

LOCAL PLAN FOR BEDFORD BOROUGH FINAL CONSULTATION

BACKGROUND SPECIFIC RELATING TO RENHOLD

Renhold is a unique parish which is well documented in the following pages. What is more unusual is that over the collation of the Local Plan strategy framework for Bedford Borough, Renhold has seen both its inclusive and exclusion in the document. The need to highlight this to the Inspector is fundamental in order for Renhold Parish Council to truly convey why it is paramount that it remains that Renhold has no housing growth allocation at the area known locally as Salph End or within its parish boundary.

Therefore the Parish Council have set their response out deliberately in a way that expresses the key items relevant throughout the development and formation of the Local Plan so it is fully understood why Salph End and Renhold must remain as a completely rural settlement.

In response to the document published in September 2018, the Parish Council fully support its underlying strategy principles as it is inline with national planning policy and it focuses development on current infrastructure which has to be in place in order to support sustainable development. Therefore the move to grow more development in the centre of Bedford, is practical and will support the regeneration of the centre of town which is a positive approach.

The Parish Council also feel that the removal of a very large development site, standalone new community or garden village, is again a positive step. Developing a new community from scratch, through from inception, to design and delivery is an enormous undertaking, which whilst the local authority have some experience of this with Wixams, it needs such a careful balance, and the present growth of the local area with insufficient infrastructure out of town means the creation of a new community would not be fully thought out. It would be a quick attempt at a solution that will be littered with numerous negative consequences for generations to come.

The highways traffic movements in the local area around Renhold has seen massive changes, all for the negative, over many years since the building of the Bedford bypass. This issues has never been fully resolved and placing significant housing growth onto a network that is already at capacity and has no ability to grow would just bring further problems to the already congested and highly dangerous village roads as motorists speed horrifically in their bid to try and commute through the twisting lanes.

As detailed already the Parish Council support the identified approach that along with development there must be clear infrastructure to accompany and support this and the needs of the new inhabitants. It is incredibly important that developers must be held to account with legally binding and enforceable planning conditions that ensure they deliver the services required in advance of the new residents moving in. This is an approach the local authority have commenced and the Parish Council feel this needs to be retained and further safeguards put in place to ensure there is development commitment to the site and the local area. Officers need to be robust with their approaches to developers contributions, finding out the needs of the local area that will support all generations from young toddlers through to the older population, all who have needs that require specific support.

In addition to this, the Parish Council do feel it is vital that the introduction of healthcare impact assessments are not just a passing fad, where a plan is created but it is not realistic or deliverable. As an ageing population it is vital that services for everyone accessing the healthcare they require is available,

particular for areas like Renhold which are rural and therefore residents face a greater challenge in terms of ability to access healthcare without being reliant on others given public transport is so diminished.

The Parish Council also feel it is important that if the Inspector is minded to re-consider Salph End or Renhold, following the potential of the developer representation arguing their sites inclusion in the final Local Plan, that it would be prudent for the Parish Council response to address this. As a result the Parish Council have clearly set out below the Parish Council comments to the Local Plan during its previous various stages of consultation so it clear that there is overwhelming evidence of why Salph End and Renhold is not suitable for development. Also the large volume of responses that support this, given there have been several hundred comments in relation to Salph End and/or Renhold, which the Parish Council feels further highlights the inappropriateness for development in the local area.

In conclusion, the Parish Council would like to reiterate their support to the Local Plan document in its final submission and again make it clear that any considerations the Inspector may have relating to the parish of Renhold, that they formally request to be present during the public inquiry to make sure the Parish Council can make a representation in response.

Below is a copy of the Parish Council's response to the March 2018 Local Plan consultation and previous submissions.

RENHOLD SPECIFIC

The Parish Council are supportive of the drafted final Local Plan following the removal of the previously proposed housing allocation in Salph End, Renhold. The Council would like to highlight that it has been pleasing to see that Officers listened to the previous consultation feedback, reviewed the submitted evidence as to why Salph End is not suitable, and took positive steps to remove the sites from the document. The Parish Council are supportive of the local authority approach to regenerate the town centre with housing growth where there is better infrastructure and development can be delivered in a sustainable way. The Council agree with this policy approach and that by having extremely minimal urban area boundary growth will eradicate the risk of coalescence and reduce the loss of the natural green break between town and rural.

The Parish Council also note that within the consultation document the previous Urban Area Boundary policy statement is to remain unchanged. The Council agree with this judgement as there have been no significance changes in factors or circumstances to mean the findings would be any different if another review was undertaken. Therefore, the Parish Council fully agree and find the Urban Area Boundary policy AD41 to be a true reflection of the local landscape in its current context.

The Parish Council are mindful that the approach from the local authority to have a new focused growth area, with a garden village, will naturally impact on the local road network. As is well documented, the north of Bedford has a well established rat run route at peak flow times, of which Renhold is part of. The levels of which were documented in the Parish Council's previous consultation response. The Parish Council have seen the damaging effects large volumes of commutator traffic has on a rural parish, which means the allocation of Colworth Garden Village brings about concern for the impact this will have on increased traffic flows through the village. Given Renhold's proximity to the bypass which is now also identified in the central government as being part of the Cambridge to Oxford Arc, it is going to receive an increase in traffic movements from motorists trying to cut through. Whilst the site developers of Colworth Garden Village will have done a lot of traffic study analysis along with independent consultants

commissioned by the Borough Council, the Parish Council feel that highway safety measures and traffic calming must be provided to all the parishes on the well defined rat run route from the A6 at Sharnbrook, through Thurleigh, Ravensden and then on to Renhold.

The Parish Council were pleased to see the Borough Council acknowledge that Renhold has received a significant amount of growth in recent years, as detailed on Page 16 of the document, relating to the Spires and Aspire building developments. This again further supports the principle that Renhold is not suitable for further growth as it has grown substantially in the last ten years.

The document sets out how the Borough Council will deal with local growth and planning applications in Group 3 and 4 areas. Renhold is, and has always been an anomaly in this respect given its linear nature with the older part of the village. There are two recognised and defined Settlement Policy Areas (SPA) in Green End and Salph End, however, the two 'ends' in the middle of these areas, Church End and Top End are identified as 'smaller settlements' in the document. Green End has no facilities, for example no public house, no school, no shops, indeed, no vacant land within the SPA boundary, in fact nothing other than a bus stop, yet is given an SPA classification. It would be more in keeping if Green End became a smaller settlement given its distinct similarities with Top End and Church End. It is for the same reason that the Parish Council object to the inclusion of Church End and Top End in paragraph 6.19 and hence in Policy 5. Their distinct character is as linear developments with no obvious gaps where development could be introduced that is in keeping with their character. The Parish Council also feel that Ravensden Road should be classed as a smaller settlement to enable it to be protected in line with the policy applied to the other parts of the parish.

On Pages 88-92 the document talks about the approach to biodiversity that will be taken, there are a number of local references to identified areas. The Parish Council feel that the Borough Council should include and make a reference to the Renhold Brook area as it has an abundance of wildlife.

The Parish Council note that 194 references that AD22 Land North of Ravensden Road, Salph End, Renhold is Saved, the Parish Council are supportive and in agreement that the allocation of almshouses accommodation for local people should remain within the document as a future provision.

The allocation of Local Green Spaces are talked about on Page 93, the Council will be reviewing the associated policy map and comment on the allocation.

GENERAL COMMENTS:

The consultation document references the need for developers to have a health consideration for developments over a set size, (Page 28) and a requirement for them to undertake a health impact assessment (HIA), similar to what is seen with an EIA Environment Impact Assessment. The Council fully support this approach, however, it is unclear what practical deliver-ability and outcomes will be achieved from having such a document in place. The developer and NHS England, or the relevant healthcare commissioning authority must be held liable and to account for the delivery of such important facilities.

The document references sustainable development and the need for this, as well as focused development and access to facilities on Page 30. The Parish Council in particular support the following policy wording as being robust and sound.

Policy 2S – Spatial strategy

To deliver sustainable development and growth that enhances the vitality of the borough's urban and rural communities, all new development will be required to contribute towards achieving the stated objectives and policies of this plan through:

- ix. Safeguarding the intrinsic character of the countryside through the careful management of development to meet local needs whilst supporting the rural economy.*
- x. Delivering the majority of rural growth through neighbourhood plans.*

On Page 31 there is reference of the Urban Area Boundary in 6.11, whilst this offers broad reference to this part of the borough, the Parish Council fully support the sentiment and that it must be respected and applied as planning policy of such land has a planning application put forward.

6.11 In order to distinguish between where policies relevant to the countryside and policies relevant to the urban area and other settlements apply, an urban area boundary and settlement policy areas are defined. The principles followed to determine these boundaries are set out in the Allocations & Designations Local Plan 2013, chapters 13 and 15.

6.12 The character of the rural parts of the borough is not uniform and is made up of different types of settlement, agricultural land, woodland and areas of water; it includes a variety of economic activity. It is home to about a third of the borough's population and maintaining the viability of rural settlements is an important aim of the local plan.

SUMMARY:

The Parish Council are supportive of the soundness of this document and agree that Renhold should not see an allocation of development. Being mindful that land owners make come forward at this stage to try and argue that Renhold should have development, the Parish Council feel it is prudent to set out below the comments previously submitted to explain to the Inspector why Salph End and Renhold is not suitable for development.

Overview

Renhold Parish Council strongly opposes the proposal in the consultation document for 500 houses and a primary school at Salph End, which would then become part of the urban extension. In its response to the questions arising from the consultation, it is prefaced by this absolute objection.

Renhold Parish Council disagrees with the Borough Council's inclusion of Salph End as an extension to the urban area. The Parish Council is supportive of the allocation of 20 houses as initially promised, enabling Renhold to remain as a Group 3 village with the clearly identified two separate Settlement Policy Areas (SPA), Salph End and Green End.

With the Borough's proposal for such significant development in Renhold, the Parish Council wishes to set out in its objection the wide range of supporting evidence as to why this is in breach of current planning principles.

Historic Background Information

In 2000, the Parish of Renhold comprised of a rural village separated from the urban area of Bedford by Norse Road and Wentworth Drive – essentially a northern loop road around Bedford - and open fields. The built-up area of the village comprised of 5 ends – Water End, Green End, Top End, Church End, and Salph End – separated by small tongues of farmland. The character of each of the ends was, and still is, essentially linear with properties fronting the lanes that connect the ends. Since then the village essentially is unchanged with the Ends connected by unclassified lanes. But, there have been some important changes:

- The construction of the Water End junction of the A421 and completion of the A421 between the A1 and the M1 created a destination that attracted vehicles of all classes to use Renhold's lanes as a short-cut

from the west of Bedford to the A421. This was recognised in the Public Inquiry where it was stated that the bypass would have a detrimental impact on Renhold. Over a number of years, the Parish Council worked with Bedfordshire County Council and Bedford Borough Council Officers to reduce the volume and speed of traffic through the village. Firstly, traffic lights were installed near the Church at a particular pinch point, then a Traffic Restriction Order was implemented that bans through traffic between Wilden Road and the A421 junction in the morning and afternoon peak periods. This also coincides with the main parent activity at the village school on Church End. The TRO is not enforced and the traffic volume data collected before and after the installation of the TRO supported that this has had little effect, if any, on traffic volumes. Thirdly, in 2016, average speed cameras were installed, again between Wilden Road and the A421 junction, but in two separate installations, and, at last, vehicle speeds have reduced significantly. Between these measures they have restored an element of peace to the village. However, one consequence is that traffic now uses Hookhams Lane as a short cut instead.

The above issues clearly identify that the Ravensden Road route is an established 'rat run' which traffic comes into the village through. Previously traffic continued travelling through the village onto the bypass junction through Church End. Since the installation of the average speed cameras this has displaced the traffic and it now travels along Hookhams Lane. **As a result, the increase in volumes and speeds of traffic along Hookhams Lane is very noticeable at peak flows. Having a large housing development which relies on direct highways access onto two unclassified roads is not acceptable. The houses off Norse Road within the parish are serviced by direct access onto urban roads which are part of the main Borough highway route. There are no large developments in Bedford which access directly onto two separate unclassified roads.**

- The popularity of Renhold V.C. Lower School attracts pupils from a wide area. It is located in Church End which is the route from the west of Renhold and from Wilden to the A421 junction. Many travel to the school by car and on regular occasions more than 70 cars are parked on Church End waiting for the end of the school day. This reduces virtually the entire length of Church End, a lane with two blind bends, to a single carriageway road with passing places formed by the H bars at domestic gateways. The resulting congestion is a regular and frustrating nightmare for parents and residents. The situation has resulted in a bus provider withdrawing from running a service through Renhold due to the inability to keep to the published timetables. The school is to be extended by two additional forms in the current reorganisation to create a primary school which will result in further pressure for parking. The School's own travel plan estimates a further 40 children potentially arriving by car.

The associated traffic from 500 houses will have a significant detrimental impact on the road network within the Ends part of the parish, which as previously detailed is linear and all unclassified lanes. The Parish Council has well documented evidence of the constant issues with access through Church End. An additional 500 houses will have a further detrimental impact on this situation, a fact acknowledged and documented by the Borough Council Officers as being impossible to manage.

Current Planning Policy applicable to Renhold

The following statements set out supporting reasons why the proposals are against planning policy.

Renhold has always been recognised as being unique in all previous framework documents. This is even documented in the Borough Council's current planning framework document. The Allocation and Designation Plan clearly states in Section 15 that its purpose is '*preventing coalescence between the urban area and nearby villages*'. **The current proposal is a complete contradiction of this statement.**

Furthermore, the document references Policy AD44 that clearly sets out that '*In this respect local gaps will be protected, not only from development that would lead to a physical joining of settlements, including that which might normally be considered to be acceptable development in the countryside, but where possible also from an increase in levels of activity which would reduce the distinction between leaving one settlement and arriving in another. This policy takes account of the principle that the essential feature of the gaps can be purely the absence of development and activity rather than necessarily its landscape quality.*'

Section 15.11 even identifies Salph End and specifically states, '*Salph End immediately adjoins the urban area and extends northwards from it but separation needs to be maintained in relation to development on Norse Road (less than 600 m). Any development on the east side of Salph End is likely to reduce openness and contribute to visual coalescence with Bedford thus affecting the separate character and identity of Salph End*'. **The above clearly demonstrates that development would affect the character and identity of Salph End. It would also bring about the coalescence of Salph End with areas which current planning policy sets out should not happen.**

This is further reinforced by the reference then that recognises that Renhold is unique and should therefore be protected as it states, 'Renhold (Green End) the gap between Green End and Bedford varies between 600m and 1km. Green End is located on higher ground overlooking Bedford and any development in this area is likely to reduce openness and contribute to visual coalescence thus affecting the separate character and identity of Green End'. As well as 'Renhold (Church End) the gap between Church End and Bedford is less than 900 m. Church End is located on higher ground overlooking Bedford and any development in this area is likely to reduce openness and contribute to visual coalescence thus affecting the separate character and identity of Church End.

This is clear evidence that the two identified SPAs in Renhold are classified as an important local gap from the urban boundary. There has been no consultation or evidence of this changing.

During the preparation of the Local Plan, Renhold has been identified as a Group 3 village. In a previous consultation, it was proposed that Group 3 settlements should provide for between 10 and 20 dwellings in settlement policy areas [SPA]. Renhold has two SPAs at Green End and Salph End, meaning that the village of Renhold would have had to accommodate, in total, between 20 and 40 dwellings. The Parish Council response was that it would be difficult to identify land for these numbers of dwellings within the SPA boundaries.

The current consultation document, in a total departure from this, proposes that Salph End should accommodate an urban extension of 500 dwellings plus a one-form entry primary school. **Unlike the previous estates off Norse Road, this proposal takes access from within Salph End utilising the existing rural roads, and so does not face the urban area of Bedford and cannot be considered to be an urban extension of it.**

When the Parish Council sought guidance and clarity from Planning Policy Officers in May 2017 regarding the associated supplementary document relating to the Urban Area Boundary Review and the Local Plan 2035, the following response was received.

'Given that this review took place relatively recently we are not proposing to review the whole of the urban area boundary as part of Local Plan 2035. However in terms of defining where the precise boundary will be drawn as a result of new allocations, Policy AD41 Urban Area Boundary will remain a policy in the development plan and paragraph 15.4 of the A&D Plan sets out the principles for how the urban area boundary should be defined.'

The document referenced clearly states from Section 2.8 to 2.11 how Salph End should be dealt with in terms of the Urban Area Boundary.

*Salph End Physical attachment – 2.8 The development in Salph End is separated from the main built-up area by amenity open space which at its closest is a distance of about 130 m. Salph End is connected to the main built-up area by Hookhams Lane which has footways on either side. There are also a number of public footpaths across the fields from Salph End. Visual attachment – 2.9 The main built-up area in the vicinity comprises uniform estates of detached houses on small plots dating from the 1970's and 1980's. Salph End can be considered in two distinct parts. The southern part comprises a variety of houses and bungalows fronting Hookhams Lane. At the southern end of this part, the development is largely made up of newer individual style bungalows, while the remainder is of older, uniform, estate-style bungalows and houses. In the northern part of Salph End are the estate-style developments of Home Close and Brickfield Road on either side of Hookhams Lane which, although different from each other in age and design, are visually similar in that they both entirely comprise uniform style suburban bungalows on small plots. Nevertheless, they are visually distinct from the uniform housing of the main built-up area. Social attachment – 2.10 There is a local shop and post office counter in the centre of Salph End at 42 Hookhams Lane which sells groceries and newspapers. The nearest public house is The Polhill Arms on Wilden Road about 260 m east of Hookhams Lane. There are no employment, education or health-care facilities in Salph End apart from in the facilities listed above. Conclusion – 2.11 Although the development around Salph End is physically close to the main built-up area, it is visually distinct from the main built-up area because of the different type, form and density of the development. The community at Salph End is capable of being socially independent of the main built-up area to a certain extent. **It is therefore considered not to form part of the main existing built-up area of Bedford and Kempston; and should not be included within the urban area.***

The above therefore illustrates that the inclusion of Salph End as a proposed urban area extension is fundamentally against the Borough Council's own and current planning policy document. Therefore it MUST be removed.

The Allocations and Designations Plan 2014 clearly marks as policy AD42 the identified Local Gap within the parish of Renhold between the north of the Norse Road developments and the area of Salph End. **The proposed development of the two sites west of Hookhams Lane will demolish the gap clearly put in place to prevent**

coalescence and keep an important area of open space between Renhold and the urban boundary. No other identified Local Gap as per policy AD42 has been identified for housing development, and there is no new evidence of what has changed to mean that identified is space is no longer worth preserving.

The Borough Council have suddenly changed the parish housing allocation for a number of villages very significantly from the last consultation to this stage, with very little transparency or consultation on the supporting reasons for this drastic change. **The driving factor in the supplementary documents for this consultation moving from the previous allocations to what appears to be a standard number of 500 is related to education capacity. Whilst the Parish Council understand this is an important factor, it has not been communicated at any stage since the last consultation or this stage, that education capacity is a real issue for the local authority. It is also not sufficient to use this development strategy to impose substantial numbers of new houses and new schools when there has been no assessment of local need.**

The Parish Council is concerned that due process has not been followed in a way that is clear for residents/electors to fully understand. Even the Parish Council as the first tier of local government have not been fully explained as to why Renhold has gone from a Group 3 village to an urban extension for example. **There has been no guidance or clarification from the local authority in a forthcoming way for this sudden change. The presumed reason for such a change has had to be assumed by working through very detailed and technical supporting documents totalling several hundreds of pages. There has been no clear communication in any methodology within this main consultation document as to why there has been such a change in direction. Section 2 of the document just sets out how things have moved on since the last consultation, there is no mention of the driving factor around how Group 1 villages and Renhold have gone up to 500.**

The Parish Council have at no stage been able to locate the supporting review and evidence carried out by the local authority in relation to re-defining or altering the urban area boundary. There has been no consultation on this, or any easy to find reference in the numerous supporting documents which set out the conclusions that have led to any of the proposed urban area extensions being suitable. There is no methodology for this process, the only clarity that the Parish Council has received was being notified at the meeting with Planning Policy Officers a generic distance of up to 0.5 miles of the urban area would be considered by the Borough Council. There has been no evidence of other areas for example, Clapham and Ravensden, having undergone a review or being considered for urban area extensions even though they are within this distance which has supposedly been used. There are no fundamental criteria that have been arrived at, which have then been applied to the process of determining the areas which are to be considered as an area to extend into for the urban area, with supporting reasons.

Character of Salph End

Salph End [including Ravensden Road] has a current total of just 231 dwellings, so a proposed urban extension of 500 dwellings plus a school will swamp it. The Parish Council feels that this will totally destroy its character and is in direct contradiction of all the caveats in the consultation document. This is an increase of 200% so is clearly over development.

Planning Reasons for the unsuitability of the sites

Please note the following comments are based on the proposal for multiple sites coming forward collectively to site the proposed 500 houses. **One of the main objections to the sites coming forward is that Salph End has had no significant assessment of suitability for such high levels of housing. In the consultation supporting documents it makes clear reference to detailed assessments and considerations taking place for identified Group 1 and Group 2 villages. However, at no stage has there been such work done for Salph End, largely due to the fact it is categorised as a Group 3 settlement. This is inadequate and failure of the local authority in due diligence and care.**

Urban Extensions

The recent urban extensions in Bedford have all followed similar patterns. In general they have been 'stand-alone' developments which are access from the main or strategic highway network. The 4 closest examples are the 'Spires', 'Aspire', Thor Drive/Cranbourne Gardens (these 3 are all in Renhold Parish) and the Brickhill/Ravensden development. This recent pattern of urban extensions have not seen the coalescence or expansion of an existing village setting. The proposed Salph End urban extension appears to be contra to the Council's previous position on urban extensions and Salph End must be considered a tenuous and incongruous extension of the urban edge of Bedford.

Highways and Transport

The National Planning Policy Framework (paragraphs 29-41) states that planning policies should 'actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable'.

The National Planning Policy Framework states that planning policies should aim to achieve places which promote accessible environments containing clear and legible pedestrian routes, and that developments should be designed to give priority to pedestrians and cyclists.

Access to all the proposed development sites are off unclassified village roads which have evolved on the ancient historical routes and were not designed or engineered to modern highway standards. These village roads are wholly unsuitable to sustain the large volumes of traffic that will result at the peak times.

If you consider the 3 nearest 'urban extensions' which are all in the Parish of Renhold ('The Spires', 'Aspire' and 'Thor Drive/Cranbourne Gardens'), which have considerably less than 500 houses, they all have roundabouts off Norse Road which are designed to modern DRMB highway standards. Any urban extension of 500 homes should see the highways highway standards applied. It is clear that such a design of roundabout cannot be accommodated in Hookhams Lane. The urban extension at Brickhill has a roundabout off Tyne Crescent is of a smaller scale, however, than is acceptable due to the length of the estate approach road. Again, it is clear that this roundabout design cannot be accommodated at Hookhams Lane without significant engineering. All of these 4 'urban extensions' are accesses from modern roads that have been able to accommodate the new access arrangements and the increase in volume of traffic. **It is clear the village road network of Renhold is not up to the appropriate standard (despite the incorrectly assessed conclusions of the Highway Assessments) and cannot accommodate the required new access points.**

The roads do not have footpaths on both sides, which means pedestrians have to regularly cross the road in order to reach their destination. One example is if you make a journey on foot from Hookhams Lane to Wentworth Drive, you have to cross Hookhams Lane twice. If you are to continue this route on to the nearest local parade of shop, you would have to cross two further times, across Wentworth Drive towards Church Lane. Wentworth Drive is a Borough Council identified strategic highway route which has very heavy traffic flow and no safe crossing pedestrian point. So of the four road crossings the pedestrian would have to make on their journey, three of them have no safe crossing route. This is clear evidence therefore of this not being a safe or sustainable route for pedestrian users, who are likely to be families with pushchairs and children on scooters/bicycles.

The above safety considerations further highlight the fact that any development would require significant upgrades to the highways structure of the village to provide the required sustainable links that would be expected from a sustainable urban extension.

The NPPF, highway design standards (DRMB) and local policy require high quality pedestrian and cycle links. Ravensden Road and Hookhams Lane will see traffic of such a volume that there will be a requirement for off road pedestrian and cycle routes. **There is simply not sufficient room with the narrowness of Ravensden Road and Hookhams Lane to accommodate a footpath or indeed a cycleway. Such changes would require significant engineering and impacts on residents, including the potential for the removal of front gardens. There will have to be consideration given to bus access into the new school and to village as a whole. The design considerations for buses at junctions does change the design dramatically and this is yet another factor that has not been taken into account.**

If the development sites have the appropriately designed access points which will have to include roundabouts with lighting, pedestrian and cycle access routes (min 3m wide) and further street lighting through the village - it is clear that the rural village nature of Salph End will be significantly detrimentally impacted and changed. **There are currently no street lights in any of the five Ends of Renhold. This is something the Parish Council and residents are unanimously supportive of as it retains the village feel.**

The site assessments done in relation to highways have been reviewed by Officers looking at the sites on their own individual merit only. This is not adequate and must not be the basis for the sites being allowed to be included at this stage as a collective group of sites. There is no evidence of the collective highways impact for sites 610 and 198, nor for 205 and 581. There has also been no assessment of the impact the group of four sites would have on the unclassified lanes given the current traffic volumes at Ravensden Road and Hookhams Lane. **It is not acceptable that assessments looking at cumulative impact and suitability have not been done at this stage. The Parish Council were assured by Officers that this had been done when we met with them. On sight of the highways assessments this contradicted what the Parish Council had been told as clearly there has**

been no cumulative analysis done. The Parish Council strongly object to the inclusion of these sites on the grounds of highways as set out above and when reviewing the traffic volume data provided by Bedfordshire Police.

In 2009, six days of data collection at Ravensden Road from 3rd June to 8th June showed total number of vehicle movements as 16,430.

In 2013, seven days of data collection at the same location showed 19,545 vehicle movements between 12th December and 18th December.

By 2015 this had further increased to 22,582 vehicle movements over seven days from 21st to 27th April.

Please note all this data was provided by Bedfordshire Police and the detailed breakdown can be provided to the Borough Council. **All the above data was recorded along Ravensden Road at the Vehicle Activated Sign which is located within the boundary of site 205. This data not only clearly demonstrates the high volumes of traffic on Ravensden Road, the unclassified rural lane but also the significant increase in the volume of traffic in recent years. The data provided also captured vehicle speeds during the data collection. The 2015 data collection also showed a staggering 40.9% of the vehicles were travelling at 35mph and above, this is 9,236 vehicles a week excessively speeding, so on average 1,319 vehicles per day. This is all verified Police data and clear evidence of Ravensden Road not being suitable for an access to a large development which is likely to include a school site. The danger to all vehicles and pedestrians if Ravensden Road is to be used as a site access will result in catastrophic accidents. This is all without taking into account if any one of the three proposed new settlements put forward would add further pressure and vehicle movements onto that part of the road network in the area and push more vehicles through Renhold as part of the established 'rat run' route.**

The above specific vehicle volume data along Ravensden Road also means Bedfordshire Police have identified this route as being a priority for speed enforcement action.

Sustainability

The proposed development area is not close to existing services and facilities in the urban area. The nearest facilities are Church Lane shops, which are beyond walking distance from the Ravensden Road site. Salph End has a small village shop / post office and a small public house, unlikely to meet the demands of 500 additional houses. This is turn will increase issues around parking at the local village shop which is situated on a dangerous bend.

The Parish Council have also been liaising with Senior Highways Officers at Bedford Borough Council for some time on the problems with excessive speeds along Hookhams Lane which is an unclassified road. Recent site assessments in 2016 and 2017 have identified a need for measures to be introduced to make the road safer for motorists and pedestrians. These are currently being taken forwards and so a further example of why the road is not suitable for further vehicles both in terms of volume and speed.

Insufficient infrastructure

The supplementary document states that the necessary supporting infrastructure can be provided. How much improvement of existing roads will be required if the village is to accommodate the traffic related to 500 additional dwellings and at what detrimental impact on being able to maintain Salph End as a small rural community.

The Parish Council cannot see any evidence, precedent or statutory statements that will prevent the landowners from saying they need more than 500 dwellings to meet the cost of infrastructure provision.

Landscape impact

No one is entitled to a view, but this land was previously identified as an area of special restraint to prevent the coalescence of Bedford and Renhold. **The consultation document refers to maintaining a visual gap between the urban area and villages, this is clearly contradicted by the Salph End proposal which totally fills this gap.**

Distinctiveness of nearby villages must be considered

Salph End is predominantly bungalows and low-density development. When the Planning Officers were questioned about the density of houses put forward and if this had been carefully reviewed and calculated, the Parish Council was informed that site developers would bring forward the final schemes which would be expected to be high density. **This is totally against planning policy guidelines. Such development would be out of keeping with nearby housing and there is no way such high density housing would blend into the**

landscape and community. It would have a detrimental visual impact and therefore is another reason that Salph End is not suitable for 500 houses.

Renhold Parish Council has always worked to ensure a 'dark skies' policy and except for 4 street lights associated with the average speed cameras there are no street lights in the village. This is a distinctive character. In modern new estates that are being proposed to be built in Salph End the inevitable street lighting would be totally out of keeping

Noise pollution

Sites 610 and 198 wrap around the Crossways Nursing Home and especially during the construction phase it would be subjected to unacceptable noise and disturbance.

Flooding

When reviewing the individual site assessments more than one of the sites proposed has a significant flood risk to part of the site put forward for development. **It appears inconsistent that these sites with identified flood risk and associated issues have been taken forwards when other sites across the Borough have been discarded for scoring a risk 3. A large proportion of site 198 and part of site 581 are historically recorded as having flood issues, which are even identified in the Allocations and Designation Plan policy document.**

Wildlife aspects

Within the individual site assessments there are wildlife that have been identified by the site promoters/landowners. **Local knowledge of how rich in wildlife these areas are have not been taken into consideration. This needs to be, given the uniqueness of the area as a part of the rural countryside which benefits from the brook flowing through the Salph End part of the village. The brook attracts a number of wildlife species such as otters, which would have their habitats affected by such significant development and associated ground and hedge/tree works.**

Renhold Parish Council would also like to highlight that the parish has seen its fair share of development in recent years with the increase in the parish population through the three developments north of Norse Road. In the consultation document the Borough Council have clearly set out some Group 1 villages which have seen significant growth in recent years have therefore been deemed not suitable to be developed as part of this strategy. However, Renhold which has already been developed enough by the increase generated by the three Norse Road developments is being focused on again. This is not acceptable and by placing Salph End in the urban area it appears an excuse to ignore the development and change the parish has already seen in recent years.

Further supporting reasons Salph End is not suitable

Whilst the Parish Council understand healthcare is not a Borough Council responsibility it is a significant area of importance for any local or future residents. The nearest surgery which is at Goldington Medical Practice at Church Lane currently has 12,500 patients already and has only just reopened to taking on new patients. **The surgery cannot sustain more than 13,000 patients, so given the population is growing, there would be no where for anyone to register which is unacceptable. People expect and need local healthcare facilities.**

The supporting education document contains numbers in which future pupil places have been determined using recent development across the borough area. The Parish Council would like to highlight an important anomaly detailed on Page 15 the Background Evidence Table which uses local housing within the parish of Renhold as an example. **It shows from the sample taken using four Norse Road areas a total of 484 houses with only 151 primary aged children generated. A one form entry has capacity of 210 children, this is a significant shortfall and would make any future school proposed unsustainable.**

Within the Settlement Hierarchy Methodology document there are inaccuracies on scoring of village facilities within Renhold. Given the uniqueness of Renhold having 2 SPAs it appears that when generating a total score for Renhold there was simply a combing of each individual SPA score. **This has resulted in an over inflated score which makes it look like the parish has more facilities than it actual does. The one bus service in the village as a result has been counted multiple times. This error must be corrected as it further demonstrates that however, the Borough Council try to show the area as having infrastructure, it simply does not, whether it is looked at as a parish or individual SPAs. This must be amended to reflect an accurate score.**

On review of the individual site assessments carried out there has clearly been an inconsistent approach when the sites have been scored in terms of sustainability. **Again this is inadequate as it is inconsistent and means that sites in Salph End which have scored less than other sites located in other other parishes/areas have been included, yet in the other parishes/areas they were discarded for not scoring sufficiently.**

With the proposals put forward by the Borough Council it will bring further unnecessary complexities and anomalies to how Renhold as a parish functions. Renhold will straddle different Parliamentary, Borough Councillor Wards, and Bedfordshire Police Team Areas. By taking this proposal forward it will further add to the difficulties of having important services provided to the local residents who as a result will suffer. This is not acceptable.

By having the proposed approach to education, the Parish Council are duly worried about the viability of the existing village school. If a new development comes to the village with the intended approach of a school being one of the first on site facilities at a new development, it will put undue financial pressure on the existing school in Renhold. The existing facility is likely to be negatively impacted by the building of a new purpose school estimated to have cost £4-5million pounds on a spacious 2 hectare site. This will seduce parents and children who will ultimately have parental choice in determining their school choice. As children leave the existing village school this will make budgets even more challenging which ultimately will realistically lead to a negative impact on educational standards.

There is also the impact the development will have on two other nearby village schools, Ravensden and Wilden, who have very small village schools, and are likely to be drawn to a new school, again raising worries about their sustainability.

Other Issues Arising

Another concern for the Parish Council which appears not to be covered fully within the consultation proposals is how legally binding will any landowner agreements be? **Where is the precedent that has been applied by the local authority and examples of enforcement action if landowners have not acted as they were intended to.**

There appears to be no mechanism to prevent landowners from applying for planning permission for their site individually. If this happens there is no clear process of how this impacts the other sites as part of a proposed preferred option. Wilstead have an anomaly with an application at Whitworth Way which was refused by the Borough Council, yet at planning appeal March 2017 was granted by the Inspector given it was a preferred site within the Local Plan 2035 draft document. **There is no safeguarding in place to give residents reassurance that piecemeal development will not start taking place imminently.**

There is no evidence of robust planning enforcement if landowner agreements are not met i.e. the Wixams S106 where none of the key infrastructure was delivered on time at any of the trigger points. These are all very worrying examples for the Parish Council of how such a proposed approach will bring about significant issues in the future for Renhold and other parishes.

There is very limited capacity in the parish Churchyard, and having more houses in Salph End, or anywhere else in the parish, means capacity issues for burials.

There are currently no footpaths on both sides of the two roads which would be affected by the proposals greatest, Hookhams Lane nor Ravensden Road. Due to the design and nature of the roads it would also not be viable to do this due to the ownership issues and the road simply not being wide enough to accommodate this.

Where else the development could go?

Freemans Common in Brickhill was a site initially recommended by Borough Council officers as a suitable urban extension in the draft consultation document. This site therefore should continue to be included. Particularly as it has a purpose built middle school for 600 pupils in the area that will stand virtually empty from September 2017 when Beauchamp Middle will have closed.

Kingsway is an area in the town centre already identified by the Borough Council Planning Officers and allocated for redevelopment as part of the Town Centre Action Plan. This site has greater potential to hold further residential development, so is naturally a more suitable site and it has been previously preferred by the Borough Council. It is a very sustainable site as well given its central location in town to a range of services and infrastructure.

Land North of Beverly Crescent is an area that abuts Bedford and sits between the urban area and Biddenham, and very close to the mainline station to London, and the north, so is more naturally located to service the needs of urban development growth.

The former Robert Bruce Middle School site in Kempston is within the existing urban area and is a vacant site which is ideal for development and has a number of advantages given its sustainable location to a number of key services and the local area school capacity.

The consultation appears to take no consideration that two Group 2 villages (Harrold and Oakley) already have two existing schools within their parish, yet they are not being looked at to take additional housing. This is again an inconsistency, it is not sufficient when the Parish Council challenged this during the consultation to say the schools are part of the Sharnbrook Academy Federation so the local authority cannot direct them. Local partnership working to provide the best solutions for the children of the borough should be the priority.

There are two school sites in Riseley, which is not covered or taken into consideration in this consultation. Again being mindful of the connection to Sharnbrook Academy Federation for this site, it is not sufficient to say this has been excluded when there is site capacity being left unused.

If the Borough Council took a combination of the above sites forward, then this would satisfy the development allocated to the urban extension and there would be no need for such development in Renhold.

Preserving Local Green Spaces in Renhold

The Parish Council responded to this consultation regarding local green spaces when Renhold had been allocated small scale development as a parish with two SPA areas. **Again the Borough Council have not given the Parish Council time to fully consider this very important element in light of a significant increase in the proposed housing allocation and how this impacted on the way in which the Parish Council would have responded to associated local green spaces consultation.**

The decision to not designate any areas of Local Green Space within the parish of Renhold is astounding given the parish has designations of areas as Village Open Spaces identified under the Allocations and Designations Plan. It seems rather inconsistent that all protections of valuable open space/green areas in the parish have been removed at the same time 500 houses are being proposed. **It seems that this non allocation is based on convenience, given that the proposed designated sites preferred by the Borough Council in the Local Plan. To reject designation because of no evidence of its use for leisure activities when no evidence was requested when making the applications is unreasonable. Also if the Parish Council had realised that >10hectares would be a discriminator then rather than submit applications for designations of large pieces of land for designation the Parish Council could have divided the land up into smaller portions like other Parish Councils did.**

Conclusion

In summary the Parish Council have set out significant reasons to demonstrate why Salph End is not suitable for 500 houses and why it is not suitable to become part of the urban area boundary of Bedford Borough. With this evidence it clearly shows why Renhold **MUST** retain its Group 3 status and not be considered for taking development as part of the urban extension. It has been shown that such development in Salph End is against the Borough Council's own current, recently reviewed, planning policy statement. In addition the highways evidence provided in the Parish Council's response with the Police data, also demonstrates the unsuitability of unclassified rural lanes to take such development.

