

**BEDFORD BOROUGH LOCAL  
PLAN – DRAFT PLAN STRATEGY  
OPTIONS RESPONSE  
ON BEHALF OF THE POLICE  
AND CRIME COMMISSIONER  
FOR BEDFORDSHIRE**

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## Introduction

- 1.1 This Issues and Options representation is made on behalf of the Police and Crime Commissioner for Bedfordshire ('The PCC') who have land interests in Kempston in Bedford Borough.
- 1.2 The site was put forward for consideration through the Call for Sites process in 2020 (site ID: 941).
- 1.3 The Strategy Options document that is being consulted on was prepared ahead of the publication of the revised National Planning Policy Framework 2021 (NPPF). A requirement was introduced within Paragraph 22 of the revised NPPF for Local Plans proposing new settlements or urban extensions to towns/villages to be set within a vision which looks at least 30 years ahead. Paragraph 22 will apply to the Bedford Borough Local Plan based on the transitional arrangements that have been put in place and as a result the Council will need to undertake additional work to establish a longer-term vision for the Local Plan 2040.
- 1.4 This representation sets out a number of comments and concerns in relation to the proposed strategy set out in the Draft Strategy and Options Document.

### Land west of Bedford Police HQ, Kempston

- 1.5 PCC are promoting land to the west of Bedford Police HQ for approximately 100 new dwellings (40dph) and associated works. This site has been given the ID 941 by Bedford Borough Council.
- 1.6 The site is 4.601 hectares and is located within the urban area of Kempston.
- 1.7 To the north, there is an open field and residential homes, to the east is Bedford Police Headquarters, to the west is a new residential development and to the south is Woburn Road and land associated with the development to the west.
- 1.8 The site comprises an open greenspace which is in private use and inaccessible to the public. Historically, this land was used for recreation by the police, however it has not been used for this purpose for some time. Over the years the parcel has been granted planning permission for use as a temporary car park for the Police HQ, but it has also been used sporadically for police dog training and trees on the western boundary have been planted in memorial to fallen police officers. A large area of the site previously benefitted from planning permission for a new police custody suite, however this permission was not implemented. Recently a second planning application was submitted and approved for a new police custody suite on the site, albeit this application encroached on a smaller area the site; the Council accepted that it was appropriate for built form to encroach onto the site as part of these applications.
- 1.9 The site has the potential to connect to an approved access onto Woburn Road, this was consented in May 2020 as part of a full planning application for a new police custody suite (application ref: 20/00278/MAF). The road which connects to this access is within the same ownership as the site being submitted.

- 1.10 The site is largely unconstrained, for example: there are no topographical constraints, there are no significant trees or vegetation, it is located within flood risk zone 1, it is not subject to a landscape or heritage designation and does not contain any public rights of way, and where constraints have been identified these can be appropriately addressed through mitigation.
- 1.11 It is noted that this site has an urban open space designation under Policy AD43 in the Allocations and Designations Local Plan 2013. However, as detailed in previous representations submitted by the PCC, and discussed further below, it is considered that this designation should be removed to facilitate development, particularly given the emphasis in the consultation document on delivery within the urban area.
- 1.12 This case is made on the basis that there are no pedestrian or road connections between this site and the nearby playing fields, the site is not of high ecological value, and due to recent residential development to the south-west of the site, it therefore cannot be argued to have any major wider green infrastructure network links. The evidence base also fails to provide justification for why a green break is needed in this location and we consider that there is no overriding purpose for this designation to remain in place.
- 1.13 Further, we consider the site is one of the most suitable put forward for development through the Call For Sites process due to its location within the urban area of Kempston.
- 1.14 There are a wide range of existing day-to-day services in walking distance of the site in Kempston and the surrounding area, including education provision (e.g. Kempston Challenger Academy, Ridgeway School and Balliol School) and Woburn Road Industrial Estate (a major employment area). Services and facilities in Bedford and those being provided as part of the recent growth to the south of Kempston are also in close proximity to the site.
- 1.15 Strong public transport options would also be available for future residents. The site is served by public transport routes 1, 68, A1, C1 and D which run along Woburn Road and provide regular services to Bedford Town Centre, Central Milton Keynes, Ampthill, Wootton and Stewartby. These can be accessed from Oak bus stops, located a 10-minute walk to the north on Woburn Road. The site is also located within the A421 corridor which provides access to the key economic centres of Cambridge in the east and Milton Keynes in the west. The nearest junction onto the A421 is located c450m from the south of the site.

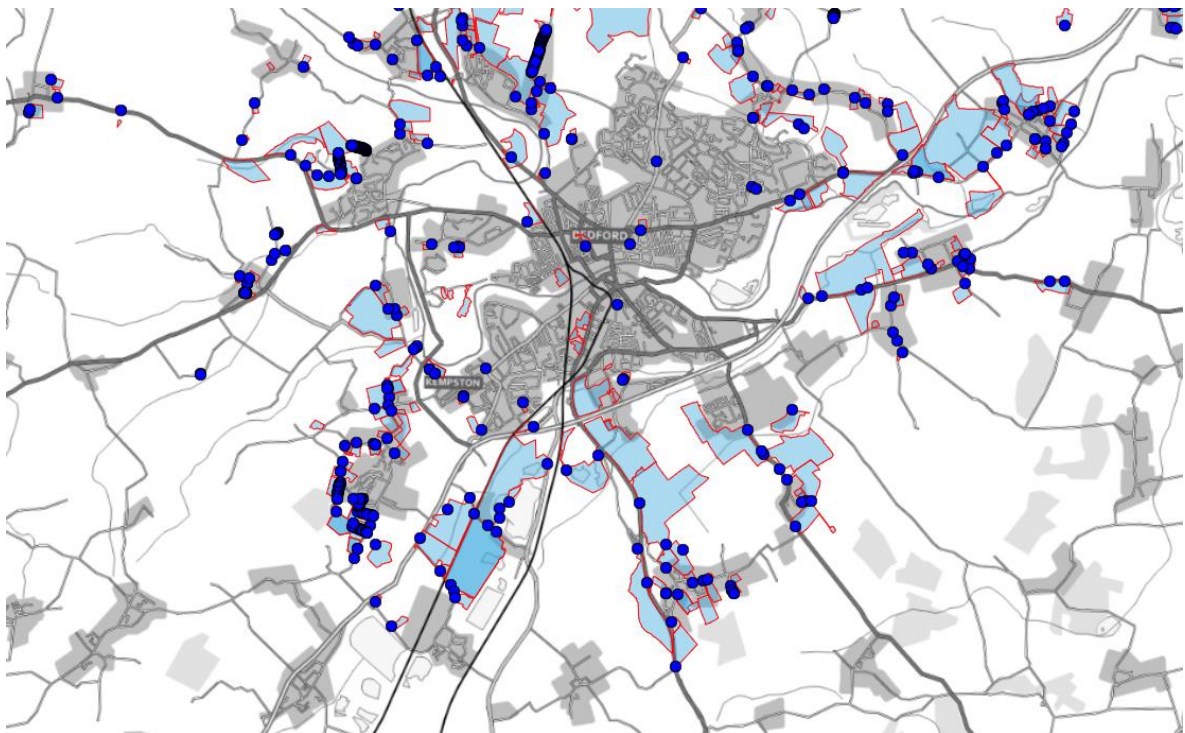
## 2.0 Level of Growth Required

- 2.1 Chapter 3 of the consultation document identifies that the minimum housing requirement figure for Bedford Borough, based on the standard method, is 1,275 dwellings per year (totalling 25,500 dwellings). Factoring in existing commitments, the Council have determined that the plan will need to allocate land to provide a minimum on 12,500 new dwellings.
- 2.2 It should be emphasised that the 25,500 housing requirement identified as part of the standard methodology is the *minimum* number of homes that need to be delivered over the plan period for the Bedford Local Plan 2040.
- 2.3 At this point in time the published documentation is unclear as to whether 'existing commitments' include emerging Neighbourhood Plan allocations that are intended to satisfy the requirements of adopted Local Plan policy 4S. If it is the Council's intention to count these allocations as commitments, the Local Plan should increase the minimum level of growth that is expected in order to allow for if the emerging Neighbourhood Plans fail at examination or do not pass referendum.
- 2.4 The Local Plan should proactively seek to plan for any potential slippage in the expected delivery of sites and for any unforeseen delays. At present, the only attempt to provide flexibility in relation to the housing requirement is stated at paragraph 1.50 of the published Draft Strategy Options Document. However, this comment is made in relation to the potential additional growth that could come forward through neighbourhood plans. It proposes that as the amount of new homes delivered through neighbourhood plans is an unknown, to ensure the delivery of the minimum number of homes planned for in the Local Plan, a figure in excess of 25,500 is required. The provisions to be put in place for under-delivery therefore do not go far enough at present.
- 2.5 It is common practice to make an additional allowance of 10% (in this case circa 2,550 homes) to the housing requirement in order to ensure that there is an appropriate contingency in place for under delivery. The PCC therefore consider that 28,050 homes (25,500 +10%) should be planned for as a *minimum*. This approach would also help to ensure that the requirements of paragraph 68 of the NPPF will be met which seek to ensure that councils plan for a deliverable 5-year supply of land plus an appropriate buffer.
- 2.6 As a centrally located local authority in the Oxford to Cambridge Arc, Bedford Borough should ensure that the level of growth that is planned in the authority is in line with wider aspirations for the area. Additional housing will be required to accommodate a growth in the working age population that results from the significant economic growth which is expected. Should this housing not come forward, it has the potential to have knock on impacts for existing residents in terms of increased house prices and worsening affordability. The planned economic growth in Bedford Borough makes it all the more pressing to deliver housing and puts significant pressure on the Council to plan for more homes than the standard housing requirement (plus buffer).
- 2.7 Therefore, the housing requirement in the Local Plan 2040 needs to plan for flexibility and the broader long-term economic aspirations for growth in the area.

## 3.0 Growth and Spatial Strategy Options

- 3.1 PCC supports the approach advocated in the Draft Strategy Options document which directs future growth being towards the main urban area of Bedford in which their site lies.
- 3.2 It is noted that The Development Strategy Topic Paper states that at the Issues and Options stage, the most popular options for commenters were the urban area, the A421 corridor and rail-based locations.
- 3.3 Further, the Sustainability Appraisal process identified that urban growth and urban edge growth are the most sustainable approach to new development.
- 3.4 PCC agrees that growth in and around the urban area is the most sustainable option. It is noted that as Bedford, and locations such as Kempston which form part of the urban area, are already heavily built-up with limited undeveloped land, it will be difficult to find available sites for the 1,500 homes identified over the plan period. Indeed, this is reflected in the Call for Sites map (Figure 1) which shows the sites which have been put forward, a limited number of which are in the urban area.

**Figure 1: Call for Sites Map Extract**



- 3.5 Of those sites that have been forward, it cannot be assumed that all the sites will be suitable and there may be constraints which limit delivery numbers such as neighbouring uses, access, ecological considerations etc...

- 3.6 This, therefore, makes it all the more essential that the Council give proper consideration to the sites that have been put forward for development and reconsider whether any existing policy designations restricting development are appropriate. For example, the PCC's site is located within the urban area of Kempston; this site has an urban open space designation which has little basis in evidence. This designation should be reviewed as part of the site assessment process to see if it remains necessary and, given the level of need, every opportunity should be taken to bring forward sites within the urban area where sites are unconstrained.
- 3.7 In a similar vein to the above, finding suitable sites for 1,500 home on the edge of Bedford will be a challenge. Development on the edge of Bedford is realistically limited to the north/north east of the town due to landscape, topography, flood plain constraints as well as the close proximity of the boundary of Bedford town to smaller settlements. This puts the emphasis on finding and allocating suitable sites within the urban area to avoid unnecessary greenfield development elsewhere.
- 3.8 Additionally, the PCC supports the intention to focus growth around the A421 corridor within three of the four options (Options 2a, 2b and 2d) presented in the paper. The proposed level of growth in the A421 corridor varies from 1,500 dwellings in option 2b and 2d to 2,000 dwellings in option 2a.
- 3.9 The PCC, however, would note a concern that there has been an arbitrary decision to limit the extent of the A421 corridor to a number of southern villages in the consultation document. The PCC consider that a more flexible approach to the corridor is necessary, looking at the areas and settlements in the area as a whole, and also considering the overlap with the urban area, with a current failure to recognise the important role of areas such as Kempston, which whilst within the urban area, is in very close proximity to the A421. It is considered that in finalising the strategy, this relationship should be given greater recognition, which would put the PCC site in a strong position for allocation.
- 3.10 On a similar basis, the Growth Options document does not justify the extent of the catchment area for the rail-based growth options. Indeed, both Bedford itself and other parts of the existing urban area such as Kempston are located in close proximity to the main rail station in Bedford Borough and this is not properly recognised within the document. The PCC would also question whether it will be possible to deliver the scale of growth proposed by the Council (50% of the housing requirement) in the area that has been identified; given there are a limited number of sites which have been put forward to the Council – with the majority of the large sites that have been put forward having been identified for potential employment use. Concerns around the ability of the Council to meet housing numbers at the scale suggested in rail-based locations make it essential that sites within the main urban area are thoroughly reviewed in order to maximise housing numbers.
- 3.11 The PCC also note that the final approach to growth identified within the Growth Options consultation document proposes one (Options 2a, 2b and 2d) or two (Option 2c) new settlements.
- 3.12 The PCC acknowledge that there is scope for the inclusion of one new settlement in the emerging Local Plan given the challenges in the area, however to include two new settlements at the expense of other options would be a high risk strategy when it comes to delivering much needed homes in the short to medium term; this is on the basis that large-scale sites typically have long lead in times resultant from land assembly, planning and infrastructure delivery, and

indeed the role that new settlements play in the long-term is further evidenced by the new NPPF paragraph 22 which requires for the strategy to be set within a 30 year, long-term vision where a new settlement is proposed. Again, short-medium term housing sites, particularly those within the existing urban area, should be a key focus for growth and will play an important role in complementing long-term opportunity that new settlements represent.



## 4.0 Site Assessments

- 4.1 The approach taken by the Council when making general conclusions and assessing the suitability of sites for development as part of the Site Assessment process has been unsatisfactory to date.
- 4.2 The site assessment forms have not been underpinned by a detailed review of the evidence available to the Council. For example, when looking at the PCC's site (ID 941), at 2b it states that in regards to protected species there is '*Uncertain or insufficient information.*' However, a recent planning application (ref: 20/00278/MAF) was approved for land adjacent to this land for a new police custody suite. As part of this application ecological evidence was submitted to the Council and the proposal was ultimately granted. Given the proximity of the application site to the land submitted as part of this Call for Sites process, it is considered that any significant/insurmountable protected species issues would have previously been flagged. Background information therefore does not appear to have been drawn upon to inform the site assessment forms published online.
- 4.3 The site assessment forms also fail to provide any detailed assessments or conclusions on key topics. For example, when looking at the PCC's site form:
- At 4a, the form states that '*the proposal has the potential to cause harm to heritage assets...*' and then goes on to speculate that this harm could be of any form of significance and that mitigation may or may not be required. It is apparent from the information presented that very little consideration has been given to the heritage impact that developing the site would have and as a result the Council could misrepresent a site which is acceptable from a heritage perspective or suitable mitigation could be implemented.
  - Similarly, the response from the Environmental Health team is a brief statement that '*only noise concerns would be police station itself*' without any real critical evaluation.
  - 15e, 15f and 'Highways comments' together note that there may be potential access and capacity issues which require mitigation, and then go on to suggest a potential means of mitigation. However, there is no real professional assessment as to the likelihood that this mitigation can be successfully achieved, and this therefore leaves a question mark in relation to the site deliverability.
- 4.4 Before any site selection process is undertaken, each site should be properly assessed and a firm conclusion reached on whether key areas such as highways, heritage, noise, etc. are an insurmountable issue or not.
- 4.5 The site assessment form does not allow for a consideration of the potential benefits that sites may offer. For example, the PCC's site is located within the urban area of Kempston and is therefore a highly sustainable site. No real consideration of this is given in the site assessment section of the forms.
- 4.6 The assessment process for sites should be thorough and draw information from an existing evidence base held by the Council. There should be a greater degree of transparency in the site assessment and selection process, and it is noted that plans in other local authorities have been brought down in recent years for failure to do this on the basis that it undermined the conclusions made.

## 5.0 Summary and Conclusions

- 5.1 This representation has detailed a number of comments and concerns that the PCC have with the Draft Strategy Options.
- 5.2 The PCC consider that the housing requirement for Bedford Borough should be adjusted to include a buffer in order to create flexibility and contingency in the supply which is not allowed for when purely the standard method requirement is utilised. The figure should also take into account the Government's wider economic growth aspirations for the Oxford to Cambridge Arc and the potential uplift in housing need that this will result in; it is important to note in relation to this that the standard methodology housing requirement is a **minimum** figure. Further, where Neighborhood Plans have not come forward or have failed at examination, and therefore no development sites have been allocated as is required under the adopted Local Plan, the Local plan should allocate sites to meet this need.
- 5.3 The PCC supports the decision to focus growth within the existing urban area as part of all four Options is supported. This approach to growth is highly sustainable and best utilises existing infrastructure.
- 5.4 The PCC would note that the assumed housing delivery possible in a number of the options identified may not be achievable i.e. rail orientated growth, edge of urban area, etc. It is therefore essential for the Council to thoroughly review all sites within the urban area for their development potential and review any existing policies, such as urban green space designations, in order to consider if the evidence underpinning these policies is sufficient to justify the designation and whether these sites would better contribute to meeting housing needs.
- 5.5 The site assessment process should thoroughly assess the suitability of sites reaching conclusions on key areas of interest and should draw upon all available evidence to substantiate information.