



Strategic Planning Research Unit  
*A specialist team within DLP Planning Ltd*

For and on behalf of  
**Bedfordia Developments Limited**

**Regulation 19 Bedford Local Plan 2040**

**Site Specific Report**

**Land At Green End, Kempston (Site ID: 1247)**

**Prepared by  
Strategic Planning Research Unit  
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July 2022



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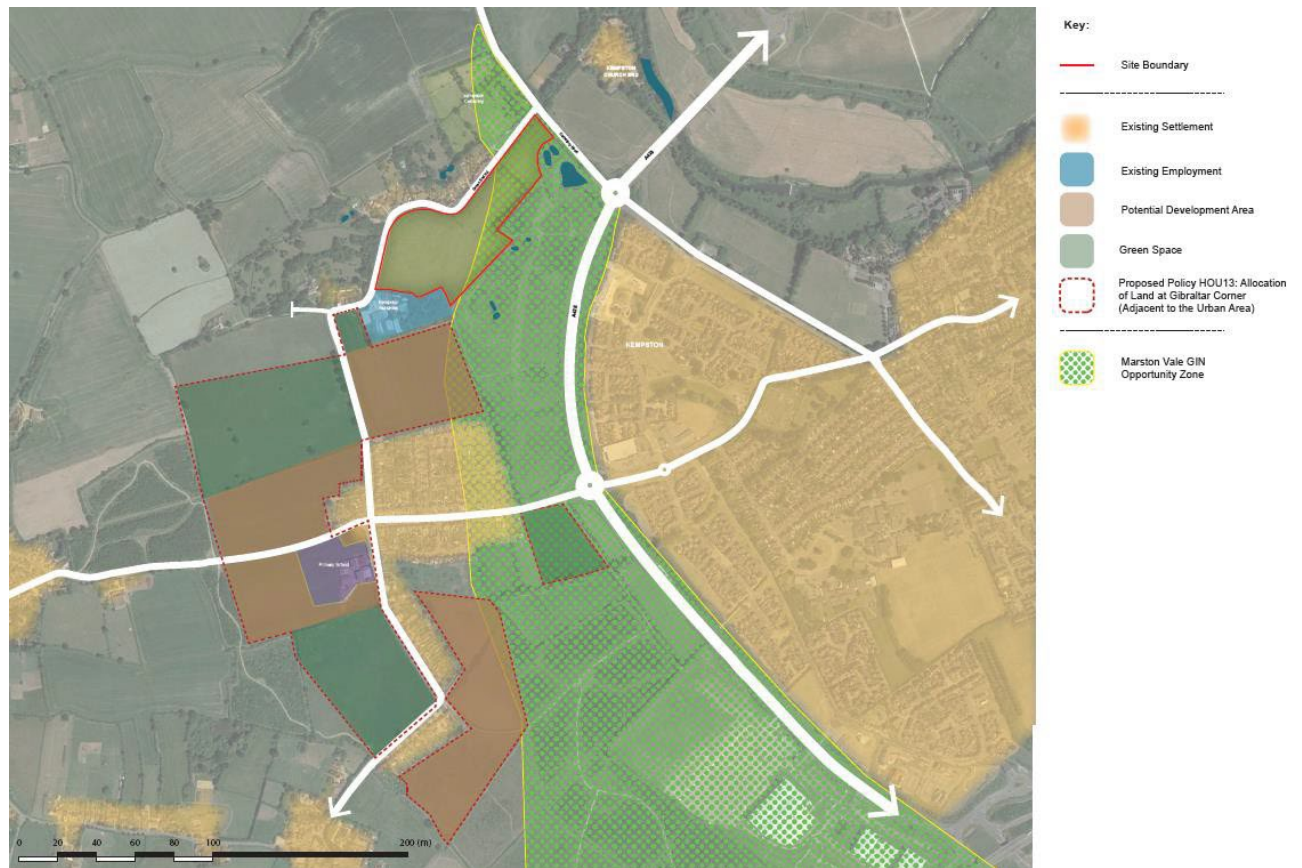
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## 1.0 INTRODUCTION

- 1.1 This Local Plan Representation has been prepared by DLP Planning Ltd on behalf of **Bedfordia Developments Limited** ('the clients') in response to the publication of the Bedford Local Plan 2040 (Regulation 19) for consultation.
- 1.2 This Statement relates to **land at Green End, Kempston**. This should be read alongside previous Regulation 18 consultations (Representation ID: 8572 / Site ID: 1247) ((Appendix 1)) submitted in respect of the above site and an updated Site Analysis Document (Appendix 2). This Statement should also be read alongside the overarching Spatial Strategy and Legal Compliance Representation Report covering our client's wider interests and accompanying representations forms.
- 1.3 Consideration is given to the development potential of our client's land at Kempston, and these representations provide a response in respect of the draft policies relating to the spatial strategy and scale and distribution of housing of housing provision.
- 1.4 Our client's wider concerns with the plan-making process for preparation of the Local Plan 2040 indicate a requirement for Modifications in order to satisfy the requirements for soundness and legal compliance.
- 1.5 This Statement reflects that while cumulatively the requirement for Modifications may result in some change to the Council's selected strategy individually potential solutions exist to address current soundness issues that would not result in a significant change to the Council's approach to managing growth under existing or emerging policy.
- 1.6 Specifically, our client's land at Green End, Kempston would support the prioritisation of development at sustainable locations at the urban edge without undermining the function of any other components of the strategy. Maximising the contribution from urban edge sites could make an important contribution when it comes to delivering housing, offsetting a reliance on strategic scale growth elsewhere within the Plan. The site shares numerous characteristics assessed favourably in the Council's assessment of the selected strategy, reflecting its location adjacent to draft allocation HOU13 (Gibraltar Corner) and with scope to provide comparable benefits in terms of the contribution to Green Infrastructure networks in this location.

**Figure 1. Site Context Plan**



1.7 This Statement explains why the site should be assessed in this context when addressing the overall requirement for Modifications and provide support for its allocation through changes to Policies DS2(S) and DS5(S), without materially affecting the submission version Plan.

## 2.0 PLAN FOR SUBMISSION (REGULATION 19) CONSULTATION RESPONSE

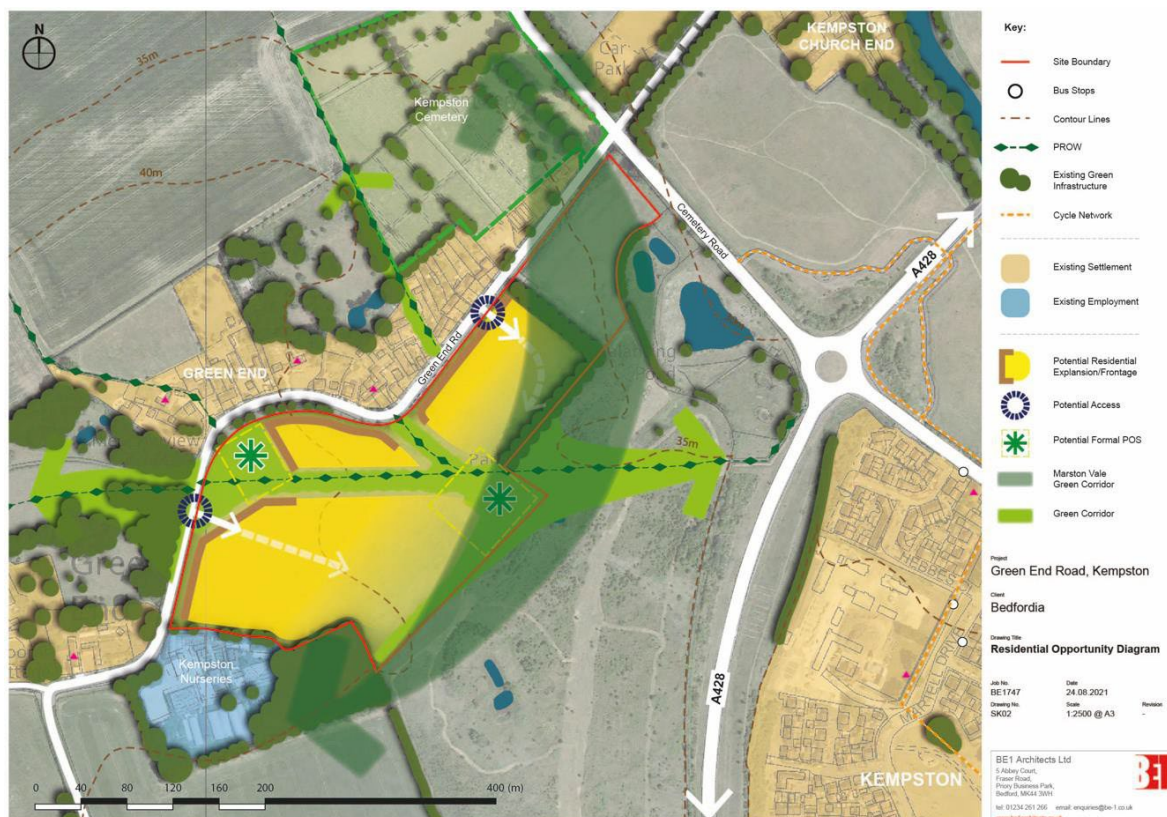
### a) Site Identification and Development Potential

2.1 The site in question is on land at Green End, Kempston and was previously submitted for consideration as part of the 2020 Call for Sites, with submissions in respect of the site having been made throughout the Plan process to date.

2.2 A Site Analysis Document (Appendix 2), which was appended to the Regulation 18 representations, has been updated to illustrate the relationship with the Council’s proposed allocation of land at Gibraltar Corner (HOU13) within its Plan for Submission Local Plan 2040. BE1 Architects, with input from Transport Consultants SDD, have assessed the development potential of the site, which is considered suitable to accommodate a variety of scales and types of development subject to design.

2.3 An illustrative land use plan shows one way in which the site could accommodate up to 120 dwellings;

**Figure 2. Illustrative Land Use Plan**



2.4 The site, extending to circa 7 ha, comprises an area of grassland and lies on the western side of Kempston. The land is sustainably-related to but maintains separation from the urban edge of the town. Access can be achieved via Cemetery Road or Green End Road.

## **b) Sustainability Appraisal and Spatial Strategy**

- 2.5 The SA considers the site (Ref. 1247) as being adjacent to the urban area. The SA at paragraph 9.9 states in respect of sites adjacent to the urban area;
- “The Council has decided that sites adjoining the edge of the urban area in most instances should not be part of the local plan strategy because, in many locations, the gap between the edge of the town and villages surrounding it is very narrow and the strategic expansion of the urban area in recent years has already reduced that separation. The Council’s strategy is not to infill those gaps but to support only two sites adjacent to the urban area, where there are clear benefits associated with delivering the Council’s strategic green infrastructure priorities (Bedford and Milton Keynes Waterway Park and Bedford River Valley Park, including the watersports lake)”.*
- 2.6 The Council’s own evidence base does not justify this conclusion following an objective assessment of site options to the same degree of detail. Appendix 4 of the SHELAA shows that at Stage 2 almost no sites have been rejected based on the Council’s definition as “suitability” (e.g., inability to secure suitable mitigation for matters such as coalescence).
- 2.7 Appropriate sites at the urban edge, and specifically our client’s land Green End (ID: 1247), have been arbitrarily rejected at Stage 1 without any assessment of their relationship with the urban edge or impact on separation and irrespective of the conclusions against the Stage 3 Sustainability Appraisal Indicators (which were in fact established prior to the Council ruling out sites using its Stage 1 criteria).
- 2.8 It should be noted that this site would continue development in Kempston in a sustainable manner in this regard. The Council has already acknowledged on several occasions that the A428 bypass does not provide a significant obstacle to the expansion of development west of Bedford. Numerous construction projects have penetrated the bypass, including new employment west of the A428 that has encroached into the Green Infrastructure corridor. Our client’s land would continue to be a viable place for expansion that is reachable from the major urban area while avoiding any further detrimental effects in this respect.
- 2.9 It is in the context of an objection to the way in which development adjacent to the urban area, as set out in the draft policies, has been assessed through the preparation of the Plan that we promote this site for further consideration as part of an appropriate and justified spatial strategy. The site is capable of delivering meaningful growth of around 120 dwellings, that can contribute to the overall supply of housing, particularly in the early years of the Plan and would deliver a range of social and economic benefits, including the provision of green infrastructure, recreation space and an additional population that could support the services

and facilities in Kempston

- 2.10 The suggested Plan strategy and distribution of growth, the approach to Sustainability Appraisal and the applications of its findings (alongside the HELAA) in terms of site selection are our key concerns in respect of the Plan as drafted. We have identified several inconsistencies with the Environmental Assessment of Plans and Programmes Regulations of 2004 (SEA Regulations). The Council has not adequately addressed the needs imposed by Policy 1 of the adopted Local Plan 2030 and the requirement for an immediate review in terms of assessing a full range of reasonable alternatives to the same level of detail as the chosen option, namely fully assessing the potential effects of detailed site options for allocations across the settlement hierarchy.
- 2.11 The fundamental flaws in the Council's approach are highlighted by the circularity in the processes for site evaluation and sustainability appraisal. According to paragraph 9.13 of the 2022 Sustainability Appraisal, the Strategic Housing Land Availability Assessment process was used to determine the suitability of sites, but Table 2.2 of the SHLAA document explains why some sites were excluded at Stage 1 of the assessment because they were deemed to not fit the Council's strategy.
- 2.12 This might be interpreted as proof that the Council has chosen its preferred course of action prior to carrying out more tests. Out of pure disagreement with the unreasonable choice to reject all edge of urban area sites and restrict any possible contribution from this element to the spatial plan, it has also opted not to take into account all alternative site options in this location despite the urban edge being not only a clear reasonable alternative in terms of strategy options but in-fact comprising a component of the selected strategy.
- 2.13 Within the SA all sites adjacent to the urban area are equally assessed to be undesirable, save for two sites, since they are in conflict with the spatial plan. Any edge of urban area locations are considered inconsistent, despite the fact that sites seemingly dismissed without reason could contribute to green infrastructure and recreational priorities – which is specifically the case with our client's land at Green End Kempston as demonstrated by its proximity to the selected draft allocation HOU13 at Gibraltar Corner. The conclusion that the suitability of site options should not be further evaluated or that strategy options for levels of growth on the edge of settlements should not be tested in greater detail or through more iterations than were done prior to the Regulation 18 consultation stage cannot be supported by the use of this circular reasoning.
- 2.14 We continue to have some reservations regarding how sustainable sites put forward within Kempston Rural parish have been treated in terms of distributing growth in relation to



communities within the 'south' transport corridor and well-related to the principal settlement at Bedford. More concerns are raised about the Council's growth distribution strategy, which only mentions homes and ignores the means required to address the housing needs of different groups, including for example specialist housing for older people or self-build property both of which could be explored further as part of the allocation of additional small and medium-scale sites at the urban edge including our client's land at Green End.

- 2.15 The SHLAA confirms in respect of our client's land that the site has not been subject to more detailed testing on the basis that it does not accord with the preferred spatial strategy. We consider that the site, if applying a hybrid approach that would (as is already the case in the selected strategy) support the prioritisation of development around sustainable urban edges without undermining the wider need for some growth at Key Service Centre and Rural Service Centre settlements within the Council's settlement hierarchy. Maximising the contribution from urban edge sites could make an important contribution when it comes to delivering housing, offsetting a reliance on strategic scale growth elsewhere within the Plan for Submission which often delivers at a much slower pace than small-to medium sized sites.

**c) Reliance on a Proposed Stepped Trajectory**

- 2.16 Current issues with the sluggish and delayed delivery of allotted sites would be made worse by the Council's trajectory for the Local Plan 2040, making even its recommended "stepped approach" to housing requirements ineffective. An over emphasis on strategic scale development is to blame for this. The absence of adequate evidence to show that rail-based growth in the A421 corridor is practicable, deliverable, or developable before years 11 through 15, if not sooner, substantially undermines the Council's argument (and at the delivery rates indicated).
- 2.17 This creates a problem with supply that arises very immediately and can only be sensibly managed by dispersing development via small- to medium-sized sustainable sites throughout a wider spectrum of areas. According to the NPPF and NPPG guidelines, allowing for a "hybrid" growth plan, as regularly recommended by our clients, will assist prevent market saturation and improve vitality of both urban and rural settlements.
- 2.18 The Council's decision to use a stepped trajectory is a reaction to past planning errors as well as to widespread concerns about the planned spatial strategy and reliance on major strategic 'new settlement'-scale locations for expansion. The suggested strategy is a mathematical ruse in order to maintain the yearly demand in the approved Local Plan 2030 for the sake of allegedly proving a Five-Year Supply upon approval (at least under the Council's calculations). It does not render a strategy that is essentially flawed "sound."

2.19 The Council is unable to adequately defend its reliance on a stepped trajectory because it has not given enough consideration to reasonable alternatives or the related concern of ensuring that all sites are objectively assessed in terms of their suitability rather than excluded on general grounds of inconsistency with the chosen strategy. This is due to the strategy's reliance on a stepped trajectory and the Council's inadequate consideration of reasonable alternatives. It is evident that there is a lack of a meaningful evaluation and reasoning at paragraph 9.14 of the April 2022 Sustainability Appraisal report relating to the stepped trajectory, the assessment of non-stepped options and without any recognition of the dis-benefits of deferring meeting housing need. This aspect of the Sustainability Appraisal is severely confined in its content and has blank space where evidence to support the approach would be anticipated.

2.20 Aligned to identified concerns in respect of the stepped trajectory and approach to site assessments, we consider it necessary that the Council, through a Main Modification, recognise the benefits associated with our client's land at Green End, and the ability of the site to contribute to delivery in early stages of the Plan period.

2.21 The proposed main modification to policy DS5(S) would be as follows;

**Figure 3. Proposed Modification to Policy DS5(S)**

*"In accordance with Policies DS3(S) and DS4(S), growth will be distributed as follows;*

<b>Location</b>	<b>Dwellings</b>	<b>Employment land (ha)</b>
<i>Within the urban area</i>	1,200	5*
<i>Strategic locations adjacent to the urban area which contribute to delivering the Forest of Marston Vale (<b>Gibraltar Corner &amp; Green End, Kempston</b>) incorporating the Bedford Milton Keynes Waterway Park and Bedford River Valley Park,</i>	<b>1,620</b>	7
<i>Growth locations on the A421 transport corridor and with the potential for rail based growth</i>		
<ul style="list-style-type: none"> <li>• <i>South of Bedford including new settlement</i></li> <li>• <i>Little Barford new settlement</i></li> <li>• <i>Other employment sites</i></li> </ul>	7,050 3,800 -	70 4 50
<i>Some development will take place beyond the end of the plan period</i>	400	
<i>Remaining rural areas / villages</i>	<i>Completion of sites previously allocated in local plans and neighbourhood plans</i>	

#### **d) Site Assessment Including Contribution towards Green Infrastructure**

- 2.22 It is also pertinent to note in respect of the site assessment process that there appears to be considerable inconsistencies in the way sites within the same component of the spatial strategy have been assessed in the HELAA.
- 2.23 This is true of the way in which the proposed allocation at Gibraltar Corner (Site ID: 636) and our client's land at Green End (Site ID: 1247) have been considered in the SHLAA, despite the fact that they are adjacent to each other, as demonstrated on in the appended and update Site Analysis Document at Appendix 1. In particular we refer to the fact that against three scoring criteria, namely 5a. (Likely to increase future economic and employment opportunities), 11a. (At risk of flooding) and 15c. (Accessible on foot to a primary school), the Green End site scores better than the Gibraltar corridor site (ID: 636. The scores for all other categories the same for both sites.
- 2.24 It is therefore surprising to see that the Green End site did not progress for further assessment on the basis of conflict with the preferred spatial strategy alone, whilst no such outcome was referenced in respect of Gibraltar Corner. The SHELAA assessment for the Gibraltar Corner site provides no specific details under the Stage 2 assessment conclusions to determine why the location is specifically assessed as suitable taking account the Council's specific objectives for Green Infrastructure or concerns regarding maintaining separation with the main town.
- 2.25 The distinction between the proposed allocation at Gibraltar Corner (HOU13) and our client's land arises where the draft allocation is subject to separate Sustainability Appraisal in Appendix 9 assessing the policies within the Plan for Submission. However, the findings of this part of the assessment do not indicate why the site should not be considered alongside other reasonable alternatives to the same degree of detail. Specifically:
- For Objective 8 the HOU13 assessment only identifies uncertain effects regarding protecting and enhancing landscape character
  - For Objective 7 (encouraging and supporting physical activity) minor positive effects arise only because the location is 'close to open space'.
- 2.26 The conclusions against these objectives, which are essentially critical for site selection, therefore do not distinguish the site from other reasonable alternatives. In relation to Objective 8 the SHELAA Stage 3 assessment for our client's land ID: 1247 records the same 'uncertain' position for landscape and townscape. For objective 7 the assessment conclusions for our client's ID: 1247 (potential negative effects for open space) are disputed where the submitted Site Analysis Document clearly shows scope for provision of open space

within the site boundary including specifically opportunities for new planting along its eastern edge to maintain separation with the main urban area.

- 2.27 Other parcels within the HOU13 location (e.g., Site ID: 636) record potential negative effects for objective 7. The HOU13 Appendix 9 assessment cites *“development of this site together with others will have positive cumulative and synergistic effects on the provision of green infrastructure”*. While this may indeed be the case to support the Council’s position for site selection, the same position is also true in relation to our client’s Land at Green End where had the land been assessed in the same degree of detail as other options it would make a valuable contribution towards wider Green Infrastructure objectives.
- 2.28 As is detailed in the Regulation 18 representation, the site sits beyond the Bedford to Milton Keynes Green Infrastructure Opportunity Zone (Policy AD24) and is not subject to proposals for further planting as part of creation of the Forest of Marston Vale (Policy 36S) but could make a valuable contribution towards both of these policy aims.
- 2.29 As demonstrated by our client’s updated Site Analysis Document we fundamentally object to the Council’ proposed changes to the Policies Map no longer indicating the boundaries of Policy AD24 regarding the Marston Vale GI Opportunity Zone.
- 2.30 Our client’s land has ostensibly the same relationship with this area as parts of the area identified for allocation at Gibraltar Corner (see Analysis Document (pp.11). It is relevant to note that this is an element assessed favourably in the Council’s SA conclusions for Site ID: 1333 and the assessment of draft allocation HOU13 and which the Council utilises to justify further consideration of the specific urban edge location at Gibraltar Corner. It cannot, therefore, be justified to exclude our client’s land as inconsistent with the selected strategy when it achieves ostensibly the same assessment conclusions and provides the same potential benefits, set out under Objective 2d of the Stage 3 SHELAA SA Indicators as: *“adjoining the green infrastructure opportunity network and able to enhance the network”*.

#### **e) Conclusions**

- 2.31 We therefore **object** to policies **DS2(S), DS3(S), DS(5) and the Sustainability Appraisal**. The approach is **not legally compliant** in respect of the Sustainability Appraisal and **Duty to Cooperate** processes and **fails all four soundness tests**.
- 2.32 This Statement explains why the site should be assessed in the context of complementing the existing spatial strategy when assessing the overall requirement for Modifications. It would therefore be appropriate to provide support for its allocation through changes to Policies DS2(S) and DS5(S), without materially affecting the submission version Plan.

**APPENDIX 1 REPRESENTATIONS TO LP2040 PREFERRED OPTIONS AND DRAFT  
POLICIES CONSULTATION (SEPTEMBER 2021) (ID: 1247 / REP ID: 8572)**

**(UNDER SEPARATE COVER)**

G5116/1PS – Land at Green End, Kempston  
Bedford Local Plan 2040 Regulation 19 Consultation  
Bedfordia Developments Limited

**APPENDIX 2      UPDATED SITE ANALYSIS TECHNICAL DOCUMENT – LAND AT GREEN  
END, KEMPSTON**

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# GREEN END ROAD, KEMPSTON

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Site Analysis Document



DRAFT

18h July 2022

## Site Location

— Site Boundary



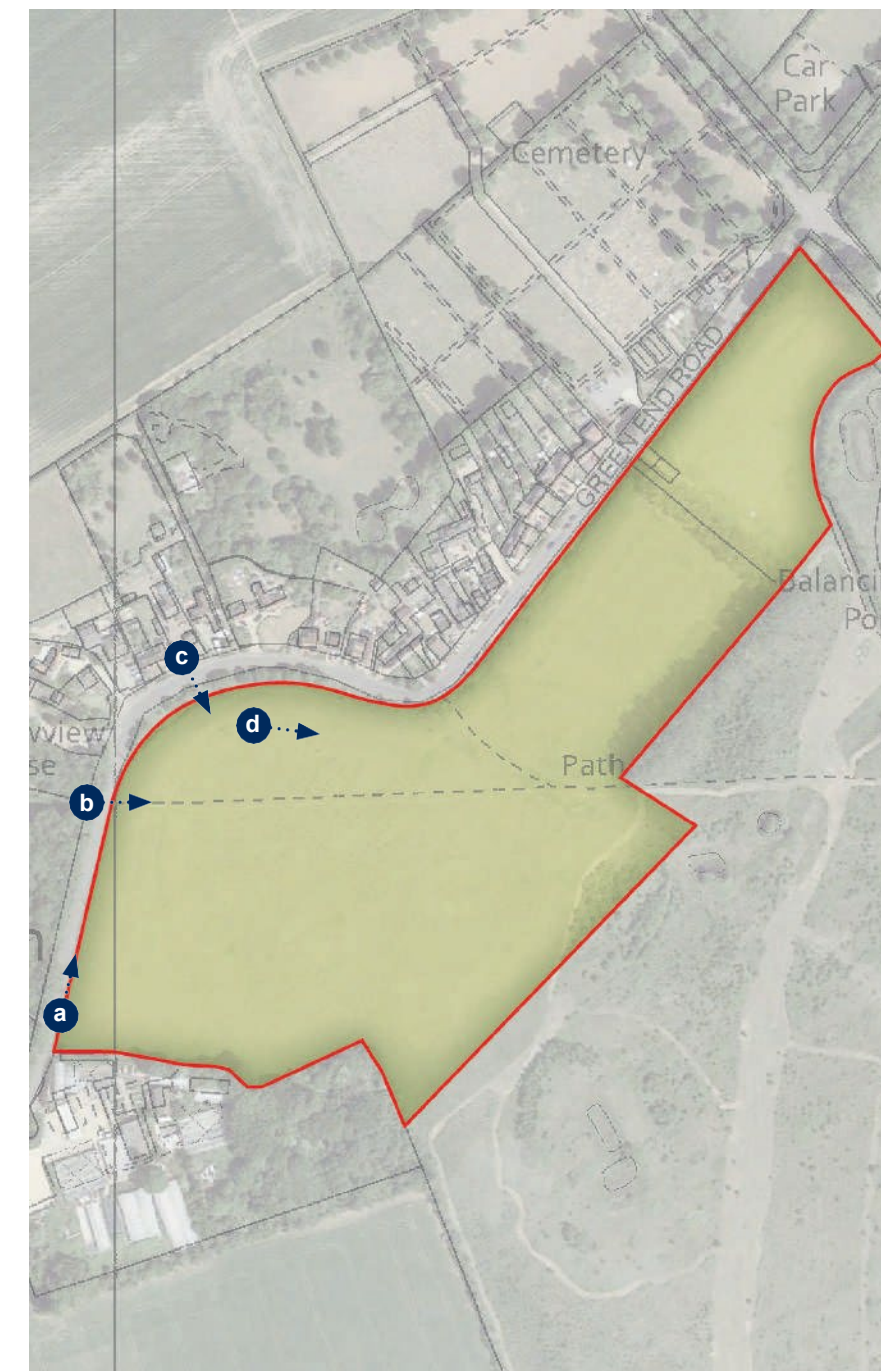


## Site Location (3D)

— Site Boundary



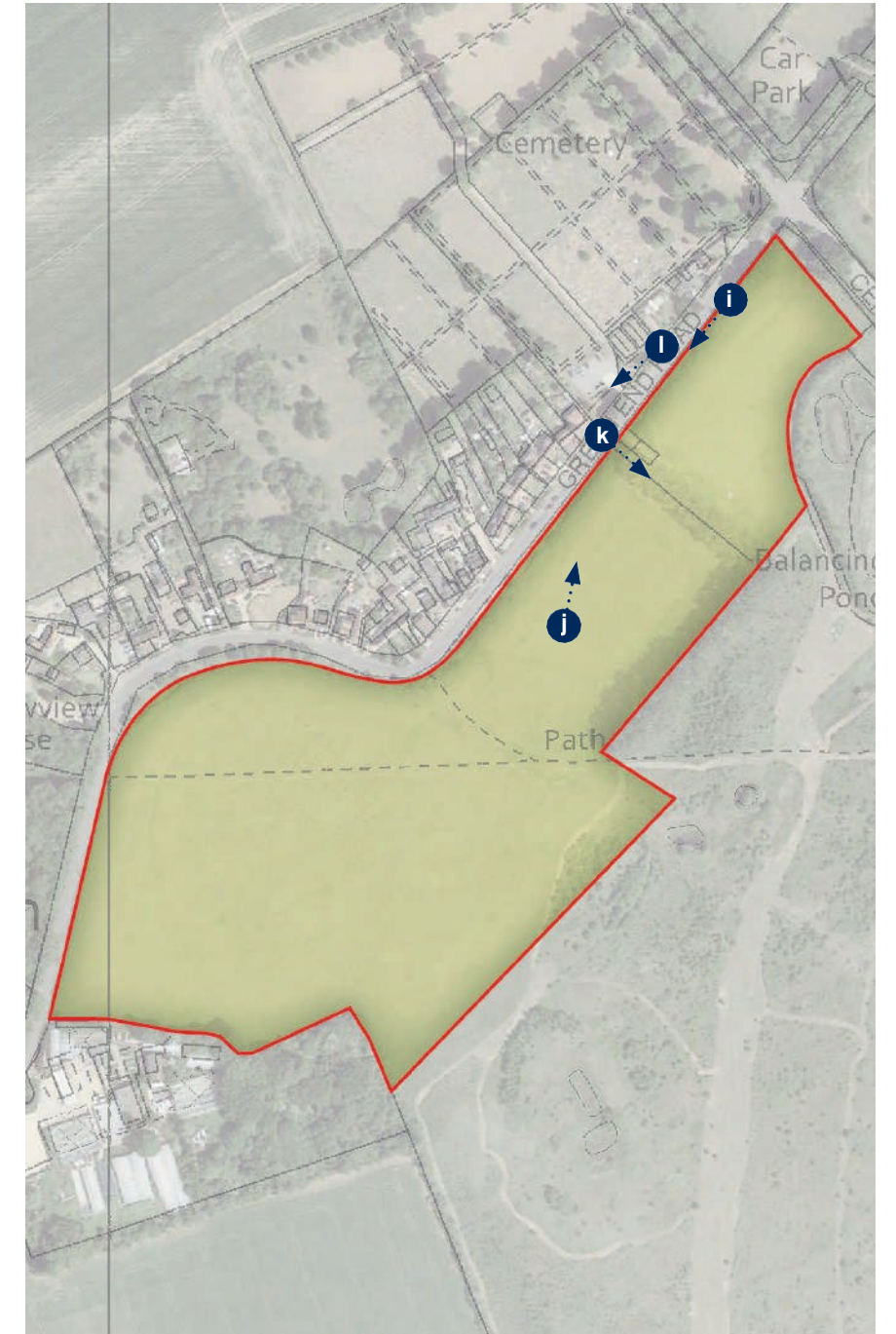
# Site Photos



# Site Photos

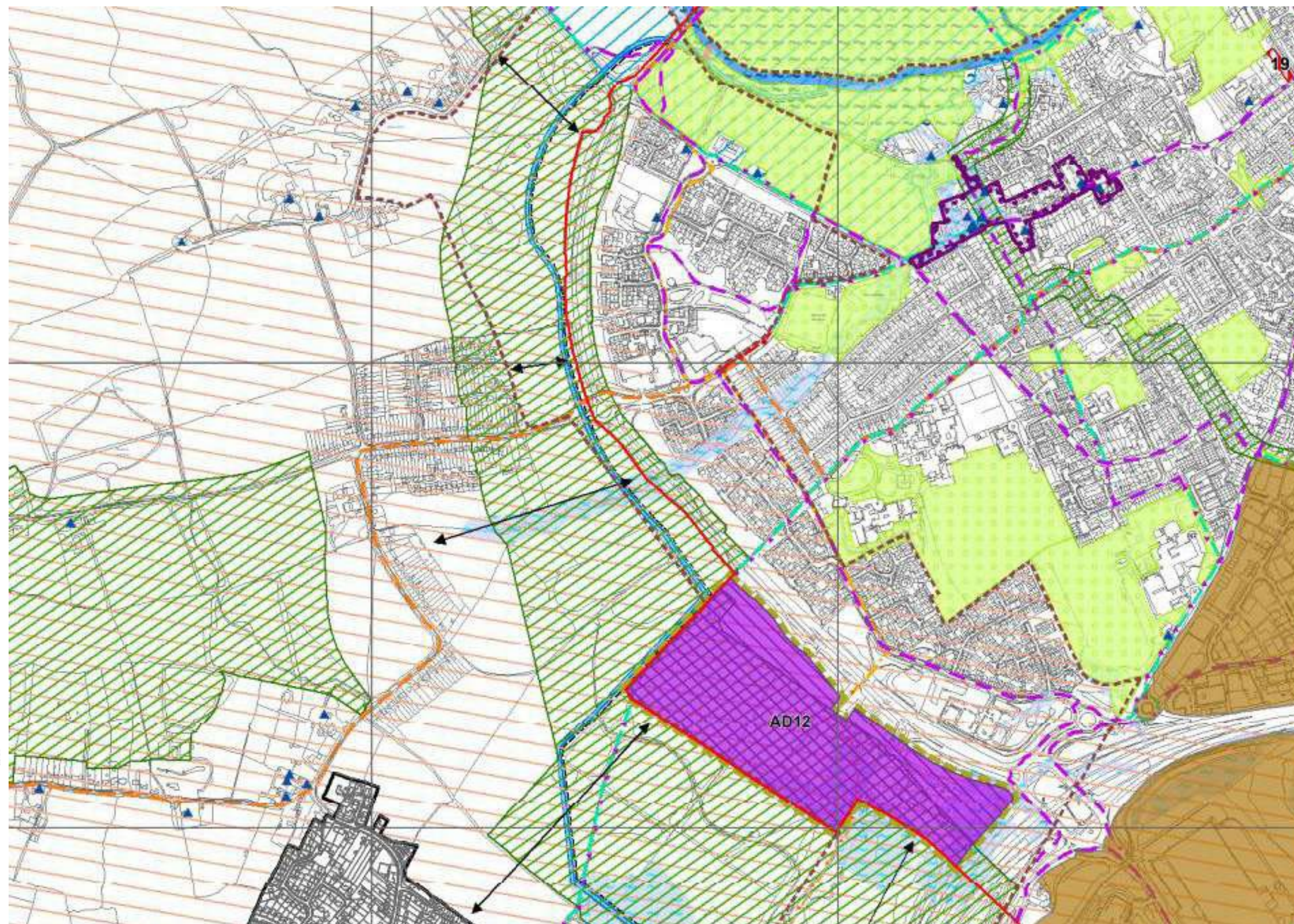


# Site Photos



# Bedford & Kempston Policy Map

- Inset Areas (see individual Inset Maps)
- Urban Area Boundary - AD41
- Listed Buildings - 41S
- Scheduled Monuments - 41S
- Housing - 12, 14, 19, 20, 21, 22, 23, 24
- Housing Development Site - H2, 6, 7, 8, H12, H14
- Employment - 70, 71**
- Monitor and manage - 71
- Protect and develop - 70
- Protect and enhance - 70
- Protect and maintain - 70
- Employment Allocation Sites - E2
- Hotel Allocation Site - AD18
- Employment Allocation Boundary - AD7, AD11 to AD17
- Local Gap - AD42
- Urban Open Space Gap - AD43
- Pedestrian Route - AD36
- Conservation Areas - 41S
- Primary Shopping Area - 79
- Primary Shopping Frontage - 15, 80
- Secondary Shopping Frontage - 15, 80
- Local Centre - 81, 82
- Safeguarding Zone - 90S
- Cycle Routes- AD39**
- Existing Cycle Route - AD39
- Proposed Cycle Route - AD39
- Cycle Route Requiring Improvements - AD39
- Sustrans Route - AD39**
- Existing Sustrans Route 51 - AD39
- Proposed Sustrans Route 51 - AD39
- Sustrans Route 51 requiring improvements - AD39
- Local Nature Reserve - 42S
- SSSI - 42S
- County Wildlife Sites - 42S
- Bedford River Valley Park - AD26
- Bedford River Valley Park Enabling Development - AD23
- Registered Parks and Gardens - 41S
- Travelling Showpeople Site - AD19
- Urban Open Space - AD43
- Local Green Space - 45
- Green Infrastructure Network Opportunity Zones - AD24**
- 1. Milton Keynes to Grafham Wooded Wolds
- 2. Upper Great Ouse River Valley
- 3. Lower Great Ouse River Valley
- 4. Bedford to Milton Keynes - Marston Vale
- 5. Greensand Ridge Fringes
- 6. Bedford Northern Fringes
- Forest of Marston Vale - 36S**
- Forest of Marston Vale



# Bedford & Kempston Policy Map, Changes to Policies Map April 2022



# Opportunity & Constraints

## Constraints

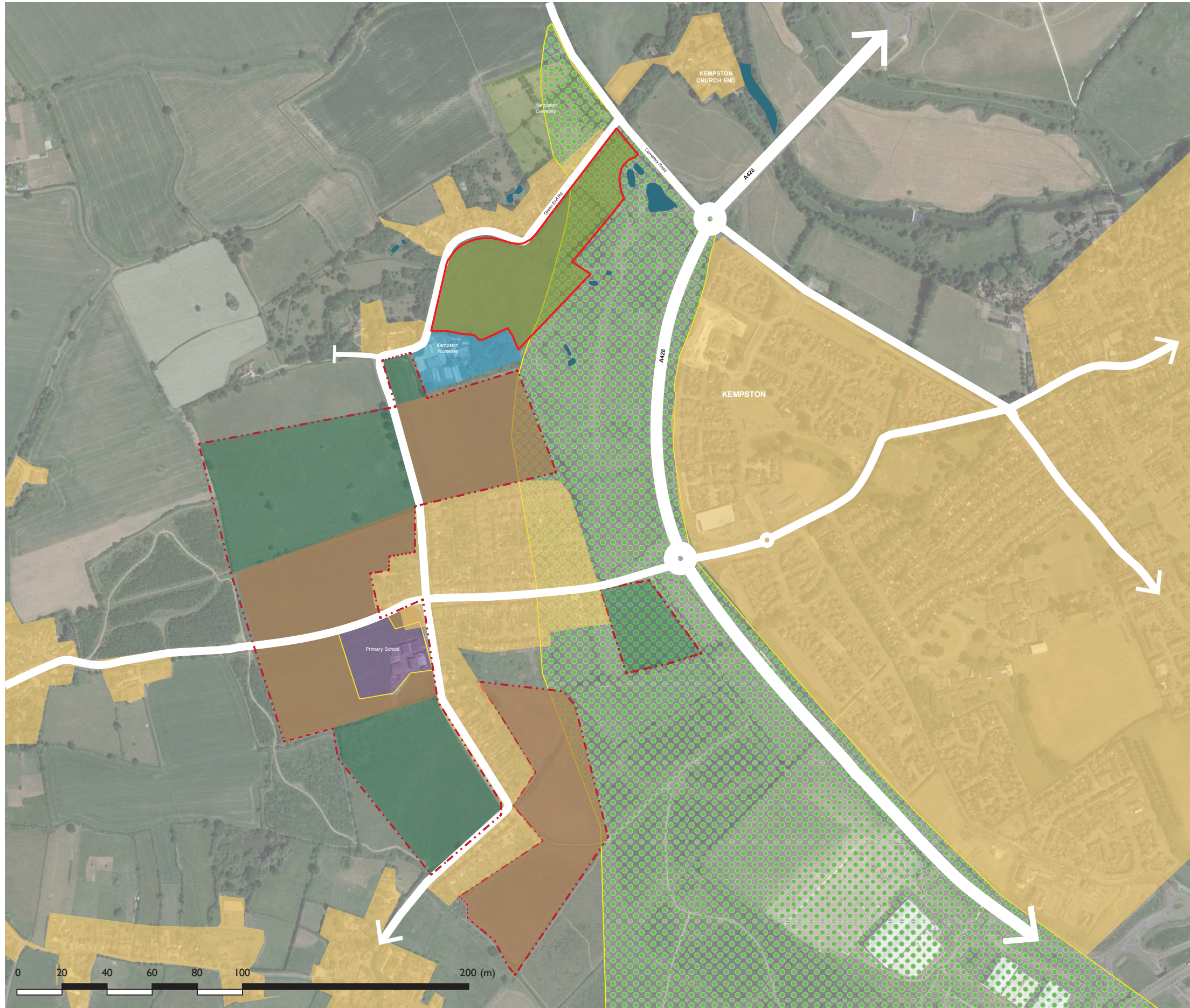
- Part 'land locked' site as primary vehicular access points are limited to Green End Road and/or via Cemetery Road;
- The structure of Green End settlement, including the setting of listed cottages and Kempston House;
- A Public Rights of Way (footpath A6) crossing the site diagonally from west to east will require incorporating into the proposed scheme;
- Possible vehicular access (southernmost) off Green End Road would likely require an extension of the 30mph speed limit, street lighting and footway infrastructure to be provided. Alternatively, BBC design guidance advises that a single point of access could serve up to 300 dwellings. In light of this, the site (should it be developed in its entirety without any severance) could promote just one point of access via the northernmost access;
- The Site Assessment form sets out how access is also feasible from Cemetery Road. Cemetery Road is subject to a 40mph speed limit with street lighting and an existing footway on the opposite side of the carriageway. Vehicular access within the site frontage should comprise a 5.5m carriageway with 2m footways and likely require visibility splays of 120m, which would appear to be achievable. Alternatively, amendments to the existing TRO could be investigated to reduce the speed limited to 30mph. There appears to be a drainage ditch along the southern edge of Cemetery Road which would need to be culverted as part of any access at this location.
- If no vehicular access is proposed along Cemetery Road, it is highly recommended that a pedestrian / cyclist access is proposed in this location, to connect into the existing infrastructure.
- Existing vegetation, particularly linked to existing hedgerows and tree groups, would need careful consideration and incorporation into the scheme;
- Landscaped buffer along the site's eastern edge will be required to facilitate transition from potential development to the Marston Vale newly planted area and Local Gap AD42 between Green End and Kempston; and
- Views from Green End Road eastward into the site will require screening to mitigate the potential development's impact on the landscape.

## Opportunities

- An opportunity to provide an interlinked network of sustainable routes within green corridors to enhance pedestrian and cycle routes in the locality, along the Public Rights of Way and existing vegetation, also enhancing biodiversity and supporting existing habitats;
- The site is outside fz 2 and 3 and therefore provides an opportunity for a residential development;
- Situated approximately 1.6km to the west of Kempston High Street and its facilities, the site presents a potential for residential expansion along the eastern side of Green End Road with low densities in a landscape setting appropriate to Kempston Rural setting;
- Vehicular access off (northernmost) part of Green End Road, located within a 30mph speed limit with street lighting and an existing footway on the opposite side of the carriageway, is considered a suitable location (for accessing residential development) and would require connecting into the existing footways.
- From an access at Cemetery Road, there is an opportunity to extend the existing shared footway / cycleway facility from the A428 / Cemetery Road roundabout towards the site along the northern edge of the carriageway. This would be the key desire line for future residents travelling to Kempston Town Centre. Alternatively, there appears to be adequate verge width along the southern side of Cemetery Road to provide a new footway along the site frontage which would extend east towards the A428 roundabout.
- The closest bus stops are also located on Cemetery Rd to the southeast, approximately 400m from a potential access at Cemetery Rd, or circa 700m from the centre of the site. The stops are served by Route 24, operating at an hourly frequency, between Great Denham and Bedford.
- Public footpath 'A6' and '39' are located within the site, noting that footpath A6 extends beyond the site northeast towards the A428 roundabout. There could be an opportunity to improve this PROW so that it is more attractive for future residents, as it provides a shorter route for residents within the southern parcel of the land to the bus stops and Kempston Town Centre, linking to local facilities such as schools, small retail facilities, churches, pub and employment areas. Footpath 19/A6 enters the site from the southwest and forms part of an important rural pedestrian link between Green End and Kempston, and footpath 15/39 provides further permeability, offering a potential for enhanced connectivity to further north to Box End; and
- Promoting and achieving the long-term target of 30% woodland cover within the Marston Vale area.







- Key:**
- Site Boundary

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  - Existing Settlement
  - Existing Employment
  - Potential Development Area
  - Green Space
  - Proposed Policy HOU13: Allocation of Land at Gibraltar Corner (Adjacent to the Urban Area)

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  - Marston Vale GIN Opportunity Zone







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