

**By Email only**

15<sup>th</sup> March 2023

Dear Sir/Madam,

**Bedfordshire LNP response to the CBC consultation on the Central Bedfordshire Design Guide SPD**

The Bedfordshire Local Nature Partnership was formally established in October 2013. Local Nature Partnerships (LNPs) have been established across England. The purpose of the Bedfordshire Local Nature Partnership is to ensure the natural environment is valued and integral to local decision making to deliver benefits for wildlife, people, landscape, heritage, and the local economy. The Bedfordshire LNP covers the geographical area of Bedfordshire, including the Luton, Bedford and Central Bedfordshire unitary councils.

Our vision is to be an independent, challenging, ambitious and outward-reaching partnership, leading the way to the creation of a vibrant, biodiversity-rich and sustainable natural environment valued by all, enhancing health and well-being, culture and the local economy. The aims of the LNP are as follows:

- To champion the importance of the natural environment and the benefits it brings with key decision-makers and influencers locally, resulting in the protection, enhancement and positive use of a diverse, high quality natural environment;
  - To act as a natural environment advocate and critical friend to local and national government, Local Enterprise Partnerships, businesses, developers and infrastructure providers;
  - To encourage opportunities for people across Bedfordshire to engage with the natural environment;
  - To ensure the natural environment is prioritised, planned for and delivered in an inclusive way to benefit existing and new communities;
  - To ensure that the natural environment is valued and central to decision making and local economic plans;
  - To promote the natural environment as a critical factor in underpinning the local economy through a natural capital-led approach;
  - To achieve a net gain in natural capital, with net biodiversity gain at its core, as part of housing, infrastructure and other development including within the Ox Cam Arc;
  - To promote the natural environment as a means of improving health and well-being within local communities;
  - To champion sustainable practices which protect the natural environment and support a water catchment approach to ensure a high quality water environment;
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- To support cross boundary working within SEMLEP and neighbouring LEPS and LNPs;
- To develop knowledge and understanding of adaptation to future climate extremes and the changing needs of the environment, society and the local economy.

Our membership includes a range of organisations with an interest in the natural environment of Bedfordshire, including government agencies, local councils, charitable trusts and other organisations.

We thank you for the opportunity to engage with this consultation, and I have been authorised to make this representation by the Board of the LNP. The views expressed here represent the position of the LNP and are not intended to replace those of our members.

### **The Bedfordshire LNP welcomes this updating of the CBC Design Guide SPD.**

Our comments are as follows:

- The Design Guide covers the appropriate themes, including nature, public spaces and movement alongside the built environment.
  - We welcome reference to key landscape-scale initiatives and designations within the SPD, including the Forest of Marston Vale, Greensand Country/Greensand Ridge NIA and Chilterns AONB, but the distinctiveness of and objectives around each of these areas should be better reflected in the Design Guide.
  - The Bedford-Milton Keynes Waterway Park should also be referenced as a potential 'driver' of local character, influencing development especially with regard to its relationship with the proposed waterway and associated green spaces.
  - The SUDS approach should be fully integrated into the Design Guide, ensuring such schemes are properly considered and developed alongside other requirements around design, distinctiveness and integration into the landscape.
  - The OxCam Environmental Principles have not been referenced or integrated into the Design Principles, despite the fact that CBC has signed up to these – this must be addressed alongside the implications of the Environment Act (2021) and the Environmental Improvement Plan (2023) targets, helping demonstrate how good quality, well-designed development can help deliver these.
  - Significant reference is made to the Central Bedfordshire Green and Blue Infrastructure Strategy, but this document has not yet been published. It is therefore difficult to confirm that it will serve the purpose required alongside the Design Guide. We understand publication is imminent, but this is not compatible with the timeframe for submitting this response.
  - There needs to be reference to the Natural England GI Framework (2023) and the standards contained within it, including the requirement for these to be met as a minimum
  - We welcome the statement in 8.1 that “nature must take a stronghold in the design process from the outset” but this needs clearer explanation of what is
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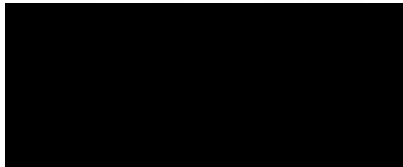


meant/required. Additionally, this sentiment expressed in 8.1 is not followed through in this section. Better reference should be made to:

- Priority habitats within Central Bedfordshire and their distribution
- The importance of integrating natural habitats within development, enhancing them and improving connectivity between the.
- The importance of providing opportunities for people to engage with nature close to where they live, contributing to health and wellbeing.
- The forthcoming Local Nature Recovery Strategies and the principles behind Nature Recovery (e.g. Bigger, Better, More and Joined-Up – Lawton 2010)
- The Design Guide should also reference resources available via the Bedfordshire LNP website (<https://bedfordshirenaturally.com/downloads/>), including reports on Natural Capital Mapping work – identifying these as a source of information that can influence the design of development and the ecosystem service functions provided.
- We welcome reference in the Nature section (8.8.1) to Management and Maintenance – it is essential that the need to establish sustainable natural habitat management is conveyed so that interest and quality are not lost over time.
- We welcome reference to Biodiversity Opportunity Networks (8.11.12). This should include reference to ‘Re-building Bedfordshire’s Biodiversity’ and the forthcoming Local Nature Recovery Strategy.

Please do not hesitate to contact us if you require further assistance in applying these comments to the Design Guide SPD.

Yours sincerely,



Jon Balaam  
**Secretariat to the Bedfordshire Local Nature Partnership**

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