



20 August 2021

Bedford Borough Council
Local Plans Team

Contact Officer: Nigel Smith
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By email only

Dear Sir / Madam,

Bedford Local Plan 2040: Strategy Options and draft policies

Thank-you for the opportunity to comment on the above consultation.

We are currently anticipating that the examination into our own Local Plan for the period 2011-2031 will conclude this Autumn. Once complete (and without prejudice to any Inspector's report or decision on adoption), this would – along with the Plans for neighbouring Luton and Central Bedfordshire – complete the statutory planning framework for addressing the housing needs of Luton over this period.

It is our understanding that Luton intend to commence a review of their own Local Plan once the issue of its housing needs over the period 2011-2031 have been fully resolved. Key decisions around that Plan are yet to be made, in terms of plan period, housing requirements, potential development capacity within Luton etc. Proposed Government reforms to the planning system are also anticipated. These may include successor arrangements to the current statutory Duty to Co-operate. However, I would presently anticipate that unmet development needs from Luton for the period beyond 2031 could well be an issue that requires further consideration in this next round of plans.

Under the agreements reached for the current round of plan-making it was acknowledged that, in the first instance, authorities within the functional Luton Housing Market Area (Luton, Central Bedfordshire, North Hertfordshire and Aylesbury Vale) would work together to meet any unmet needs to the best of their abilities. In the event unmet needs arising from Luton could not be met within the defined Luton Housing Market Area, it would be necessary to initiate a wider search within adjoining housing market areas with good links to the town.

It has been acknowledged by the authorities in the housing market area that North Hertfordshire has made the maximum reasonable contribution to unmet housing needs from Luton in its current Plan. Central Bedfordshire have faced significant challenges in accommodating unmet needs from Luton alongside their own needs that arise within areas of the authority that fall within the Luton Housing Market Area. However, between the two authorities, it is proposed that the identified unmet needs of Luton for the period to 2031 will be met.

As your current consultation identifies (paragraph 6.2):

Bedford benefits from good strategic connections to London and nearby economic centres, such as Milton Keynes and Luton, and planned improvements to connect to Cambridge.

We would therefore request that any detailed policies or draft plan for Bedford acknowledge that it may be necessary to give the issue of Luton's future housing needs further consideration and are framed sufficiently flexibly to accommodate such an outcome (e.g. through a focussed or partial review of relevant policies should this prove necessary).

If you would like to discuss any of the comments raised in this response in more detail, please contact me using the details provided.

Yours sincerely,

A handwritten signature in black ink that reads "N Smith". The signature is written in a cursive, slightly slanted style.

Nigel Smith
Strategic Planning Manager, MRTPI
North Hertfordshire District Council

Cc Luton Borough Council, Central Bedfordshire Council