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For and on behalf of
Bedfordia Developments Ltd

**BEDFORD LOCAL PLAN 2040 –
DRAFT PLAN STRATEGY OPTIONS AND DRAFT POLICIES CONSULTATION**

Land at Green End, Kempston – LPA Ref: 1247

**Prepared by
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September 2021



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1.0 INTRODUCTION AND STRUCTURE OF REPRESENTATIONS

- 1.1 This representation has been prepared by **DLP Planning Ltd (DLP)** on behalf of **Bedfordia Developments Ltd (Bedfordia)** in response to the ‘Bedford Local Plan 2040 – Draft Plan Strategy Options and Draft Policies (Regulation 18) Consultation’.
- 1.2 This representation relates to Land at Green End, Kempston. The site, extending to circa 7 ha, comprises an area of grassland and lies well-related to the urban area on the western side of Kempston and within Kempston Rural Parish. There are no overriding constraints or site specific designations that would prevent the development of the site. A location plan identifying the site is provided at Appendix 1. Appendix 2 comprises the output of Site Analysis undertaken on behalf of our client to recognise the existing context for development, patterns of land use, potential constraints, and high-level access feasibility in order to identify those areas of the site most suitable for development.
- 1.3 DLP, on behalf of Bedfordia, welcomes the Council’s decision to review and update the various elements of the extant Development Plan and provide for a new Local Plan document that will fully reflect the policies of the National Planning Policy Framework (the Framework) and provide for the up-to-date development needs of the Borough and its residents in a sustainable manner.
- 1.4 DLP wishes to make a number of comments on the consultation document as part of the background context to the representations we are submitting on the site itself.
- 1.5 Bedfordia have concerns over the past failings of the Borough to capitalise on its locational context and the previous long-standing planning strategy that saw a concentration of development on the urban areas of Bedford and Kempston and the parallel restraint of development in rural areas. This as we have detailed elsewhere has failed to recognise the potential and capacity of rural settlements and their need for growth, and a corresponding reduction in rural service provision and the consequences of that.
- 1.6 This representation specifically addresses those elements of the Council’s Preferred Strategy Options that do endorse the potential for further village-related growth in the ‘south’ corridor parishes within the Borough, which include Kempston Rural. In keeping with submissions covering our client’s wider interests, endorsement of the distribution of growth to the ‘south’ corridor parishes, as part of an appropriate strategy, sits within the fundamental

concern that the Council must adopt a ‘hybrid’ approach to provide flexibility and choice. This would overcome soundness failings relating to an overreliance on large strategic sites together with securing the benefits of early delivery and a contribution to the Plan’s wider objectives and specific land use requirements.

- 1.7 In the case of our client’s land at Green End, Kempston, these representations specifically request that the opportunity identified for development is assessed in terms of the ability to provide for **specialist accommodation for older people** (notably under the Extra Care / retirement village concept) and/or general residential (C3) development.
- 1.8 **Section 2.0** addresses specific comments on the Council’s Preferred Strategy Options and Preferred Option Policy Proposals together with their supporting evidence.
- 1.9 **Section 3.0** discusses the suitability of our client’s land for development including a response to the Council’s Site Assessment Proforma.

2.0 OBSERVATIONS AND REPRESENTATIONS – PREFERRED STRATEGY OPTIONS AND PREFERRED OPTION POLICY PROPOSALS AND EMERGING EVIDENCE

2.1 This section addresses the Council's the Published Consultation Document.

Paragraphs 3.15 – 3.17 (Spatial Strategy Options) – Comment

2.2 The identification of growth in the 'south' corridor as part of the Council's Preferred Options 2a, 2b and 2d is welcomed in principle. This is considered to form an important component of any appropriate strategy option albeit this will require recognition of the benefits of 'village-related' growth across the settlement hierarchy.

2.3 The identification of Kempston Rural parish within this corridor is also welcomed. This is considered to reflect the excellent links between the development pattern within the parish (particularly at Green End) and services and facilities within the urban area. Where the Council identifies figures of 2,000 and 1,500 respectively for 'south' corridor parishes in Options 2a and 2b without specifying any settlement-specific or site-specific distribution it is assumed that this recognises the capacity to sustainably support growth at Green End.

2.4 Reservations are expressed, however, in terms of the Council's treatment of Kempston Rural for the purposes of apportioning village-related growth, where the parish is excluded from the relevant total of 4,280 units as a result of not comprising a designated Rural Service Centre. Further reservation is expressed in terms of the distribution of growth in the Council's Preferred Options where this refers only to dwellings and not the approach required to deliver the housing needs of different groups, including specialist housing for older people.

2.5 The Council's own evidence base identifies a substantial need for housing for older people, including a net demand for over 1,500 units of Extra Care accommodations (owned and rented) over the Plan period. However, the Council's Sustainability Framework (Appendix 1 of the draft Sustainability Appraisal findings) indicates that the positive effects associated with meeting particular housing needs will only be weighed when testing site-specific development options.

2.6 The implication of this is that the Council intends to reject altogether strategy options providing for 'village-related' growth outside of the 'east' and 'south' corridor parishes and may opt for lower levels of development in the 'south' corridor prior to assessing all site

specific reasonable alternatives.

- 2.7 Our client's land at Green End, Kempston, is a good illustration of why a flexible approach to testing needs to be adopted and why the parish has correctly been identified as an area with overall potential for development. At this stage the Council's evidence has no regard to whether its Preferred Strategy options - heavily reliant on large-scale strategic growth with potential constraints to land availability, viability, and development timescales – would be capable of meeting specialist housing needs for older people over the Plan period.
- 2.8 In contrast, our client's land at Green End (in-keeping with other opportunities in the rural area) satisfies the key characteristics of sites suitable to provide for retirement village schemes in terms of its scale, location, and accessibility. The benefits of the potential to provide specialist housing for older people in this location should remain subject to further assessment (alongside general needs housing) due to the ability to contribute towards overall development needs. This is irrespective of the strategy options selected by the Council to meet the minimum need for new residential allocations. Recognition of this underpins our clients broader argument that meeting the requirements for preparation of the Local Plan 2040 must rely upon a flexible, 'hybrid' approach.

Paragraphs 3.10 and Preferred Options 2a-2d: Component of Rail-Based Growth 'Pink' Growth Strategy Options) – Object

- 2.9 The opportunity for transformative change resulting from the delivery of East-West Rail within Bedford Borough is not disputed. However, the Council's own evidence demonstrates that the level of rail-based growth at Kempston Hardwick/Stewartby and Wixams relied upon as part of its Preferred Options is unsound. National Planning Practice Guidance ID: 68-020-20190722 states that a pragmatic approach should be taken when considering the intended phasing of sites, where the authority may need to provide a greater degree of certainty than those in years 11-15 or beyond. The PPG expands on this by stating that where longer-term sites are relied upon evidence must be available to demonstrate that they will come forward within the timescales envisaged and at a rate sufficient to meet needs over the plan period (ID: 68-019-20190722).
- 2.10 While these sections of the PPG post-date the NPPF2012 it is the case that the Council has historically failed entirely in setting out realistic timeframes for the development of complex sites. These shortcomings have particularly affected Town Centre sites in the past, which the

Council will now unsuccessfully rely upon to sustain completions against the housing requirement in the Local Plan 2030. We argued at the previous Local Plan Examination that such sites should be identified as developable no earlier than the 11-15 year period.

- 2.11 These issues with existing sites will be compounded in the Council's trajectory for the Local Plan 2040 (meaning that even its proposed 'stepped approach' against a requirement of 970dpa to 2030 will not be effective). These representations further demonstrate the lack of evidence to consider rail-based growth in the A421 corridor as developable any earlier than years 11-15 of the plan period (if not beyond) thus rendering the Council's Preferred Options entirely unsound.

Reasoning

- 2.12 The Council's own Development Strategy Topic Paper identifies multiple risks to the rail-based component of growth in the A421 corridor, including:

- Delivery of new rail stations is proposed, but not yet confirmed.
- Lead in times for remediation of the Kempston Hardwick area and delivery of new rail stations mean that development in this part of the transport corridor will occur later in the plan period.
- Detailed analysis of context and density / storey heights to establish appropriate place making for the rail based growth at Kempston Hardwick and Stewartby has yet to be undertaken.
- The land at Kempston Hardwick is currently being promoted for employment development.

- 2.13 These points confirm that the Council's extremely wide range of potential quanta for the development of rail-based growth are not currently informed by evidence of site-specific opportunities assessed as suitable, available, or achievable. This means that there is no justification whatsoever for the levels of development summarised at paragraph 3.12 of the Council's Topic Paper:

*“Transport corridor – rail based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams. On the assumption that new rail stations will be delivered at Wixams and Stewartby / Kempston Hardwick, ambitious growth is assumed at both Wixams and Stewartby / Kempston Hardwick in the range of 1,500-3,000 dwellings at Wixams and 2,500-5,000 dwellings at Stewartby / Kempston Hardwick **by 2040**. Within the options two levels of development are tested: a lower option total figure of 5,500 dwellings (2,000 at Wixams and 3,500 at Stewartby / Kempston Hardwick) and a higher option of 7,500 dwellings (3,000 at Wixams and 4,500 at Stewartby / Kempston Hardwick)”*

2.14 There is no evidence to indicate these totals as developable in the period to 2040. In the absence of site-specific testing the Council can have no grounds to suggest how constraints might be overcome, when infrastructure will be provided and whether the extremely high levels of development required to meet these totals over a very short period between sometime after 2030 and 2040 can be achieved.

2.15 The extent of this uncertainty is summarised in footnote 1 on pp.8 of the Development Strategy Topic Paper:

“East West Rail are currently consulting on two options for the Marston Vale Line; one which retains the current stations at Stewartby and Kempston Hardwick, and another that replaces them with a new station (tentatively named “Stewartby Hardwick”) at Broadmead Road. This component of growth is based on development around the new or existing stations in conjunction with development around the new station at Wixams. These stations could provide a focal point for higher density growth supported by the sustainable travel options offered by new and enhanced rail services.”

2.16 The consultation referred to recently closed in June 2021 and final decisions on the ‘Concept’ for stations on the Marston Vale line are awaited. For the avoidance of doubt, the expected timeframes set out in the most recent Consultation Document indicate that a Development Consent Order may be obtained by 2024 and construction on the rail works may commence in 2025. However, this does not provide a clear timetable for the delivery of individual projects and upgrades. Stage 05 (‘Construction’) is summarised as follows:

“Once we’ve complied with any initial conditions or requirements included in the Development Consent Order, the government will consider the full business case for the Project to make the final decision to proceed. Following further conversations with the public and stakeholders, can start to construct your new railway.”

2.17 The potential for residential development to occur in conjunction with the delivery of new stations as intended by the Council is likely to require a substantially longer lead-in timeframe.

2.18 The Council has previously acknowledged that longer lead-in timeframes must be allowed for as part of redevelopment of the Stewartby Brickworks (Policy 25) Development Plan allocation as it exists in the LP2030. The Local Plan trajectory anticipates delivery of only (at most) 100 units in 2029/30 before the end of the current plan period. The scheme is in effect accepted as an 11-15 year developable site.

2.19 Application proposals under reference 18/03022/EIA (validated November 2018) benefit from

an Officer recommendation to grant planning permission subject to S106 agreement. In practice, this does not alter any conclusions regarding the deliverability/developability of the site and likely timescales. Discussions surrounding the draft S106 obligation would be anticipated to be extensive. This is reflective of the constraints of the site and gaps in the evidence base for the LP2030, notably:

- Around 19ha of the site falls within Flood Risk Zone 2. Furthermore, a small proportion (around 1ha) is located within Flood Risk Zone 3a/3b.
- A requirement to confirm costs and timescales for the requisite link from the new development across the railway could be achieved (notwithstanding ongoing deliberations regarding East-West Rail). whilst Network Rail is identified as a key stakeholder for preparation of the Council's Infrastructure Delivery Plan (December 2018) no project associated with the rail crossing is identified, costed, or phased over the course of the plan period.
- The Council's Local Plan Viability Assessment (BNP Paribas, November 2017 (paragraph 6.16)) notes the requirement for significant investigations to assess on-site constraints for this complex site, with a view to preparation of a development brief, all prior to detailed viability work taking place.

2.20 It is our experience from monitoring the delivery of the nearby Wellingborough East Urban Extension that the construction of crossings over rail lines can take significant periods of time and are unpredictable.

2.21 The Officer Report in relation to the current position on securing a policy-compliant (and CIL122-compliant) package of contributions towards the site's ability to enhance use of rail-based transport states:

"Policy 25 iv. Sets out a need for enhancements to the existing railway station environment including accessibility, provision of facilities and security. If the railway station stays in its current location the increased permeability of the site will improve connections from the village to the station. The Railway Station however does not fall within the application site and is under review as part of the wider East West Rail scheme, details of which are not confirmed at this time."

2.22 Given this uncertainty we would anticipate it is highly likely that a S106 obligation may not be entered into until these uncertainties are resolved or that otherwise it would be expected that this would be subject to future Deeds of Variation or revisions to the scheme resulting in delays to the delivery of housing.

2.23 The Council's Preferred Options also identify a contribution of around 2,000-3,000 further units to be allocated at Wixams, to correspond with eventual delivery of a further new station

as part of the wider scheme. These units will be additional to the remaining capacity identified in the Bedford Local Plan 2030 trajectory and units to be delivered as part of committed development in Central Bedfordshire's Local Plan (which already includes a Southern Extension to the scheme).

- 2.24 The longstanding issues with delivery of the Wixams New Station are illustrative of the impacts upon rates of development likely to be experienced at Stewartby/Kempston Hardwick. Evidence presented at LP2030 Examination demonstrated that the build-out rate of Wixams within Bedford Borough has been 96 dwellings per annum over the 10-year period to 2018. Development has since commenced in Central Bedfordshire, increasing the overall build-rate but corresponding with a reduction of activity in Bedford Borough.
- 2.25 Delivery of the Station has been delayed by over 11 years with the project still not expected to commence construction until 2023 at the earliest. Commissioning of a detailed design scheme for the proposed station was able to progress earlier in 2021 contingent on the basis of consultation on the proposed northern alignment of East-West Rail.
- 2.26 While any final decision is awaited on the outcome of the Bedford-Cambridge phase of East-West Rail there remains a risk that the time-limited period for funding available from the lead developers of the Wixams scheme will expire and result in the project not being delivered (or requiring additional monies to address the shortfall in project costs).
- 2.27 In the context of the above delays and uncertainty and in the absence of a clear timeframe for delivery of the station the Council's Preferred Options present no site-specific evidence of how the additional capacity at Wixams could be achieved over the plan period and at an appropriate build-out rate (in addition to the delivery of extant commitments).
- 2.28 The characteristics of any potential increase in allocations at Wixams also represents an issue of cross-boundary strategic importance, given that the scheme is being delivered across local planning authority boundaries and the requirement for partial review of the Central Bedfordshire Local Plan 2015 to 2035. This could lead to any potential for additional development being required to address the unmet needs of neighbouring authorities (or affecting the administrative boundaries within which the most appropriate land should be identified).

Remedy

- 2.29 These representations demonstrate that the rail-based growth component of the Council's Preferred Strategy Options requires substantial further refinement and site-specific testing. This is likely to substantiate a significant reduction in assumptions regarding the potential for development within the plan period, which can be effectively mitigated through pursuing a 'hybrid' strategy for development in sustainable locations across the Borough.

Paragraph 3.6 (Housing Needs of Different Groups / Older People)– Object

- 2.30 Paragraph 3.6 of the Council's Consultation Document sets out:

“The LHNA also provides the evidence base to update the policies of the Local Plan 2030 on these matters. Policy 58S Affordable housing and 59S Housing mix will be updated once the viability of the Local Plan as a whole has been tested.”

- 2.31 Without prejudice to any further evidence our client may submit at future stages of consultation, these representations highlight that the Council's own emerging evidence indicates an urgent and pressing requirement to address the needs of specialist housing for older people. The Council has failed to incorporate its own evidence of an urgent and substantial level of need into its own testing of strategy options and has further ignored other important material considerations regarding the importance of the sector. Failure to take account of this important element of the Plan's objectives renders the overall approach to plan preparation unsound: **not effective** and **not consistent with national policy**.

Reasoning

- 2.32 The evidence base generated by the LP2030 on the housing needs for older people is substantially out-of-date and pre-dates the latest version of the NPPF and specific guidance in the NPPG. This reflects the impact of a foreshortened plan period and the Council's reliance on an objective assessment of housing need substantially below that resulting from the government's Standard Method. Furthermore, the LP2030 makes no specific provision or allocations to provide sites to deliver the requirements for specialist accommodation.
- 2.33 The strategic policies of the Plan, with which Neighbourhood Plans under preparation must be in general conformity, provide no specific direction on how the housing needs of older people should be addressed. Neighbourhood Plans 'made' or currently under preparation in the Borough have generally not made any specific provision to address this important component of housing need.

2.34 The Local Housing Needs Assessment (LHNA) (Figures 10 and 67), prepared to inform the Council’s draft strategy and policy options, identifies a net need for over 1,500 units of Extra Care accommodation to 2040 (872 ‘owned’ and 632 ‘rented’ units). This level of need is derived from the Housing Learning and Improvement Network (Housing LIN) SHOP resource pack methodology (2012) referred to in Planning Practice Guidance. This level of need is principally a function of low levels of existing supply and very limited recent development of Extra Care for sale within the Borough (contrasting with an oversupply of traditional ‘sheltered’ accommodation).

2.35 Recent Appeal Decisions have reinforced that the notional prevalence rates applied through relevant toolkits should be treated with caution and are likely to provide a minimum starting point. In respect of the 45 units of Extra Care accommodation per 1,000 residents aged 75+ set out within the SHOP toolkit Inspector Stephens opined at Paragraph 40 of the Appeal Decision at Little Sparrows, Sonning Common, South Oxfordshire (PINS Ref: 3265861) that this:

“should be far more ambitious given not only the true tenure split in the District but also what it could mean for the ability to contribute towards addressing the housing crisis”

2.36 This reflects international comparisons with regards the rate of provision for specialist housing for older people and the potential additional benefits associated with freeing up family housing.

2.37 The House of Commons Housing, Communities and Local Government Committee also focuses upon the housing needs of older people in assessing the government’s proposals for ‘The Future of the Planning System in England’ (First Report of Session 2021-22¹). Paragraph 136 of that Report states:

“There should also be support and encouragement for local authorities to deliver specialist housing, particularly for elderly and people with disabilities. The Government should create a C2R class for retirement communities to ensure clarity in the planning process. There should be a statutory obligation that Local Plans identify sites for specialist housing”

2.38 This recommendation seeks to build upon the existing direction of travel in national policy and guidance. It should, however, be noted that the current Planning Practice Guidance

¹ <https://committees.parliament.uk/publications/6180/documents/68915/default/>

(updated in June 2019) identifies that Plans should consider the allocation of sites in circumstances where an unmet need is identified (ID: 63-013-20190626) and reinforce this with a positive approach towards decision-taking (ID: ID: 63-016-20190626).

- 2.39 Planning Practice Guidance also provides a non-exhaustive list of considerations for the development of age-friendly places (ID: 63-018-20190626). In terms of the specific locational and scheme requirements for retirement village schemes (including Extra Care) it is important that the site is of a sufficient size to secure a critical mass of services, facilities, and opportunities for care provision. Such schemes typically provide substantial benefits to the wider community in terms of access to social spaces and shared facilities.
- 2.40 The considerations set out in the relevant PPG can be sustainably addressed as part of one option for a scheme on our client's land at Green End, which would also enable easy access to services and facilities in the urban area (including pedestrian links and potential arrangements such as lift-sharing and community transport).

Suggested Approach / Remedy

- 2.41 There is an urgent requirement to update the provision for specialist accommodation for older people set out in Policies 59S and 60 of the Local Plan 2030, which are significantly out-of-date. These pre-date the latest iteration of national policy and guidance and are based upon an indication of a requirement for only 1,400 units of specialist accommodation to 2030 (see paragraph 10.18) as opposed to over 5,000 units to 2040 in the emerging evidence. The current policy position also fails to capture the broad range of provision possible to meet the requirements for specialist accommodation, including the retirement village concept, and thus present an outdated interpretation of the Use Classes Order.
- 2.42 These factors, taken together, also indicate a significant and urgent requirement to allocate specific sites to meet the specialist housing needs for older people as part of site selection to inform the submission draft Plan. For the reasons set out in these representations a 'general' approach that defers opportunities to large-scale strategic sites with long development timeframes will not be effective or consistent with national policy. Additionally, the deferral of site allocations to Neighbourhood Plans is likely to remain ineffective unless very clear direction of the requirement to make provision towards housing for older people is set out in the strategic policies in the Plan.

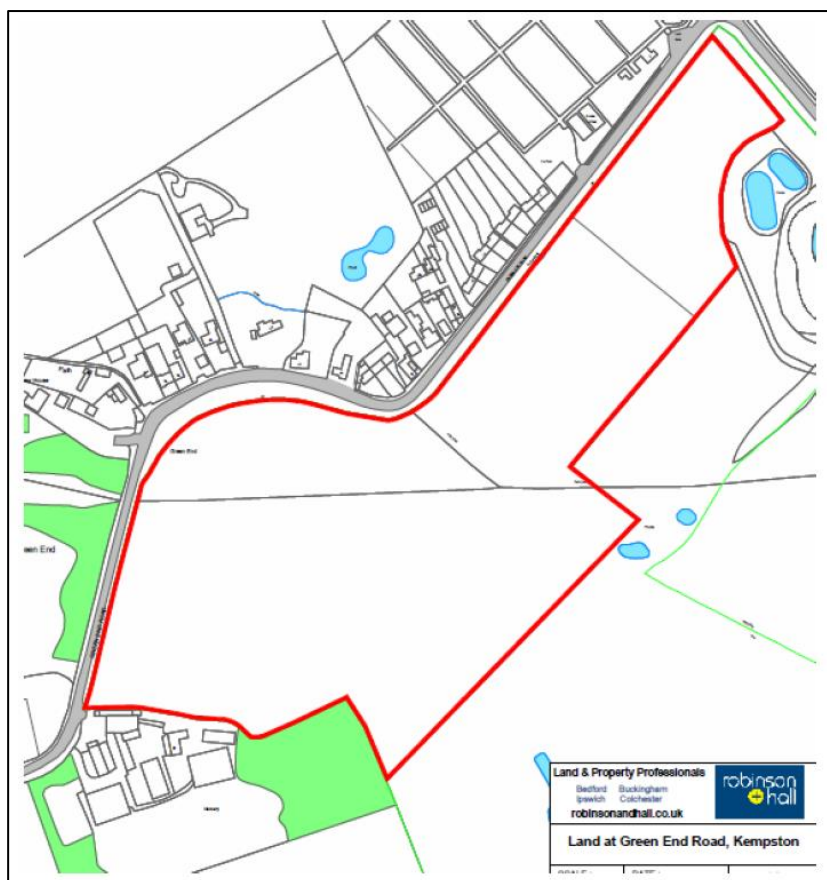
2.43 As such, our client's land at Green End, Kempston, represents an appropriate location to satisfy parts of the Council's substantial need for specialist housing for older people and should be assessed in detail as part of options for the site to be tested in detail at the next stage of plan-making.

3.0 RESPONSE TO SITE ASSESSMENT PRO-FORMA (CALL FOR SITES ID 663)

Introduction to Site and Proposals

- 3.1 The site was previously submitted to the Council for consideration as part of the Council's 'call for sites' exercise in August 2020. The land area being promoted is shown below.

Figure 1: Land at Green End, Kempston

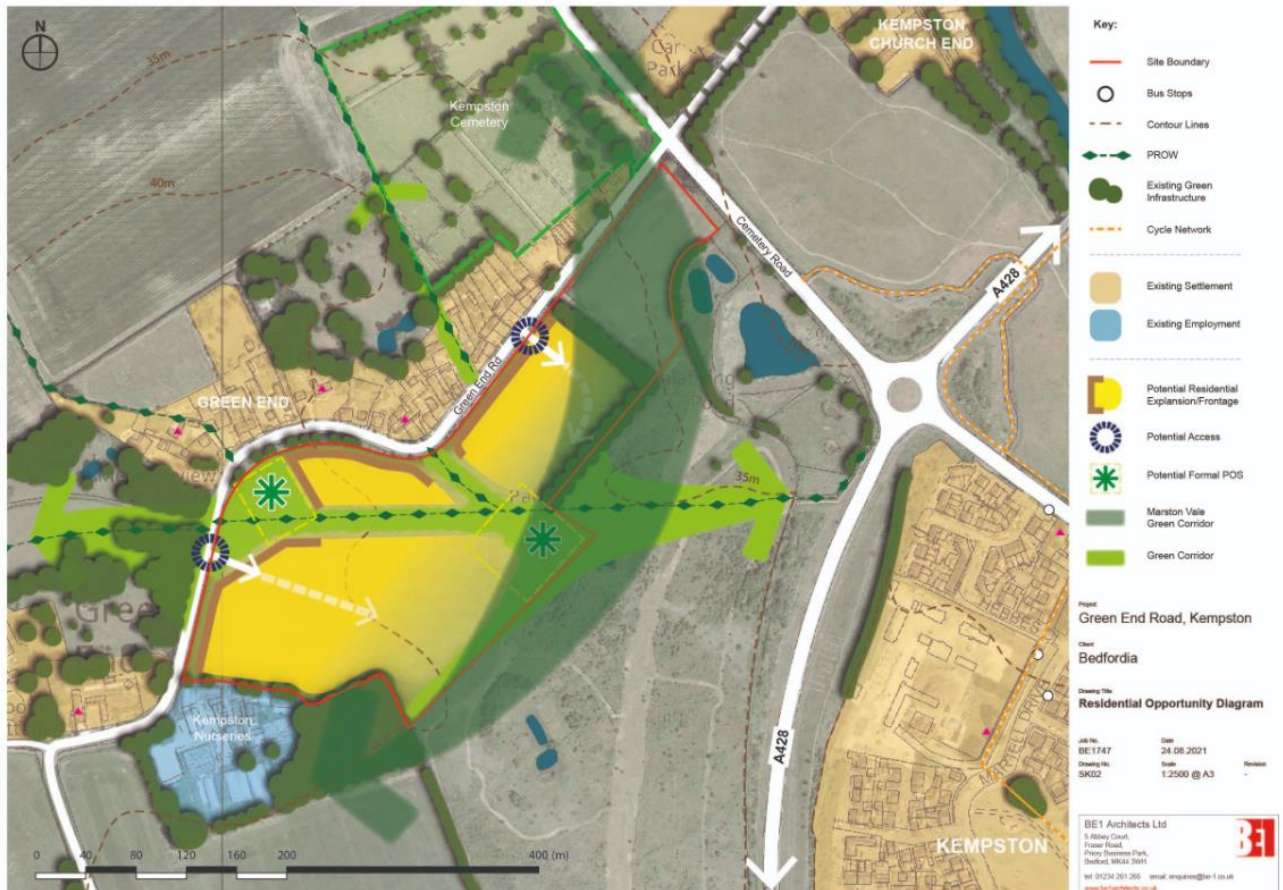


- 3.2 The site, extending to circa 7 ha, comprises an area of grass land and lies on the western side of Kempston. To the north the site is bounded by Cemetery Road, to the east by the A428 Branston Way and the Kempston urban extension, to the south by Kempston nurseries and residential development on Ibbett Close, and to the west by Green End Road and housing within Green End.
- 3.3 Access can be achieved via Cemetery Road or Green End Road.
- 3.4 The site is well related to the urban area of Kempston, and the extensive range of services

and facilities provided there and within the urban extension development area. This includes a broad range of retail facilities including supermarkets, doctors/dentist surgeries, schooling (primary and secondary) and a range of leisure. There is also access to public transport providing services to Bedford and the surrounding towns and villages.

- 3.5 The site is sustainably located relative to the wider highway network and surrounding settlements but is detached and capable of substantial development for a range of uses without impacting upon neighbouring uses and without resulting in physical coalescence with the main urban area.
- 3.6 There are no known physical, environmental, ecological, or archaeological constraints that would prevent development from coming forward.
- 3.7 Although a substantial site, the land has the potential to accommodate a variety of scales and types of development subject to design. For the purposes of these representations further site analysis has been undertaken on behalf of our client by BE1 Architects with input from Transport Consultants SDD. A copy of this work is included at Appendix 2 and has been used to respond to comments in the Council's Site Assessment proforma.
- 3.8 The analysis undertaken takes account of current and historic land use designations affecting the site area, including its previous allocation as part of the Land West of Kempston expansion (Policy H7). However, our client's land is not included within the specific land use proposals associated with this expansion. The areas assessed for development sit beyond the Bedford to Milton Keynes Green Infrastructure Opportunity Zone (Policy AD24) and are 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.
- 3.9 The Site Analysis concludes on the ability to identify a developable area of approximately 3.5 hectares across those parts of the land with the greatest capacity to accommodate new development and with feasible access options.

Figure 2: Land at Green End, Kempston – Development Opportunity Diagram



3.10 The developable area identified is comparable to the requirements for the delivery of specialist accommodation for older people as part of a Retirement Village model focusing on the provision of Extra Care facilities. This option should be subject to further testing by the Council for the purposes of site selection.

3.11 The developable area within the wider site would also be compatible with providing for general needs housing where the level of development proposed would be proportionate to the size of the settlement and the site's setting and context.

Response to Borough Council's Site Assessment Pro-Forma (Site ID: 1247)

Site Assessment Criteria

- 3.12 We have reviewed the Council's assessment of the site and wish to make a number of comments below.

Within or adjoining the urban area or a defined settlement policy area boundary

- 3.13 The Council's assessment pro-forma records the location as adjacent to the Urban Area Boundary, which correctly reflects the sustainability of the location and its proximity to services and facilities. However, despite this physical and functional relationship with the urban area the developable parts of the site would remain separate from the main urban area as a result of the existing green infrastructure corridor west of Kempston. This enables the opportunity to deliver growth commensurate to the built settlement at Green End and in-keeping with its local character and settlement pattern and without impacting on the important gap between the site and the urban area (Policy AD42).
- 3.14 It should be noted that this site would maintain sustainable patterns of development in this regard. The Council has on multiple occasions previously accepted the A428 bypass does not comprise a fundamental barrier to the extension of development west of Bedford. The bypass has been breached by various developments, including new employment west of the A428 encroaching into the Green Infrastructure corridor. Our client's land would avoid any further harmful impacts in this regard while continuing to represent a sustainable location for growth accessible to the main urban area.

Impact on designated or non-designated heritage assets or their setting

- 3.15 The Council's site assessment proforma finds that the proposal has the potential to cause harm to heritage assets, which may range from low to high. There are no designated heritage assets within the site itself and the nearest assets are located north of Green End Road within the existing settlement (3no. Grade II Listed properties).
- 3.16 Development of our client's land may result in some impact upon one aspect of their setting resulting from their relationship with the surrounding rural area. There will be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons. In the case of our client's land further assessment will be undertaken to more fully

explore impacts on significance and to ensure that any impact would represent less than substantial harm in terms of Paragraph 202 of the NPPF, which is the expected outcome given the context described above.

Protected Species and Ecological Value

- 3.17 The Council's assessment notes that the site is not located within an area of importance for nature conservation but states that protected species have been recorded on the site. This could be addressed through an ecology survey and protected species surveys, if appropriate, and the recommendations and mitigation strategy could be incorporated into any development scheme.
- 3.18 Site Analysis undertaken by our client demonstrates that the proposed developable areas would be focused upon areas of existing paddock and grassland. This indicates that those areas of greatest habitat value are likely to be unaffected, including trees towards the site boundaries the may provide habitats for protected species such as bats and badgers. These areas of the site could be subject to appropriate measures for protection and enhancement of their biodiversity value as part of the wider scheme proposals.

Green Infrastructure Opportunity Network

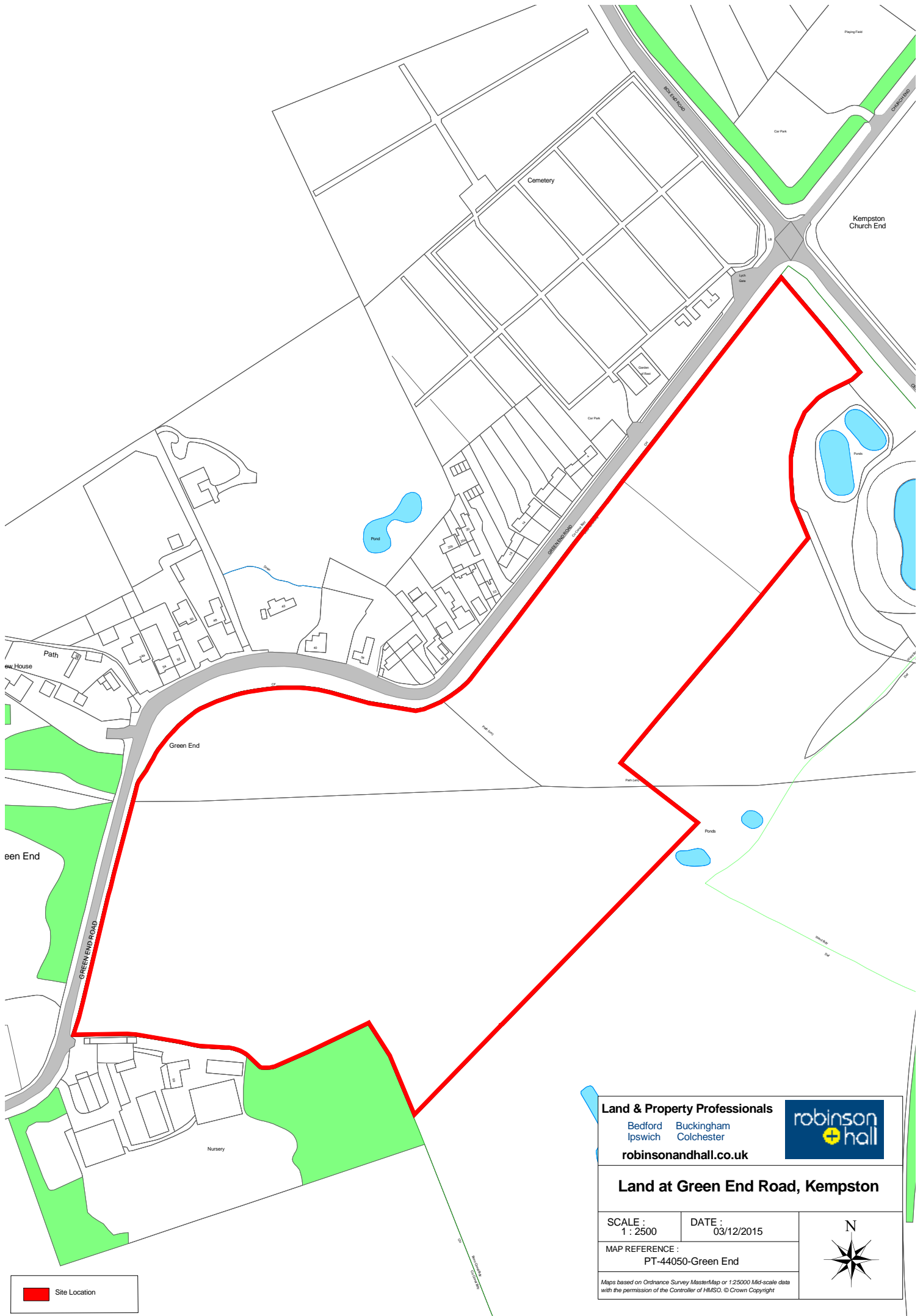
- 3.19 The Council's own site assessment proforma fails to recognise the location of the northernmost and eastern portions of the site within the Bedford Milton Keynes Opportunity Area. The Site Analysis undertaken on behalf of our client seeks to keep areas with this area free from the development while the wider scheme proposals on unconstrained land would offer opportunities for further enhancement and access for recreation and leisure.

Access, Highways and Sustainable Transport

- 3.20 The Council's assessment pro-forma notes no in-principle access constraints but would seek improvements in pedestrian and cycle connectivity from the site to surrounding services and facilities. This has been reflected in the Site Analysis and development opportunities identified on behalf of our client, including the excellent opportunities that the site provides in terms of connections to the existing Public Rights of Way network. In-particular:

- 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.
- If no vehicular access is proposed along Cemetery Road, it nevertheless feasible that a pedestrian / cyclist access is proposed in this location, to connect into the existing infrastructure.
- 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 enhance connectivity to further north to Box End

Appendix 1 Site Plan (Land at Green End, Kempston – LPA Ref: 1247)



Land & Property Professionals

Bedford Buckingham
Ipswich Colchester

robinsonandhall.co.uk



Land at Green End Road, Kempston

SCALE :
1 : 2500

DATE :
03/12/2015

MAP REFERENCE :
PT-44050-Green End



Maps based on Ordnance Survey MasterMap or 1:25000 Mid-scale data with the permission of the Controller of HMSO. © Crown Copyright

 Site Location

Appendix 2 Green End Road, Kempston – Site Analysis Document (BE1 Architects)

GREEN END ROAD, KEMPSTON

Site Analysis Document



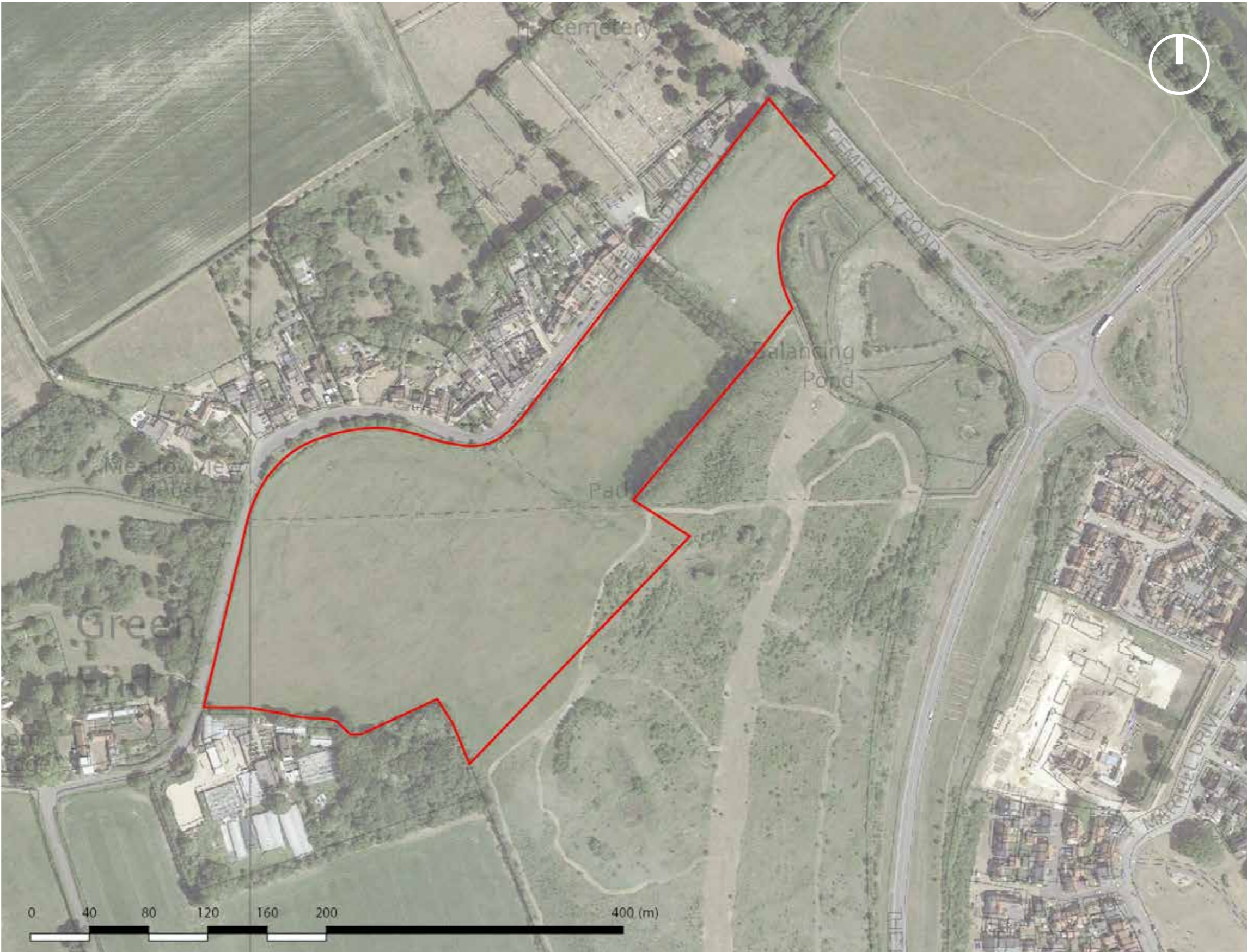
DRAFT

24th August 2021



Site Location

— Site Boundary

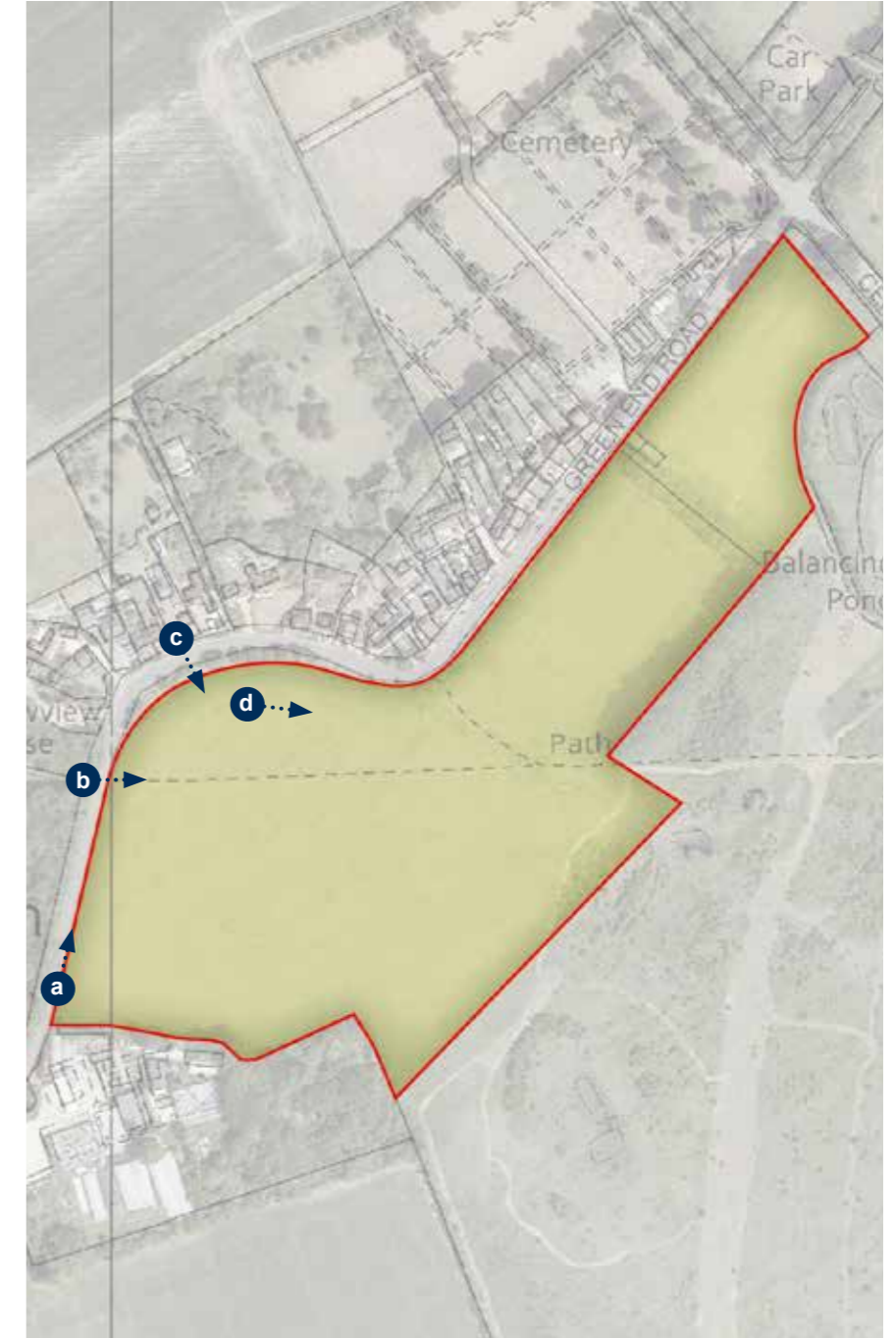


Site Location (3D)

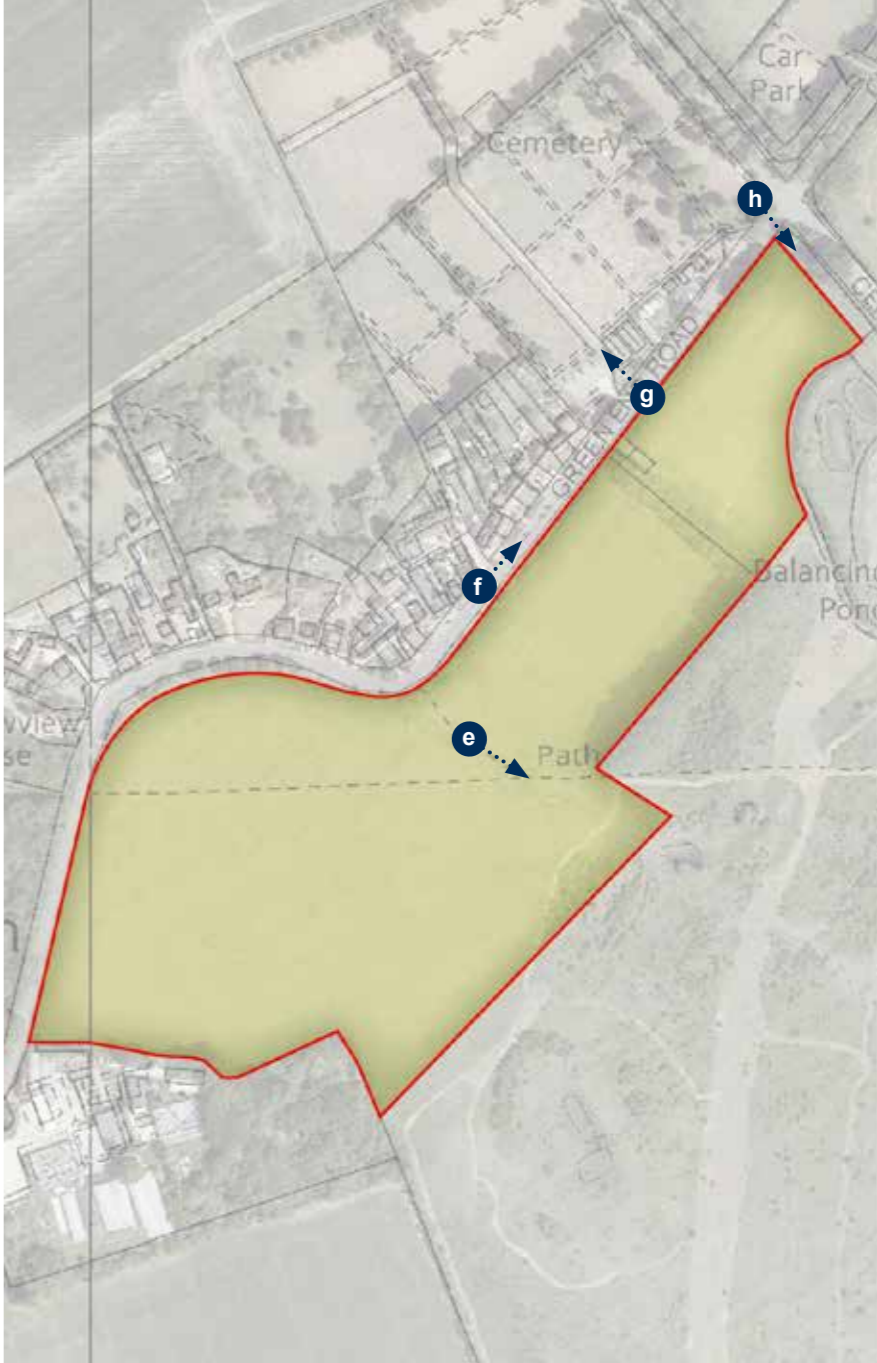
— Site Boundary



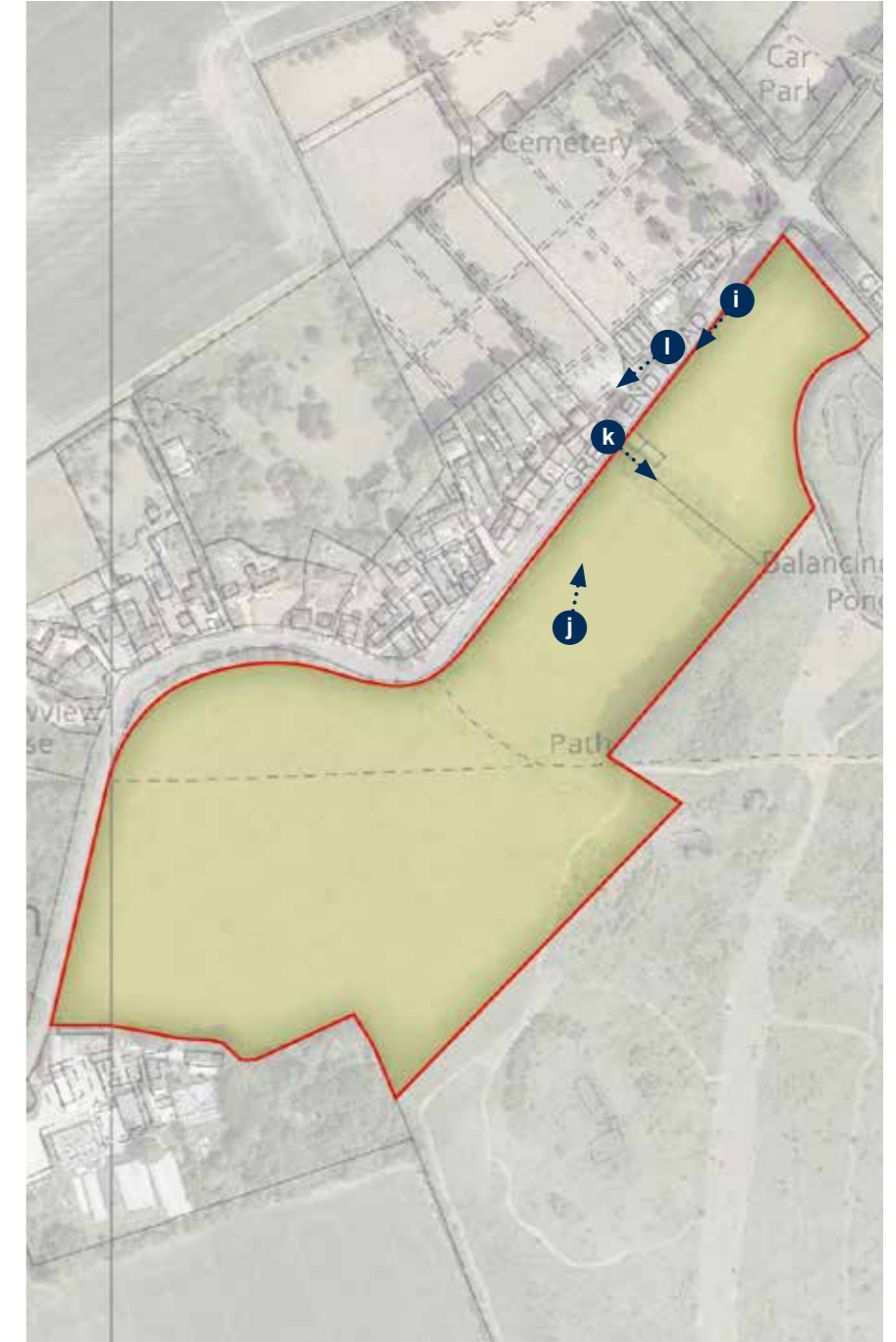
Site Photos



Site Photos

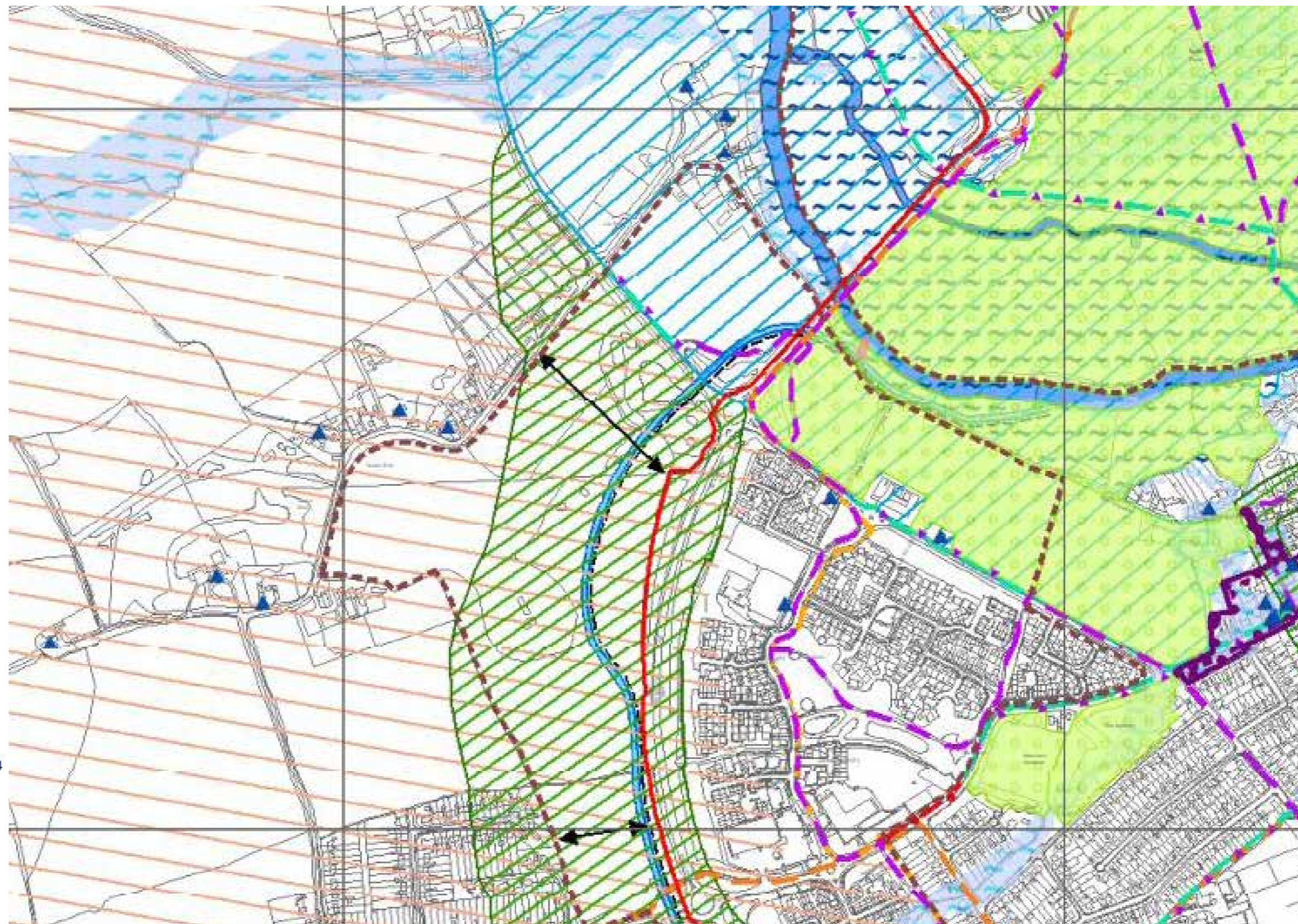


Site Photos



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



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 enhance 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
 - Bus Stops
 - ▲ Listed Buildings
 - - - Contour Lines
 - PROW
 - Ward Boundary
 - Local Gap
 - Existing Green Infrastructure
 - Cycle Network
 - Existing Settlement
 - Existing Employment
 - Marston Vale GIN Opportunity Zone
 - Council Ownership



- Key:**
- Site Boundary
 - Bus Stops
 - Contour Lines
 - PROW
 - Existing Green Infrastructure
 - Cycle Network
 - Existing Settlement
 - Existing Employment
 - Potential Residential Expansion/Frontage
 - Potential Access
 - Potential Formal POS
 - Marston Vale Green Corridor
 - Green Corridor





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