
Bedford Borough Local Plan 2040 Regulation 19 (Submission Document)

Representations on behalf of
Bedfordshire Hospitals NHS Foundation Trust

July 2022

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Regulation 19
(Submission Document)**

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1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore, now Stantec, on behalf of the Bedfordshire Hospitals NHS Foundation Trust (“the Trust”). These representations respond to the Bedford Borough Council (BBC) Local Plan 2040 Regulation 19 consultation, specifically the *Plan for Submission* (April 2022) and the Infrastructure Delivery Plan (IDP), which forms part of the evidence base.
- 1.2 The Trust is a key stakeholder within Bedford, providing essential healthcare provision to the population of the town and wider area from their established sites at South Wing (Kempston Road) and North Wing (Kimbolton Road). In addition to their role as healthcare provider, the Trust is a major landowner and employer within the Bedford area.
- 1.3 The Trust is part of a regional integrated care system – Bedfordshire, Luton & Milton Keynes (BLMK) Integrated Care System (ICS). BLMK ICS is made up of commissioning groups, local authorities, Acute Trusts, Community Trusts, Mental Health Care Providers and Ambulance Trusts who all have a health footprint across BLMK. A number of regional priorities have been agreed and continue to be delivered. They include illness prevention and health promotion and the provision of high-quality primary, community, social and secondary care. A number of the priorities link to capital development, including proposed construction projects at Bedford Hospital.
- 1.4 The Trust is keen to continue to engage with the Council regarding the emerging Local Plan and other relevant Planning documents, including the emerging Development Brief for the Land South of the River (Policy 14) Area.
- 1.5 This Report is submitted in response to the formal public consultation and relates specifically to the *Local Plan 2040: Plan for Submission* consultation document (April 2022). Section 2 of this report provides comments on the Vision and Growth Strategy and Section 3 provides comment on relevant Allocation Sites and Development Management Policy. Section 4 sets out some key background information relating to the Bedford Hospital and Section 5 provides comment on aspects of the supporting Infrastructure Delivery Plan (IDP) document. Section 6 gives a summary of our Representations, and the conclusions.

2.0 VISION AND GROWTH STRATEGY

- 2.1 The Draft Plan's 'Vision' is set out at paragraph 2.1, which states that its purpose is to demonstrate the focus and direction of the Local Plan.
- 2.2 The second paragraph of the Vision states that by the end of the plan period **"well-planned growth supported by appropriate infrastructure... will enable the creation of strong, safe and resilient communities in environments that facilitate healthy and independent living for all."** However, there is no specific reference to healthcare infrastructure, and we are of the view that this is an important element that should be included within the Vision (as mentioned in our previous Representations).
- 2.3 The fifth paragraph of the Vision briefly makes reference to the transformation of **"brownfield sites on the western side of the town and south of the river"**, the latter of which we assume relates to the Policy 14 Area which includes some of Bedford Hospital South Wing site and wider car parking land to the northeast of Britannia Road. Again, we are of the view that explicit reference to the Bedford Hospital sites should be made within the Vision, as these are key locations for development and improvement during the local plan period to 2040.
- 2.4 The Plan sets out four 'Themes' that are intended to reflect the Vision, including: Greener; More Accessible; More Prosperous; and Better Places.
- 2.5 We note that one of the objectives under Theme 3 (More Prosperous) has been amended since the Draft Plan, to include reference to health:

"Deliver the necessary health and social infrastructure to increase well-being in both the urban and rural areas of the borough."

- 2.6 We support this amended objective and recognition of the importance of health infrastructure to support wellbeing and development.
- 2.7 Theme 4's objectives include the following, which remains unchanged from the Draft Plan, and which we continue to support:

“Achieve a borough where everybody has appropriate access to high quality health and social care, as well as everyday essential services and community facilities where social and cultural wellbeing are supported, enabling all residents to lead healthy and independent lives.”

2.8 In terms of the Plan’s strategic policies, **Policy DS1(S) Resources and Climate Change** states that development must support a move to carbon neutrality. It then sets out a detailed series of points under the following headings:

- (A) Minimising carbon emissions;
- (B) Maximising carbon storage and sequestration;
- (C) Mitigating and adapting to the impacts of climate change;
- (D) Responding to the economic and policy changes that are likely to accompany climate change;
- (E) **“New development will be required to demonstrate through Sustainability and Energy Statements how it will take account of embedded carbon and contribute to mitigating and adapting to climate change and to meeting targets to reduce carbon dioxide emissions having regard to the above”.**

2.9 The Trust corporate objectives support the national agenda and objective of achieving net zero carbon and is underpinned by an Estate Strategy and Net Zero Carbon plan, both of which inform the Trust’s Site Master Plan. The Trust’s Estate Strategy includes significant infrastructure development to deliver this approach on their estate, and this will likely include new sub-stations, an energy centre, new efficient buildings and green space. We therefore support the Council’s aspirations and strategic approach towards addressing climate change and minimising environmental impacts. However, we are concerned that setting out a broad and extensive policy – as in Policy DS1(S) – could result in an overly onerous policy context. For example, point (E) refers to Sustainability and Energy Statements as a requirement for new development. However, this is not qualified in terms of which developments would be expected to provide such statements. This requirement would be excessive for many minor developments and could create a barrier to appropriate and sustainable development.

2.10 Most environmental and performance standards associated with new development are managed through Building Regulations, and it is important that planning policies do not seek to replicate these. There is the risk that policies will quickly become outdated and

inconsistent when Building Regulations are revised and updated. This causes confusion and, as mentioned, can create a context which negatively impacts on new development coming forward.

- 2.11 We suggest that Policy DS1(S) is clearly identified as a strategic policy – setting out the Council’s aspiration and objective regarding resources and climate change. We consider that Subsection (E) should be either deleted or reworded to ensure that it is realistic and achievable.

3.0 ALLOCATION SITES AND DEVELOPMENT MANAGEMENT POLICIES

- 3.1 We do not have any comments on the new allocation sites that are proposed within the Submission Draft Local Plan.

South of the River / Bedford St Johns Station

- 3.2 Paragraphs 4.51-4.54 refer to the South of the River Area, as allocated for development in the adopted Local Plan 2030 under Policy 14. Whilst much of the text is focused upon the plan to deliver circa 1,000 dwellings in this Area, we note the following statement under paragraph 4.54:

“The land at Britannia Road provides potential for Bedford Hospital to expand to accommodate planned growth, including a new multi-storey car park and attractive links to Bedford St Johns station.”

- 3.3 We support this reference to the Bedford Hospital, the Trust’s planned growth and the acknowledgement of the Hospital’s role within the Policy 14 Area. Regarding the reference to **“attractive links to St Johns station”**, we would highlight that the Trust has not committed to any land disposal or agreed to any projects in this regard. The Hospital’s landholdings are tightly constrained in this area and a masterplanning process will be required. We propose that the reference is amended to **“potential links to St Johns station.”**

Development Management Policies

- 3.4 We do not have any comments on the proposed Development Management policies, which are largely focused upon housing development.

4.0 BEDFORD HOSPITAL

- 4.1 As referred to in the Introduction, the Trust is a key stakeholder within Bedford, providing essential healthcare provision to the population of the town and wider area from their established sites at South Wing (Kempston Road) and North Wing (Kimbolton Road).

South Wing Site

- 4.2 The Bedford Hospital South Wing Site provides a range of essential healthcare services to the population of Bedford and beyond, including an Emergency Department, operating theatres, pathology, x-ray, inpatient wards and outpatient services. It is located circa 1km southwest of Bedford town centre, to the south of the River Great Ouse and southwest of the Bedford St John's Railway Station. The Hospital's main buildings lie to the southeast of Kempston Road, southwest of Britannia Road and the northwest of the A6 Ampthill Road. These buildings provide clinical, clinical support and essential non-clinical support functions. To the northeast of Britannia Road, the wider Hospital site includes essential non-clinical support buildings and car parking areas.
- 4.3 The Trust's current clinical strategy requires the strategic estate development of the Bedford South Wing site over the next 15 years. This has been agreed by the Executive and includes significant infrastructure development to support the corporate and national agenda and objectives to achieving net zero carbon; additional operating theatres; additional outpatient capacity; and inpatient provision for elective day care. The clinical strategy will inform the creation of a new 'development control plan' for the South Wing Site. Once this has been prepared, the Trust will be keen to share this with the Council and other stakeholders and partners.
- 4.4 The strategy for the wider South Wing Site will need to take account of a range of factors, including the proposed changes to the railway line and Bedford St Johns Station as a result of East West Rail. The proposed realignment will result in improved accessibility via public transport. However, there will be impacts on car parking provision at the Hospital, as around 1,000 car parking spaces are currently leased on the former Danfoss site. The car parking and access strategy for the Site will need to be progressed alongside the development control plan, and ultimately a new multi-storey car park will be required on Trust-owned land between Britannia Road and the railway. This has been discussed in principle with Council Officers in respect of the emerging Development Brief for the Land South of the River (Policy 14) Area, and the Trust is keen to work with the Council and other partners in developing plans for this area of change.

North Wing

- 4.5 The Bedford Hospital North Wing Site is a health village for Bedford. Located circa 1km northeast of the town centre, adjacent to Kimbolton Road, it includes Gilbert Hitchcock House, Florence Ball House, Enhanced Services Centre, Shires House, Dental Care Centre, Archer Unit, Cedars House and Fountains Court. Land is under a variety of ownership and clinical service management is aligned to several organisations. In partnership with other commissioners, the Trust are co-leading a strategic estate programme to enhance the delivery of primary and some secondary care from the North Wing Site. The Trust is keen to work with the Council and other partners to deliver a strategic estate programme for enhanced healthcare provision from the North Wing Site.

Planning Approach

- 4.6 In previous representations to the Bedford Local Plan 2040, we had suggested that a 'Special Policy Area' (SPA) designation for the South and North Wing sites would be an appropriate policy response. This would include identifying the sites for major redevelopment and change during the forthcoming plan period, and setting out a policy (or policies) related to the proposed development.
- 4.7 We understand from further discussions with Planning Policy Officers that specific designations and policies to cover the Hospital Sites are not considered to be necessary, given the location of the sites within urban areas and the general presumption that development would be acceptable subject to the usual development management tests. Instead, Officers have suggested that a Masterplan approach or Pre-Application process would be more appropriate.
- 4.8 The Trust is keen to work closely with the Council as their clinical strategy develops into a programme for the redevelopment of their estates, and we will continue to engage with Officers regarding the Development Brief for Land South of the River (Policy 14).

5.0 INFRASTRUCTURE DELIVERY PLAN

5.1 Paragraph 4.21 of the Submission Local Plan states:

“An Infrastructure Delivery Plan (IDP) has been prepared to support the Local Plan 2040. It identifies the infrastructure required to meet the level of growth anticipated in the borough in a sustainable manner. The document covers all types of infrastructure from transport and mobility hubs to waste water and supply, energy to schools, health to policies and fire services. The IDP identifies the infrastructure projects that will be required to meet the needs arising over the local plan period.”

5.2 The IDP has been prepared by AECOM and was published in May 2022 as part of the evidence base for the emerging Local Plan. The IDP identifies the infrastructure required to meet the level of growth anticipated in the Borough. This includes sections on both Primary and Acute Healthcare.

Primary Healthcare

5.3 Section 6.5 ‘Primary Healthcare’ makes reference to the BLMK CCG’s April 2021 publication, *Our Commissioning Strategy 2021-2024* and the separate *Our Primary Care Strategy*.

5.4 In looking forward at planned projects, the IDP sets out the emerging model for integrated health and care hubs. Paragraph 6.5.25 identifies five planned hubs, including:

“North Bedford Primary Care Hub, Health Village site, Kimbolton Road, Bedford (pre-2026, work in progress, £7.08 cost, NHS capital available in principle).”

(We assume £7.08 million)

5.5 Paragraph 6.5.38 provides cost information for three of the identified projects, including:

“North Bedford Primary Care Hub, Kimbolton Road, Bedford: £7.0m (assume funded – NHS capital available in principle).”

5.6 Paragraphs 6.5.39-40 provide an estimate of project costs, and also set out an alternative approach to estimating costs based on the ‘NHS Healthy Urban Development Unit Model’ which is based on 199 sqm per GP and £3,130 per sqm. The findings are set out in Table 6.14 (page 169), resulting in a cost of approximately £17m for 28 full-time equivalent GPs over the period to 2040.

Acute Healthcare: Hospitals

5.7 Section 6.6 ‘Acute Healthcare: Hospitals’ includes hospitals and specialist care services, including mental health care. Paragraph 6.6.3 explains that the Trust acts as the provider of acute healthcare in Bedford Borough and the BLMK CCH commission acute healthcare from the Trust, acting together as partners within an Integrated Care System (ICS).

5.8 Paragraphs 6.6.18-22 refer to the Trust’s Clinical Strategy and wider plans for estate development over the next 15 years.

5.9 Paragraph 6.6.29 refers to cost information for three identified projects:

- **“The estimated cost for the redevelopment of Shires House for inpatient mental health facilities is £60m.**
- **The estimated cost to deliver an additional operating theatre is approximately £6.8m.**
- **Electrical infrastructure upgrades will cost approximately £3.4m, although associated works represent Phase 1 of a larger infrastructure development programme.”**

5.10 Paragraph 6.6.34 provides information on funding and states that

- **“Funding for a new operating theatre is mostly yet to be secured, although £1m has been secured from an allocation received from the Department of Health and Social Care as part of COVID-19 recovery monies**

- **Funding for electrical infrastructure upgrades has been secured via the NHS.”**

5.11 In summary, this section of the IDP concludes (paragraphs 6.6.39-40):

“Bedfordshire Hospital Trust is formulating a Clinical Strategy and a Development Control Plan for Bedford Hospital involving a variety of capital projects. These include, at the South Wing Site, additional operating theatres, additional outpatient capacity, additional inpatient beds, and a progressed car parking and access strategy. At the North Wing site, planned investments include the development of a primary care hub, a joint scheme between the CCG and BHT...

“Costs associated with the full programme of works at Bedford Hospital are not yet available. However, acute healthcare equipment, technologies and infrastructure are high cost, and the overall programme of works of Bedford Hospital is likely to cost tens of thousands of pounds.”

5.12 We would like to clarify that the latter reference should be to **“hundreds of millions”** rather than tens of thousands. Significant investment is required.

5.13 The Trust has been happy to engage with AECOM in their work preparing the IDP 2022. The IDP helpfully references the Trust’s emerging strategies and associated projects. We would caveat that the IDP represents a ‘snap shot’ in time, and priorities and funding opportunities/constraints will change over time.

5.14 The Trust will seek to work closely with the Council and other partners, sharing their emerging plans for the South and North Wing sites to ensure the ongoing delivery of essential healthcare to support growth and development in Bedford and the wider area during the forthcoming plan period.

6.0 SUMMARY AND CONCLUSIONS

- 6.1 These Representations have been prepared on behalf of the Bedford Hospital NHS Foundation Trust in respect of their established land interests at South Wing (Kempston Road) and North Wing (Kimbolton Road) and their role as a key stakeholder within the Borough. In addition to providing healthcare services, the Trust is a major landowner and employer within the Bedford area.
- 6.2 These Representations are submitted in response to the formal public consultation and relates specifically to the *Local Plan 2040: Plan for Submission* consultation document (April 2022).
- 6.3 The provision of high-quality healthcare is essential to the growth of the Borough, highlighted particularly during the recent Coronavirus Pandemic. The development and improvement of healthcare infrastructure in Bedford is an important policy objective looking forward over the next 20 years. As set out within this Representation Report, we support the specific identification of health infrastructure under Theme 3 (More Prosperous) of the Council's Local Plan objectives.
- 6.4 The Trust's clinical strategy envisages significant development and improvement of the Hospital's sites during the Local Plan period to 2040. Whilst the Hospital Sites are not specifically identified or allocated in the Local Plan, the Trust will continue to work with in partnership with the Council to deliver the best possible outcomes for their landholdings. This includes working with the Council in the preparation of a Development Brief for the South of the River (Policy 14) Area and engaging in discussions regarding the emerging plans for East West Rail.

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