



Local Plan 2040

Have Your Say on the Future of Your Borough

Bedford Borough Council – Local Plan 2040 Draft Plan Consultation Response Form

We would prefer to receive your comments via our online system

www.bedford.gov.uk/localplan2040

In particular, if you are a planning consultant or agent please help us to speed up the production of local plans by using the online system. If you require assistance, please contact us on 01234 718070.

Please only use this form if you cannot respond online and to make your comments on the Local Plan 2040 Draft Plan and its supporting documents. You will need to have the document you want to comment on to hand so that you can enter the appropriate references. Copies of the document are available to view on the Council's website www.bedford.gov.uk/LocalPlan2040 and in paper copy (**by 45 minute appointment**) at Bedford Central Library, Harpur Street, Bedford MK40 1PG (01234 718174). Subject to Covid restrictions being lifted on 19th July, paper copies will also be made available at all libraries in the borough, plus the key documents will be available at Rushden, St Neots, Biggleswade and Flitwick libraries during normal opening hours.

Please email this response form to us: planningforthefuture@bedford.gov.uk

Alternatively, responses can be sent by post. Please attach a stamp and send to:

Planning Policy Team
Bedford Borough Council
Borough Hall, Cauldwell Street
Bedford, MK42 9AP

PLEASE DO NOT SUBMIT COMMENTS IN MORE THAN ONE FORMAT OR SEND TO MORE THAN ONE EMAIL ADDRESS. If you have submitted comments electronically you do not need to print and post them. **All responses (electronic and paper) must be received by 5pm on 3 September 2021.**

Your contact information will be kept on the Planning Policy database so that we can keep you up to date about this and other planning policy documents. Personal data will be collected and processed in accordance with the Data Protection Act and the General Data Protection Regulations. Further information can be found on the council's Data Protection webpage and in the Privacy Notices for planning policy.

All responses will be made public.

CONTACT DETAILS

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AGENT DETAILS (if applicable)

If you are a planning consultant or agent, you can do this on-line. You will be able to save a draft to complete later, save the final version for your records, save paper and speed up plan making. If you require assistance, please call 01234 718070

Title

Name

Job title (if applicable)

Organisation (if applicable)

Address

Postcode

Telephone Number

Email

If you are using an agent, who would you prefer any correspondence to go to?

(Please mark X one box only)

Contact agent

Contact client

Contact both

Your interest (Please mark X one box only)

Land owner

Resident

Consultant

Agent

Other

Please specify 'Other' (please write in)

Please use a separate form (this page) for each consultation document paragraph, policy or evidence base document you are commenting on.

Which paragraph number, policy number or evidence base document are you commenting on?

Whole Document

Please add your comments in the box below, and continue on an additional sheet if necessary.

I am writing to provide a response of behalf of East of England Ambulance Service NHS Trust (EEAST) in relation to the Council's consultation on the Local Plan Strategy Options and to confirm our commitment to working in partnership with the Council and Bedfordshire, Luton and Milton Keynes Clinical Commissioning Group (BLMK CCG) to jointly plan the necessary infrastructure to help local community in Bedford Borough prosper.

As both a health partner and an emergency service would hope to engage with the Council next year as the revised IDP is developed as a supporting document to the 2040 Local Plan.

We welcome further discussions with the Council around how we collectively can mitigate the cumulative impact of housing developments across the health infrastructure serving Bedford Borough, in a way which complies with the statutory tests in CIL regs 122, ie

A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is:

- (a) necessary to make the development acceptable in planning terms;*
- (b) directly related to the development; and*
- (c) fairly and reasonably related in scale and kind to the development.*

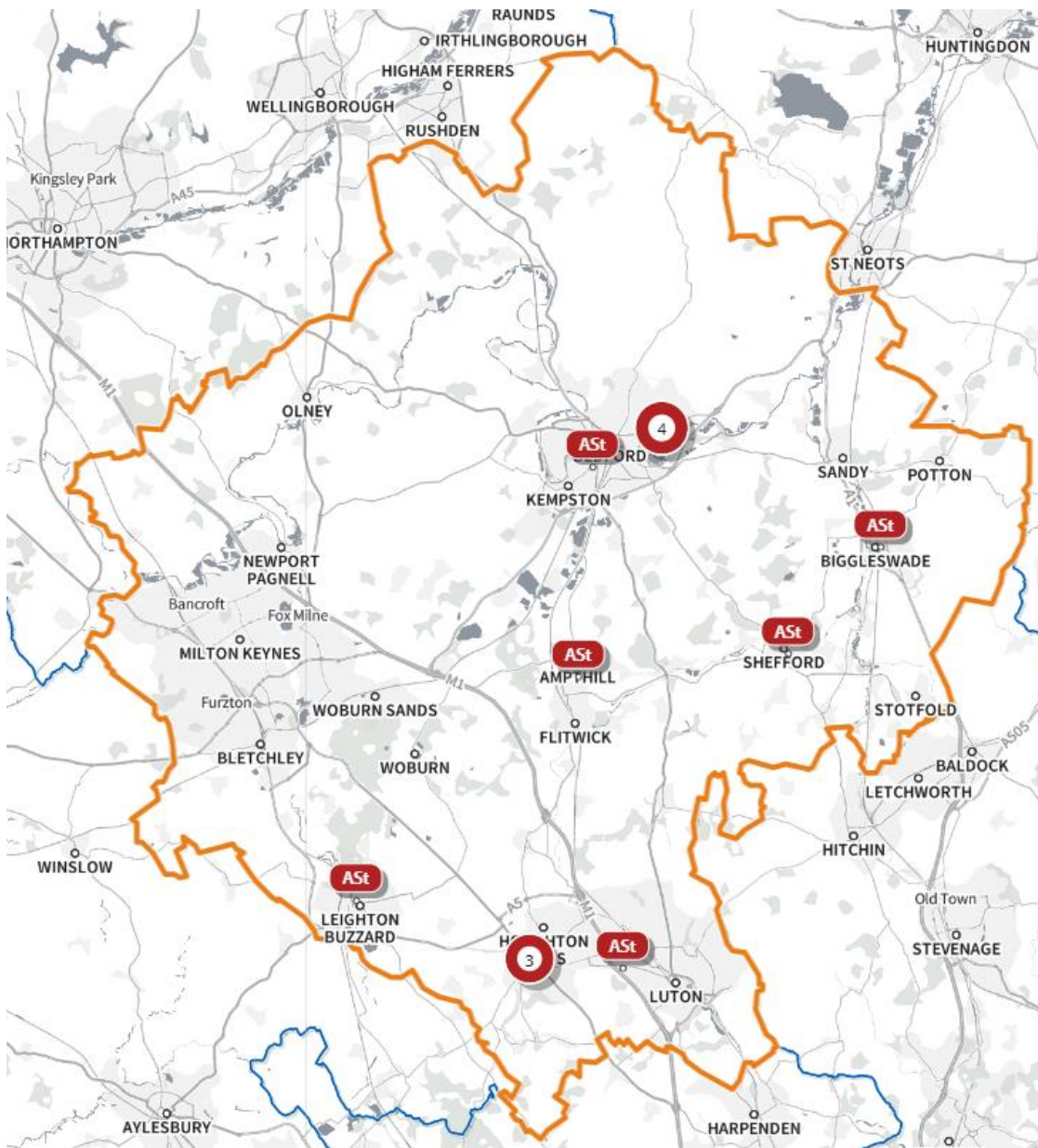
Every effort is made to EEAST's request for a S106 developer contribution is tailored to each individual development.

EEAST are in the process of developing an evidence-based formula to identify the impact of population growth for housing and infrastructure developments on ambulance services (encompassing both emergency and non-emergency patient transport). This will include key projects to enable delivery of their services due to population growth on housing developments, nursing and care homes or over 55 developments. As an emergency service, EEAST is also impacted by changes to road/rail infrastructure. EEAST together with BLMK CCG would welcome further discussions around how the infrastructure impact of the Borough's 2040 Local Plan can be collectively addressed and support net Carbon Zero, deliver BREEAM Outstanding sustainability standards.

EEAST's Estates Strategy (2020-2025) summary position is to provide cost effective and efficient premises of the right size, location, and condition to support the delivery of clinical care to the community served by the Trust. A range of national initiatives are underway aimed at improving performance and sustainability within the NHS across wider urgent and emergency system in all six counties along with Local Authorities and Councils, Universities, military establishments, and private providers of ambulance services. Addressing these changes requires the Trust to develop revised operating models and strategies for all aspects of its services, including operational support services such as the Estates Service. A key component of this process has been to establish the Trust's future Operating Model and to commence planning for the resulting transformation of support services. Expansion to the existing Make Ready Hub and Spoke network will be required to meet the growing demographics.

Each Hub will have a network of Spokes termed Ambulance Station Response Posts (ASRP), tailored to meet service delivery and patient response specific to their local area. Other infrastructure developments such as road and rail also impact on EEAST as an emergency services provider, with requirements to meet nationally set response times.

The spoke network is determined by the changes to infrastructure and changes to local population health care needs through patient flow modelling and subsequently EEAST staffing requirements. The aim is to create demand-centric and agile spokes which are adapted to activity requirements (both permanent and temporary workforce requirements during significant infrastructure development construction periods) as these change over time.



East of England Ambulance Stations in Bedfordshire & Luton

Spokes can be made up of:

- Ambulance Station Reporting Base - 24/7 permanent reporting base for staff and primary response location for one or more vehicles
- Ambulance Station Response Post - primary response location which includes staff welfare facilities
- Standby Location - set in strategic locations where crews are placed to reach patients quickly. Facilities used by staff are provided by external organisations to EEAST.

The resulting estate configuration which consists of a network of up to 18 ambulance Hubs. Each 'hub' will incorporate

- A make ready center from which the Make Ready Service is delivered
- Workshop facilities providing service, maintenance, and repair services for operations vehicles within the local spoke network, including Patient Transport Service (PTS) vehicles
- Consumable product stores, with stock-levels maintained on a just-in-time basis by direct supplier delivery
- Some hubs will operate additionally as the bases for certain corporate, administrative and support services
- PTS facilities incorporated into the operational estate, primarily at the 'hubs'

In addition, across the Trust's region there are:

- Two Hazardous Area Response Team (HART) bases, located to best support the major airports within the Trust's region
- A Trust HQ co-located within operational premises
- A regional training school providing staff professional training, co-located with driver training and supported by up to two satellite professional training locations plus general training facilities at each of the 'hubs'
- A fleet logistics center at one of the hubs', incorporating a 24-hour fleet logistics call-center.

In reference to BLMK CCG catchment, EEAST provides services across Central Bedfordshire, Bedford Borough Council and Luton Borough Council. Luton forms part of the 18 Make Ready Hubs across the region. Within Bedford Borough the Hub is located in Kempston with plans for refurbishment or redevelopment as appropriate to meet the Trust's Integrated Transformation Plan.

EEAST estates and development plans consider growth in demographics of population changes and therefore any increase in requirements to meet these changes will require modelling to account for the required increased workforce, equipment and vehicles. EEAST are currently participating in an independent service review commissioned by healthcare regulators to better understand what resources are needed to meet patient demand.

Acute, Mental Health, Social and Out of Hospital Services

As ICSs deliver hospital services reconfiguration and transformation into new models of care meaning, ambulance services will be impacted by:

- Ageing population and greater number of people living with long term conditions – creates greater demand on both emergency and patient transport services.
- An increased need for emergency ambulance services to deliver more out of hospital care, such as by expanding their “hear and treat” and “see and treat” services.
- Development of centralised care hubs, such as vascular and stroke networks, may lead to increased conveyance times, but with improved outcomes for patients.
- Changes to discharge care models are likely to increase the number of patients discharged with more complex needs and are likely to require increased levels of care during transportation as well as effective and timely handover of care.
- Focusing on improvements to acute and ambulance service diagnostic and digital connectivity.

The provision of health and social care services out of hospital care into community and social care via diagnostic hubs and community locations will require changes to patient transport services.

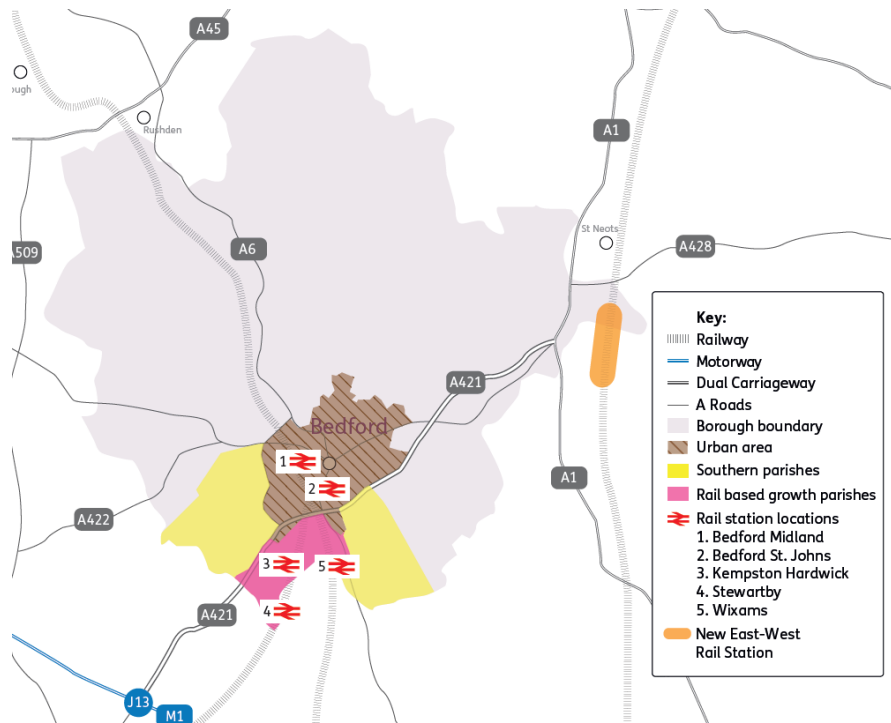
Assessment of Strategy Options

This section provides further assessment of the impact of each of the proposed options on **EEAST Emergency Ambulance Services and non-emergency Ambulance Services** across the Borough, and the likely mitigations to be considered as part of the Infrastructure Delivery Plan next year.

Option 2a: Development in and around the urban area, plus A421 transport corridor with rail-based growth parishes and southern parishes.

<p>Within the urban area (1,500 dwellings).</p>	<p>As far as practically possible ambulance services will be incorporated into existing ambulance hubs or response posts, however this may not be possible and additional response or stand by posts may be required. This may be in larger primary care premises or jointly located with fire and police or other potential solutions.</p> <p>Additional financial contributions from developers may be required to enable expansion or introduction of new response posts to retain the nationally mandated response times</p>
<p>Adjoining the urban area (1,500 dwellings), up to 51 ha employment.</p>	<p>As far as practically possible ambulance services will be incorporated into existing ambulance hubs or response posts, however this may not be possible and additional response or stand by posts may be required.</p>

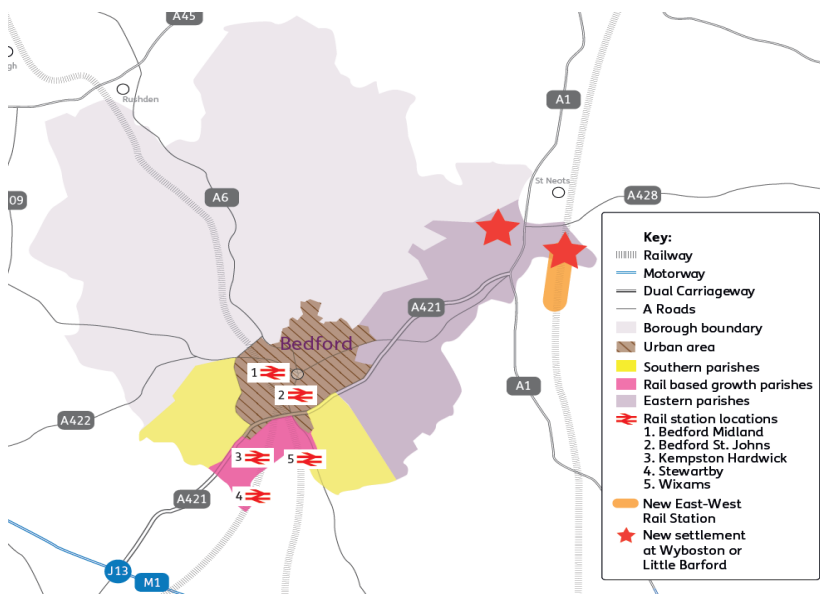
	<p>This may be in larger primary care premises or jointly located with fire and police or other potential solutions.</p> <p>Additional financial contributions from developers may be required to enable expansion or introduction of new response posts to retain the nationally mandated response times</p>
<p>Transport corridor – rail-based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams (high option) (7,500 dwellings), up to 80 ha employment.</p>	<p>As far as practically possible ambulance services will be incorporated into existing ambulance hubs or response posts, however this may not be possible and additional response or stand by posts may be required. This may be in larger primary care premises or jointly located with fire and police or other potential solutions.</p> <p>Additional financial contributions from developers may be required to enable expansion or introduction of new response posts to retain the nationally mandated response times</p>
<p>Transport corridor – south: land within the parishes of Cotton End, Elstow, Kempston Rural, Shortstown, Wilstead and Wootton (2,000 dwellings).</p>	<p>As far as practically possible ambulance services will be incorporated into existing ambulance hubs or response posts, however this may not be possible and additional response or stand by posts may be required. This may be in larger primary care premises or jointly located with fire and police or other potential solutions.</p> <p>Additional financial contributions from developers may be required to enable expansion or introduction of new response posts to retain the nationally mandated response times</p>
<p>Total 12,500 dwellings and up to 131 ha employment</p>	



Option 2b: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes and southern parishes, plus one new settlement.

<p>Within the urban area (1,500 dwellings).</p>	<p>As per Option 2a</p>
<p>Adjoining the urban area (1,500 dwellings), up to 51 ha employment.</p>	<p>As per Option 2a</p>

<p>Transport corridor – rail-based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams (low option) (5,500 dwellings), up to 80 ha employment.</p>	<p>As per Option 2a</p>
<p>Transport corridor – south: land within the parishes of Cotton End, Elstow, Kempston Rural, Shortstown, Wilstead and Wootton (1,500 dwellings).</p>	<p>As per Option 2a</p>
<p>New settlement at Little Barford (3,085 dwellings) or Wyboston (2,500 dwellings), up to 20 ha employment.</p>	<p>As far as practically possible ambulance services will be incorporated into existing ambulance hubs located in Huntingdon or response posts in St Neots as the locations within Bedford Borough are geographically too distant. Methodology to agree to this will need to be established and if not possible alternative measures assessed as part of the IDP.</p> <p>Additional financial contributions from developers may be required to enable expansion or introduction of new response posts to retain the nationally mandated response times</p>
<p>Total between 12,500 and 13,085 dwellings and up to 151 ha employment.</p>	





East of England Ambulance Stations covering Little Barford and Wyboston

Option 2c: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes, plus two new settlements.

Within the urban area (1,500 dwellings).	As per Option 2a
Adjoining the urban area (1,500 dwellings), up to 51 ha employment.	As per Option 2a
Transport corridor – rail-based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams (extra low option, this being the residual required to meet need) (3,915 dwellings), up to 80 ha employment.	As per Option 2a
New settlements at Little Barford (3,085 dwellings) and Wyboston (2,500 dwellings), up to 20 ha employment.	As per Option 2b
Total 12,500 dwellings, up to 151 ha employment.	

Option 2d: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes, southern parishes and east parishes, plus one new settlement.

Within the urban area (1,500 dwellings).	As per Option 2a
Adjoining the urban area (1,500 dwellings), up to 51 ha employment.	As per Option 2a
Transport corridor – rail-based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams (low option) (5,500 dwellings), up to 80 ha employment.	As per Option 2a


Transport corridor – south: land within the parishes of Cotton End, Elstow, Kempston Rural, Shortstown, Wilstead and Wootton (750 dwellings).	As per Option 2a
Transport corridor – east: land within the parishes of Cardington, Cople, Great Barford, Little Barford, Roxton, Willington and Wyboston (750 dwellings), up to 28 ha employment.	As per Option 2b Further analysis required to support IDP development. Infrastructure impact will be dependent on distribution of growth across these communities. Any relocation of Great Barford Surgery premises would provide the opportunity to explore a response post at this location. Potential requirement for financial contributions from developers.
New settlement at Little Barford (3,085 dwellings) or Wyboston (2,500 dwellings), up to 20 ha employment.	As per Option 2b
Total between 12,500 and 13,085 dwellings, up to 179 ha employment.	

We hope that this information provides a useful indication of the expected impact on health services of the proposed Strategy Options set out in the Local Plan 2040 consultation document. We look forward to working with the Council throughout the development of the Local Plan and associated Infrastructure Delivery Plan.

Bedford Brough Design Guide

EEAST would welcome the opportunity to work with the Council and our other emergency partners on the scope of the design guide. The Council may be interested in reviewing the document created jointly across emergency services in Essex: [Engaging with the Emergency Services | Essex Design Guide](#).

Yours sincerely


Head of Business Relationships
East of England Ambulance Service NHS Trust