately 220 hectare (ha) site located within the Parish of Henlow and close to the village of Stondon. It includes an extensive air field and Henlow Camp to the South East which is a small settlement that has a number of local amenities including Derwent Lower School, shops, golf course and dog racing track. MBDA an established, world renowned business supplying complex weapons, to the Royal Navy, Royal Air Force, British Army and overseas nations is also located here.
7. The site comprises the following main areas:
  - a. North Site – 178ha grass airfield and technical areas. There is no military flying, except for a Volunteer Glider Squadron (VGS) and a commercial flying club. The technical site consists of a number of hangars and other military facilities. The hangars, which are Grade II listed were constructed at the end of the First World War.
  - b. South Site – 21ha technical location consisting of typical Single Living Accommodation, Service Family Accommodation, Officers Mess and office accommodation of varying types and ages. The Officers Mess dates from 1933 and is Grade II listed.
  - c. Sewage works – 2.1ha site isolated from main Station areas.
8. The Defence Infrastructure Organisation (DIO) is responsible for all MOD estates and infrastructure, and is accountable for the disposal of RAF Henlow, with the objective of maximising receipts and meeting housing delivery targets.
9. In Spring 2016, the DIO submitted the RAF Henlow site late into the Council's call for sites exercise to inform the Strategic Housing Land Availability Assessment process for the Local Plan. DIO's subsequent formal representations to the regulation 18 and 19 consultations on the Local Plan also reaffirmed their aspirations for residential development.

The site is now a draft strategic allocation for 130ha of specialist high technology, science, research and visitor economy uses in the submission version of the Plan which will be submitted to the Secretary of State for Examination on 30 April.

10. Central Bedfordshire Council has been working with the DIO to develop regeneration plans for the site that prevent it from becoming “mothballed” resulting in significant delays to its regeneration and the subsequent decline in the local area that would result. There is an opportunity for valuable joint place shaping to deliver regeneration at pace. The current preference from DIO is for the majority of the site to be released for housing.

### **Strategic Fit**

11. Central Bedfordshire Council has been developing a strategy to create a sustainable, mixed use redevelopment including a world class science and technology park to utilise its strategic location and create a thriving, sustainable community that builds on industry related manufacturing base already located on the site.
12. The site, its location and industrial heritage is too important from an economic perspective to be almost wholly used for delivering housing. Moreover, the constraints outlined in more detail in paragraphs 17-19 below render a commercial led redevelopment more feasible than a residential led approach. The safe guarding area required by a site based commercial activity (which is of national importance) effectively sterilises a proportion of the site and a significant housing development on this site is, without significant mitigation, going to have a detrimental impact on the local traffic pressures in this area, principally on the A507. Whilst an element of housing may be appropriate as part of a mixed use sustainable approach, the site offers a tremendous opportunity to develop and showcase some exceptional and ground-breaking technologies which also offer Central Bedfordshire and UK Plc wide benefits.
13. The mixed use regeneration of RAF Henlow fits with the national *Industrial Strategy: building a Britain* for the future, this recognizes the importance of investing in science, research and innovation and states that as the UK prepares to leave the EU the government remains committed to maintaining and building on our strengths in Research & Development (R&D) to continue attracting world class people, skills and foreign investment.

### **Opportunities**

14. Central Bedfordshire Council has been approached by several companies interested in locating at RAF Henlow, giving a strong indication of commercial interest for the site.

Significant discussions have been had with four international businesses who all possess massive growth potential in the global high-performance technologies and R&D sectors. We are also seeking to secure the future of existing businesses on the site. There is a real risk that as all have global connections they could easily switch operations to anywhere in Europe.

15. There is also a dis-used centrifuge foundation within the site which has attracted interest from a key growth sector company. This opportunity has the potential to gain a return for the original MOD investment in the asset.
16. Central Bedfordshire Council has developed an indicative phasing plan for a mixed-use redevelopment that would work in synergy with the MOD plans for decanting the site. Enabling development to move at pace will reduce the possibility of the site becoming stagnant and unused.

### **Constraints**

17. Technical assessment to date has however demonstrated that there are some key constraints in term of housing led development. MBDA has a safeguarded area around it where the land should remain undeveloped. It is likely that this use will remain on site so the safeguarded zone will therefore need to be excluded from any housing development potential.
18. There are four large hangars to the south of the air field that are listed buildings so these would have to be retained as the buildings and their settings are protected. These would be suitable for potential conversion into commercial uses.
19. Substantial residential development would mount further strain on Highway capacity around the site on the A507 and local roads. Additional residential trips would exacerbate peak hour flow movements which cannot be controlled by planning conditions. A commercial use will have more irregular traffic movements which would assist in spreading any increase of traffic flows throughout the day.

### **One Public Estate**

20. One Public Estate (OPE) is an established national programme delivered in partnership by the Cabinet Office Government Property Unit (GPU) and the Local Government Association (LGA). It provides practical and technical support and funding to councils to deliver ambitious property-focused programmes in collaboration with central government and other public sector partners.
21. In November 2017, Central Bedfordshire Council submitted a bid to secure OPE funding to support early stage work. The bid was successful in securing £170K, the highest single amount from the programme round.

22. The funding can be used to enable Central Bedfordshire Council and the DIO to jointly develop regeneration plans for the site at pace. The objectives are to:
- a. Explore options to create a new sustainable, resilient and thriving mixed –use redevelopment of the site;
  - b. Secure and Integrate substantial residential provision on the greater site to help meet DIO and Government targets
  - c. Generate significant capital receipt for redundant MOD land
  - d. Create a significant place and development which is central to the Oxford -Cambridge Growth Corridor and presents a “UK Plc” offer;
  - e. Testing viability of different options for the site including interested companies.
  - f. Meet the needs of the local community, providing jobs, homes and a sense of place in a timely manner (building up the site at the same time as RAF winds down operations).
23. Progress of the OPE programme has been slower than anticipated, due to the differences of each organisation’s remit, priorities and focus.

### **Why Full Council support is needed**

24. Full Council support to explore options to transfer or purchase the site is required given its strategically significant location within the heart of the Cambridge – Oxford corridor, its status as a key employment site within the Local Plan to support developments along the A1 corridor and the impetus to move at pace to keep the site active throughout the decanting process.

### **Council Priorities**

25. The future regeneration of the RAF Henlow site will support the objective of enhancing Central Bedfordshire. Ensuring the mixed use regeneration of the site supports the delivery of planned new homes for residents, new commercial opportunities and the creation of strong, sustainable communities.

### **Corporate Implications**

### **Legal Implications**

26. This report is seeking a mandate from Council to proceed with the exploration of options for the RAF Henlow site and Central Bedfordshire Council leading its future redevelopment. As options are developed and subsequent recommendations made legal advice and consideration will need to be provided to inform final decision making.

### **Financial and Risk Implications**

27. There will be significant financial implications concerning all of the options available to the Council. The extent and nature of these implications will become clearer as the options are developed and subsequent recommendations made.

### **Equalities Implications**

28. Central Bedfordshire Council has a statutory duty to promote equality of opportunity, eliminate unlawful discrimination, harassment and victimisation and foster good relations in respect of nine protected characteristics; age disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
29. Good planning and effective regeneration can improve environments and opportunities for communities experiencing disadvantage. Planning which does not adequately engage with, or consider the needs of, local communities is unlikely to improve their life chances and may further entrench area-based disadvantage.

### **Conclusion and next Steps**

30. Following advice from central government, Central Bedfordshire Council is in the process of commissioning research that examines the economic value of a hi-tech cluster within the context of Cambridge - Oxford Growth Corridor and to support the proposed policy in the Local Plan.
31. We seek to continue engagement with the OPE and directly with DIO to assesses options that enables regeneration of the site through a development partnership, land transfer or acquisition by Central Bedfordshire Council.