

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

**By Email**

Our Ref: 31308/A3/AW/SO  
14 August 2020

Dear Sir/Madam,

**SUPPORTING STATEMENT FOR ALLOCATION OF LAND NORTH OF CEMETERY ROAD,  
KEMPSTON, BEDFORD**

Please find enclosed a submission for the inclusion of land at Cemetery Road, Kempston for allocation for proposed community and residential uses.

The submission is comprised of the following:

- Call for Sites Form
- Site Location Plan
- Flood and Drainage Technical Note by Waterman, dated June 2020
- Preliminary Heritage Appraisal by Barton Willmore, dated June 2020

The Site is 5.49ha in size and comprises a flat, grassed area of land located north of Cemetery Road, Kempston. To the west is the A428 and to the east lies an area of sports pitches. The northern boundary extends as far as Church Walk public footpath and the southern extent of the site is formed by Cemetery Road. Two areas of land are excluded from the site, both accessed from Cemetery Road: a pumping station opposite the entrance to Martell Drive and Walnut Tree Cottage to the east. On the southern side of Cemetery Road is a relatively recent area of new housing known as 'Pilgrims Rest'.

The proposal includes development of a community centre and accompanying residential development to help cross fund the centre. Land opportunity within Kempston for community uses is limited and demand for such facilities is expected to grow with an increasing population. Existing facilities such as the Addison Centre are outdated and constrained in their location, unable to expand sufficiently to meet larger community group needs. The Grace Community Church for instance meet

regularly in this facility but are outgrowing its space with a projected increase in congregation due to reach circa 800 people in 10 years time.

Provision of new indoor community facilities to meet local needs is a topic that requires more focus in the Local Plan review and should not simply rely on development management policies (e.g. Policy 98) but a more proactive strategy for allocating new sites and sufficient land for indoor community provision, especially where existing community facilities are constrained and unable to meet the growing population's needs. Paragraph 20 of the National Planning Policy Framework states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for, inter alia, community facilities such as health, education and cultural infrastructure. Paragraph 92 goes further to require planning policies and decisions to plan positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments taking into account local strategies to improve health, social and cultural well-being for all sections of the community.

Indoor and outdoor community space provision go hand-in-hand, with multiple social, health and wellbeing benefits. The submitted Site at Cemetery Road, Kempston provides a suitable site for this complementary provision, along with supporting residential development, which should not be held back by artificial constraints, such as the historic Urban Open Space policy. This is not to say that the aims and objectives of such designations should be ignored, especially where there is scope to accommodate open space within the site, which can be enhanced, along with the retention of key views, enhancement of biodiversity and protection of designated heritage assets. We believe the submitted Site has scope to achieve these objectives and should be reconsidered in terms of its purpose and designation in order to provide wider public benefits.

To support your consideration of the Site we have prepared technical notes on Flood Risk and Heritage.

The supporting Flood and Drainage Technical Note shows that flood risk would not hamper development of the Site with the area of highest flood risk located north of the site. For the development of greenfield land the expectation is that all new development must be protected from the 1 in 100 year + 35% climate change 'design' flood event. This modelled scenario shows that the extent of Flood Zone 2 is reduced compared to the EA's flood maps and subject to the sequential test, mitigation through flood defences or raised finished floor levels (300mm above the maximum flood level) can be pursued. It may also be possible to redefine the shape of the floodplain (rather than reduce the area) through localised land raising to provide a better developable footprint, as long as levels are lowered elsewhere to ensure the current balance is maintained. It should be noted that there are two Anglian Water foul sewers crossing the Site that must not be built over and can be accommodated within the development layout.

The Heritage Appraisal, prepared by Barton Willmore, confirms that development of the Site can be accommodated whilst maintaining the significance of the two nearby listed buildings: The Lodge and Walnut Tree Cottage. The setting of the Lodge has changed considerably to the west and south of the asset. Development on the northern side of the road can be set back and of an appropriate scale to ensure that the Lodge retains what survives of its prominence within the streetscene. An offset can also be provided around Walnut Tree Cottage to mitigate the visual impacts of introducing built form on open space formerly connected with the asset. No development (or any ground works) would take place within the boundary or in close proximity of the scheduled monument to the north of the Site.

The above assessments show that the Site, despite its constraints, has potential to accommodate development and presents opportunity to be repurposed, to better meet local needs and produce wider policy objectives in terms of cultural, social and environmental gains. The Site is well placed to meet local community needs, including the need for new housing in a location that is close to existing services and facilities and well served by public transport to help reduce reliance on the car.

We therefore recommend the site for allocation for development of a community centre, residential development and enhanced open space through the Bedford Borough Local Plan review.

Yours faithfully,

The signature and name of the signatory are redacted with black boxes.