Introduction

1.1 Bedford Borough Council is producing a new local plan which sets out the Council’s planning policies for the area. The Bedford Local Plan 2030, once adopted, will be the principal document of the statutory development plan for Bedford borough. (Other documents include the Minerals and Waste Local Plan Strategic Sites and Policies, 2014 together with those parts of the Allocations and Designations Local Plan, 2013 and Bedford Local Plan, 2002 that have not been withdrawn.)

1.2 One of the aims of the Council’s planning policies is to ensure that they contribute to sustainable development. This means balancing social, environmental and economic needs both now and in the future. To help ensure that the Bedford Local Plan 2030 is sustainable, a process called sustainability appraisal has been followed. The Sustainability Appraisal Report incorporates European Union requirements for the assessment of the environmental effects of certain plans and policies. This non-technical summary sets out a summary of the findings.

Baseline information and issues

1.3 ‘Baseline’ data was collected about the area for a range of economic, social and environmental matters. The data looked at the area as it is today. The following key issues were identified.

<table>
<thead>
<tr>
<th>Sustainability issue</th>
<th>Evidence</th>
<th>Mitigation opportunities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Agricultural land    | • Increased demand for development.
                      | • Limited brownfield land available.
|                      |          | • Avoid development of best and most versatile agricultural land.
<pre><code>                  |          | • Prioritise use of suitably located previously developed land. |
</code></pre>
<p>| Climate change       | • Hotter, dryer weather will affect buildings and their occupiers. |
|          | • Influence building design to enable natural cooling. |</p>
<table>
<thead>
<tr>
<th>Topic</th>
<th>Possible Impacts</th>
<th>Proposed Measures</th>
</tr>
</thead>
</table>
| Flood risk                    | • Buildings affected by increased risk of flooding.                              | • Avoid inappropriate development in land liable to flood, taking account of climate change.  
                               |                                                                                 | • Adequate mitigation and resilience measures must be provided to ensure flooding does not occur on site or increase flooding elsewhere.  
                               |                                                                                 | • Mitigation measures and drainage schemes should be designed with due regard to climate change; amenity, biodiversity.  |
| Water resources               | • Limited water resource affected by climate change.                              | • Influence building design to reduce water consumption of occupants.  
                               | • Increasing demand for water.                                                  | • Infrastructure improvements to increase supply.  
                               |                                                                                 | • Ensure that the Water Framework Directive status of waterbodies does not deteriorate and is improved where possible.  |
| Air quality                   | • High levels of nitrogen dioxide in town centre.                                | • Reduce traffic in town centre.  
                               |                                                                                 | • Influence building design to reduce exposure to poor air quality.  |
| Traffic congestion            | • Increased car use.                                                             | • Increase opportunities for public transport, cycling and walking.  
                               |                                                                                 | • Enable non-essential traffic to avoid town centre.  |
| River water quality           | • Variable ecological status.                                                    | • Ensure effects of development proposals fully considered.  |
| Habitat loss and fragmentation| • Increased demand for development.                                              | • Ensure effects of development proposals fully considered.  
<pre><code>                           | • Condition of designated sites declining.                                       | • Consider opportunities to increase and improve habitat provision.  |
</code></pre>
<p>| Threats to heritage assets    | • Increased demand for development.                                              | • Ensure effects of development proposals fully considered.  |</p>
<table>
<thead>
<tr>
<th>Economic</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Unemployment</strong></td>
<td>• Pockets of higher levels of unemployment.</td>
<td>• Ensure sufficient opportunities for employment in accessible locations.</td>
</tr>
<tr>
<td><strong>Town centre</strong></td>
<td>• Competition from neighbouring centres.</td>
<td>• Reduce number of vacant units in town centre.</td>
</tr>
<tr>
<td></td>
<td>• Some areas in need of regeneration.</td>
<td>• Consider opportunities to regenerate sites.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Consider opportunities for environmental improvements.</td>
</tr>
<tr>
<td>Social</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Housing</strong></td>
<td>• Increasing population.</td>
<td>• Ensure that more housing is available to meet needs.</td>
</tr>
<tr>
<td></td>
<td>• Housing affordability.</td>
<td>• Ensure provision of affordable housing.</td>
</tr>
<tr>
<td></td>
<td>• Ageing population.</td>
<td>• Ensure provision of housing to meet specific needs.</td>
</tr>
<tr>
<td><strong>Deprivation</strong></td>
<td>• Pockets of higher levels of deprivation.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Ensure sufficient opportunities for employment in accessible locations.</td>
</tr>
<tr>
<td><strong>Health</strong></td>
<td>• Pockets of lower life expectancy and unhealthy lifestyles.</td>
<td>• Consider opportunities to encourage cycling and walking.</td>
</tr>
<tr>
<td><strong>Social infrastructure</strong></td>
<td>• Increasing population</td>
<td>• Consider opportunities to increase provision of open space and other green infrastructure.</td>
</tr>
</tbody>
</table>

**The sustainability appraisal framework**

1.4 In order to assess how the local plan contributes to sustainability, a set of sustainability objectives was developed. The objectives are as follows:

1. Ensure resilience to and reduce the effects of climate change through effective adaptation and mitigation.
2. Promote sustainable lifestyles, use resources efficiently, maximise recycling and re-use.
3. Conserve and enhance the built and historic environment, heritage assets and their settings.
4. Create, conserve, protect and enhance the borough’s natural features, distinctive local environments, habitats and species.
5. Promote strong, sustained and balanced economic growth, stimulating job creation across a range of sectors.
6. Improve the skills of the labour force, matching skill outcome with market needs.
7. Create a distinctive, attractive and multi-functional town centre.
8. Meet the needs of a changing population.
9. Reduce levels of deprivation, inequalities and exclusion.
11. Promote a strong local identity and sense of place.
12. Minimise growth in car usage, reduce the need to travel and promote the shift to more sustainable modes of transport.

1.5 The sustainability appraisal framework also comprises a series of indicators which are designed to enable an indication of the effect of a policy or proposal on sustainability to be identified.

**Options for the amount of growth**

1.6 The starting point for considering the amount of growth is the National Planning Policy Framework requirement for local planning authorities to provide for objectively assessed needs for housing. Issues and options papers produced by the Council from 2014 considered the level of this need, which increased as new information became available and the period to be covered by the local plan changed from 2012-2032 to 2015-2035.

1.7 Following the January 2018 consultation it became apparent that it would not be possible to deliver a key proposal of the draft plan: the new garden village at Colworth Park. It was decided that submission of the local plan for formal examination would be deferred until alternative options had been considered and the plan amended as appropriate. The Council decided that the most appropriate course of action having regard to all of the circumstances was to reduce the plan-period to 2030. This resulted in a revised assessment of objectively assessed needs and reduced the number of dwellings that needed to be provided.
1.8 A number of options for the amount of growth to be provided in the local plan, including a ‘do nothing’ option, were tested against the sustainability appraisal framework to identify the effects of each option. Testing showed that there were likely to be negative effects on climate change, the use of resources, natural features and car use. However, there were also likely to be positive effects on the delivery of new homes, infrastructure, services and facilities, and supporting strong local economic growth, helping to reduce deprivation. A ‘do nothing’ option was shown not to perform well. No positive effects were identified and there were several negative effects, particularly as a result of the lack of economic growth, the lack of additional housing to meet the needs of the population and the likelihood of an increase in commuting to neighbouring areas for work, shopping and services.

**Options for the distribution of growth**

1.9 Initial options for the distribution of growth to meet the borough’s needs were considered in a series of issues and options papers. Taking account of the results of public consultation, a series of more detailed broad option scenarios were produced. Twenty such scenarios were identified which were broadly able to meet the range of growth required.

1.10 In summary the sustainability appraisal showed that some distinct differences between broad option scenarios could be identified. Those that performed least well were those scenarios that did not include growth in and around the urban area, in the larger villages or at the Stewartby brickworks site. The best performing scenarios included new settlements, development at the Stewartby brickworks site, in the urban area (together with small extensions) and some growth in the rural villages.

1.11 However more detailed analysis of the sites that had been put forward for consideration showed that at this moment none of the new settlement proposals was deliverable within the plan period. Because of this, the local plan allocates more growth to the larger rural villages, with four villages receiving growth allocations. Larger villages where there has been recent large-scale growth or which are close to ongoing or planned large-scale development, are not allocated growth.

1.12 A “do nothing” option was also tested which assumed that the Council does not plan for the distribution of growth. Instead growth to meet identified needs was assumed to occur in accordance with the National Planning Policy Framework’s presumption in favour of development. Development would therefore be likely to occur in locations that are most attractive to
developers. Testing against the sustainability appraisal framework showed that the ‘do nothing’ option would have mainly negative effects and performed less well than any of the other options tested.

**The Council’s preferred strategy**

1.13 The Council’s preferred strategy (the draft local plan for submission to the Planning Inspectorate for examination) is as follows.

- Regeneration in the urban area of Bedford and Kempston, together with limited urban extensions, with growth in housing, employment, retail and other facilities. This will include regeneration projects to create a vibrant and modern town centre while preserving the established character. This will provide 1,996 dwellings within the plan-period.
- Regeneration of the large brownfield site opportunity at the former Stewartby brickworks site. This will provide 100 dwellings in the plan-period and eventually 1,000 dwellings when completed.
- Development in villages at a scale that takes account of existing commitments and infrastructure capacity / potential infrastructure capacity. Growth in the key service centres of Bromham, Clapham, Great Barford and Sharnbrook will provide primarily new homes (500 in each village) but also services for the local community. Growth in the rural key service centre villages will be more limited to help support local services and will provide about 260 dwellings in total. Some development may also be appropriate in smaller settlements if needed and supported by the community but this is not allocated in the local plan.
- Maintaining a living, working countryside and improving the rural area’s self-reliance by supporting opportunities to diversify the rural economy while conserving and enhancing the natural environment.

1.14 Except in the rural service centre village of Roxton, the selection of sites to meet the strategic allocation within villages is being made by the respective Parish Councils through their neighbourhood plans.

1.15 No specific sites are allocated to provide additional land for employment but the local plan includes a general policy to explain how the Council will deal with any proposals to develop new free-standing employment sites. New employment development should be located near to main roads, preferably re-using existing employment sites, and be in locations with
good access by public transport, bicycle and on foot. In accordance with national government guidance, the preferred location for retail and office development is the town centre.

1.16 The result of testing the preferred strategy against sustainability objectives found that it was likely to have both positive and negative effects on sustainability indicators. Positive effects include:

- Maximising the use of previously developed land.
- Improved infrastructure.
- Economic growth, job creation and improved skills.
- Bedford town centre becoming more attractive and successful.
- Providing a range of housing (including affordable and older persons) and helping reduce deprivation.
- Promoting healthy communities by providing walking and cycling facilities, open space and leisure facilities.
- Reducing the need to travel by increasing the overall provision of services, facilities and employment across the borough.
- Making rural public transport and other sustainable modes of travel increasingly viable.

1.17 The likely negative effects include:

- Much new development will be on greenfield land which could potentially affect habitats, species and natural features.
- Increased resource consumption (energy, water, land) and waste production.
- Employment growth could lead to greater traffic congestion and poorer air quality unless public transport is improved.

1.18 To minimise the negative effects and increase sustainability benefits, the sustainability appraisal recommended that mitigation measures be included in the local plan.

**Testing local plan policies**

1.19 The detailed policies of the local plan were also evaluated against the sustainability appraisal framework. In summary the assessment of the policies showed that most policies had primarily positive effects on sustainability objectives, with many having no negative effects at all. However several policies were assessed as having some negative effects or uncertain
effects. In relation to policies that allocated specific development sites, the appraisal showed that previously developed sites located within the urban area had strongly positive effects on sustainability objectives while sites which had not been previously developed, tended to have some negative effects as well as positive effects. The positive effects for sites that were not located within or adjoining the urban area were less strong.

1.20 Conflicts between policies facilitating development and environmental objectives are to be expected and do not invalidate local plan policies. Instead they help identify the need for mitigation that can be incorporated into the local plan. Not all negative effects can be fully mitigated however, for example where these are implicit in the location of a site. The sustainability appraisal made recommendations for the mitigation of negative and uncertain effects.

1.21 The assessment of the cumulative effects of the policies is important because sustainability problems may result from the accumulation of many small impacts, rather than just a few large ones. The assessment identified mainly positive cumulative impacts. Several potential negative effects were identified, however these could be addressed by policies in the local plan.

**Monitoring**

1.22 It is important to monitor the local plan in order to identify any unforeseen effects on sustainability and to enable appropriate remedial action to be taken. Monitoring allows the actual effects of the local plan to be tested against those predicted in the sustainability appraisal. It is intended that sustainability monitoring will be incorporated into existing monitoring arrangements and be included in the Council’s Monitoring Report.