

19/01974/MAO outline application with all matters reserved except access for up to 400 dwellings, land for a new primary school, open space, drainage, footpath improvements and vehicular access via 25 Hookhams Lane

The Parish Council strongly objects to this outline planning application for proposed development on this land and the proposed access onto Hookhams Lane.

As an over-riding comment, Renhold Parish Council wishes to highlight and reiterate that Renhold is not required in the adopted or the emerging local plans to identify land for additional dwellings, so any proposal for additional dwellings lies outside local plan policy. As the Officer will no doubt be aware, Salph End was in fact rejected by the Borough Council earlier in preparation of the local plan.

The Parish Council wishes to note their disappointment in this application that the applicant constantly refers to the location as Salph End, Bedford, completing ignoring that Salph End is in fact one of the many very distinct ends in the Parish of Renhold. It is NOT an estate in Bedford.

The Parish Council feels that all the previously submitted concerns raised by the Parish Council, and the hundreds of Renhold residents who engaged in the Local Plan consultation process, must be retained as justified planning reasons as to why this application must not be granted permission. The proposed application is fundamentally unsound as it goes against a number of local and national planning policy principles which the Parish Council explains below.

Furthermore, the Parish Council wishes to highlight a number of concerns within the supporting documents that are associated with this application, which not only raise significant concern but also show the unsuitability of this area for any type of development.

OVERALL

- The site lies outside the Renhold: Salph End Settlement Policy Area.
- Notwithstanding the demolition of the property at Hookhams Lane, the proposal represents backland development.
- The site proposes an 'at depth' development which is out of keeping with the surrounding area and street scene. The street scene is made up of linear design so if this application is granted it is going to set a precedent for Salph End.

LOSS OF VILLAGE CHARACTER

Salph End [including Ravensden Road] has a current total of just 231 dwellings, so a proposed development of 400 dwellings will swamp it, as it will nearly double it in size. The Parish Council feels that this will totally destroy Salph End's rural character. This proposal is a significant increase which is clearly over development and superfluous to a village that already has 1375 houses.

CURRENT PLANNING POLICY

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

- Renhold has always been recognised as being unique in 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 suggests 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 rural character and unique identity of Salph End. It would also bring about the coalescence of Salph End with areas of Bedford which current planning policy sets out should not happen.
- 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 suburban bungalows

on small plots which are uniform style. Nevertheless, they are clearly 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 metres east of Hookhams Lane. There are no employment, education or health-care facilities in Salph End apart from 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 housing 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 any development at Salph End is fundamentally against the Borough Council's own and current planning policy document.

HIGHWAYS

It must be remembered that Hookhams Lane also is a road that has a 7.5 tonnes weight restriction given it is such a small, narrow road unsuitable for large vehicles, this evidences that the road structure is not sufficient to have high volumes of vehicle movements on it.

The information enclosed in Appendix 1 clearly identifies that the Ravensden Road/ Hookhams Lane route is an established 'rat run' which traffic uses to come into the village through. Borough officials have been unable to find adequate solutions to calm existing traffic levels. So the roads most certainly cannot support increased traffic flow and the forecasts predicted in the plan are unfeasibly low. Since the installation of two sets of average speed cameras, traffic has been displaced and it now travels along Hookhams Lane. As a result, the increase in volumes and speeds of traffic along Hookhams Lane is very noticeable throughout the day, and particularly at peak flows. Having a large housing development which relies on direct highways' access onto this rural 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.

The Highways and Transport 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 the proposed development site is off an unclassified village road which is in very poor state of repair and has evolved on the ancient historical routes which were not designed or engineered to modern highway standards. This village road is wholly unsuitable to sustain the large volumes of

traffic that will result at the peak times- particularly as the TRO appears to be unenforceable.

If you consider the 3 nearest 'urban extensions' which are all within the Parish of Renhold ('The Spires', 'Aspire' and 'Thor Drive/Cranbourne Gardens'), they all have roundabouts off Norse Road which are designed to modern DRMB highway standards. Any significant housing proposal such as these homes should ensure that the highways highway standards applied. It is clear that a roundabout cannot be accommodated in Hookhams Lane. The urban extension at Brickhill has a roundabout off Tyne Crescent which 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 and detrimental impact on a rural group 3 village. 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 it just cannot accommodate the required new access points.

The road in Hookhams Lane does not have footpaths on both sides along both sides, which means pedestrians have to regularly cross the road in order to reach their destination. One example is that 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 shops, 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 that this is not a safe or sustainable route for pedestrians, many of whom are likely to be families with pushchairs, children on scooters/bicycles and our many elderly residents who use mobility scooters. The safety considerations highlighted above further highlight the fact that any development would require significant upgrades to the highways structure of the village in order to provide the required sustainable links that would be expected from any sustainable urban extension.

The NPPF, highway design standards (DRMB) and local policy require high quality pedestrian and cycle links. 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 insufficient room with the narrowness of Hookhams Lane to accommodate a footpath or indeed a cycleway. Such changes would require significant engineering and would have a seriously detrimental impact on residents' well-being, including the potential for the removal of their front gardens.

Furthermore, consideration must also be given to bus access into and out of the new development. This has not been taken into account within the proposed application. Moreover, the design considerations for buses at junctions dramatically changes the design 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 streetlights 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 and protects the much cherished dark skies policy.

The Parish Council also feels it important for the local authority to be aware of 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 adjacent to the site boundary. 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. With the Traffic Regulation Order restriction at Church End in Renhold, the traffic naturally flows along Ravensden Road and then along Hookhams Lane. Then vice versa during the evening peak traffic flow. This is further evidence that the proposed entrance being on a busy, narrow road is not acceptable. In addition, this data adds to the evidence that over time the volume of traffic in/out of Salph End has increased dramatically.

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 the highways issues in Salph End not being suitable for an access to a large development which is proposed to include a school site.

The highways' access to the site is an important concern for the Parish Council as Hookhams Lane is an unclassified rural road that is narrow, has several bends and is poorly maintained. Any overflow parking on the road from the proposed new estate would be unsafe and would increase the likelihood of a serious accident. The proposed access into the site appears to be very narrow. Furthermore, it appears that this narrow entrance is to be main access into the development which will have to take construction traffic if the application is granted and will, in the long-term, if permitted, will have to be widened for essential access to emergency services. As this entrance will be in the immediate vicinity of neighbouring adjacent properties, there are significant concerns over noise pollution and potential structural damage to the houses nearby.

LANDSCAPE AND LOCAL ENVIRONMENT

The Parish Council understands that no one is entitled to a view, but this land at Salph End was previously identified as an area of special restraint to prevent the coalescence of Bedford and Renhold. The rural identity of this area must be retained. Furthermore, this land is distinctive as it clearly defines one the five 'Ends' of Renhold.

The documents state that 'built form relates well to the existing village of Salph End'. The Council feels that the proposed build form will totally dominate the existing village both in terms of the numbers of properties and the traffic generated; problems which will negatively impact on the safety, health and welfare of existing residents.

Open space is concentrated to prevent coalescence with the Bedford urban area. The open space is concentrated where there are flooding issues and questions about loss of existing habitats; not where it will best meet the needs of and be accessible to residents of either the new development or Salph End – which has no open space provision but relies on the openness of the fields around it.

The Parish Council is concerned with the impact on the local wildlife species from this application. The arboricultural impact is also of concern as this area is a haven to local wildlife. The Council challenge that there is no evidence of protected species. 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.

The Parish Council is disappointed that as the applicant states that because existing hedgerows will be retained that there is limited impact, as the reality is the intended decimation of an open space with already thriving natural habitats.

There also needs to be recognised that changes to existing water courses (i.e. drainage ditches - capacity and flow rates) would impact on established Lepidoptera (Butterflies and moths), Aeshnidae (Dragonflies and damsel flies) and other aquatic invertebrates (water fleas, boatmen, fresh water leeches) which would have a knock on effect on fauna further up the food chain.

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 this proposal for a modern new estate in Salph End the inevitable street lighting would be totally out of keeping with both the dark skies policy and Renhold's already stretched rural identity.

FLOODING AND DRAINAGE

There are significant drainage concerns with the land as it is prone to being saturated. The applicant states that drainage will ensure that existing on and off-

site flooding issues are not exacerbated: surely a development of this scale should be resolving those issues, not adding to them.

The application also identifies a potential increase in construction costs because of the nature of the challenging ground conditions – namely high plasticity, likely to shrink and swell. The Parish Council would like to advise that local knowledge confirms that when Home Close was built, extra deep foundations were required because of the nature of the ground conditions.

The application concludes there will be a low risk with the measures proposed once implemented with foul water going into the existing sewer in Hookhams Lane. However, the documents are contradictory and state that there may be insufficient spare capacity and that a new foul water sewer will have to be laid along Hookhams Lane. This seems impossible and the Parish Council would question how that is going to be managed effectively given existing traffic volumes on Hookhams Lane.

HERITAGE

There is no supporting information relating to archaeological assessments of the site. This is short sighted.

The Parish Council also feels given the immediate proximity of this proposal which is adjacent to a Grade II listed building, Wentworth House (Ravensden Road), this development by its nature will impact negatively on that listed building in its setting which must be protected as an important local rural heritage asset.

INTERNAL SCHEME DESIGN

The Council would be concerned with the majority of parking within the design will be on-plot and off-street: this implies some parking, by design, will be on-street, which is unacceptable.

The mix of housing proposed is completely alien to the character of Salph End which has a good mix of dwelling types and sizes but predominantly bungalows, so this is not a sensitive extension of the existing village.

LOCAL INFRASTRUCTURE AND SUSTAINABILITY

The supplementary document states that the necessary supporting infrastructure can be provided, yet there is no detail in the outline application as to what and how much improvement will be made. Surely there will need to be improvements of existing roads if the village is to accommodate the traffic related to this high volume of 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 the proposed 400 dwellings to meet the cost of infrastructure provision.

From such a development there will naturally be a demand and high level of need to access local shops, services and amenities: it is clear that this means mainly in Bedford, ie Church Lane, which residents from this development are no more likely to walk or cycle to than existing residents of Salph End. The traffic generation seems to assume that a significant proportion of trips will be on foot, bicycle or using public transport. The Council would like to highlight that this is not a sustainable location and will place a greater reliance on the private car than the applicants suggest.

Whilst the outline application provides a site for a local school, there is no supporting information as to how or why that need has been identified. The Parish Council who had regular communications with the village primary school are not aware of primary school places being in demand locally. It is hoped that the local authority will seek clarity and guidance from the education Officers on this part of proposal as there currently a surplus of primary school places locally, for example many local schools are not presently at capacity.

Given there is no local need for a school and that it cannot be guaranteed for this purpose, the Parish Council would be concerned that this is a way to seek future planning gain for the applicant to come back to ask for housing on that area too.

The Parish Council would also like to point out that 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.

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 and they would like to highlight this. 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. (Tidy up below and expand more reasons why)

The proposed development area is not close to existing services and facilities in the urban area. The nearest facilities are the Church Lane shops, which are beyond walking distance from the Ravensden Road site. The De parys Medical Centre situated at Church Lane has regularly closed its books over recent months as it has reached patient capacity and cannot attract new GP partners. Salph End has a small village shop / post office and a small public house, which is too small to host village functions-let alone meet the demand of 400 new houses. This proposed development in turn will increase issues around parking at the local village shop which is situated on a dangerous bend. 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. The Parish Council has 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 and they have yet to find a way of curbing ever increasing traffic speed and volume. The Parish

Council is in the process of buying two SIDs, one for Hookhams Lane and the other for Ravensdent Road-the very two roads which lie at the heart of this proposed development. It would appear that the distances measured in this proposal tend to be measured to the Hookhams Lane access: much further to the back end of the site, possibly double, so surely this statement will not stand up to closer scrutiny. The proposal states that you are not aware of any deficiencies in the footway network which would prevent or significantly reduce the likelihood of residents walking to / from the development site. Perhaps a site visit would be in order for you to clearly ascertain that there are no continuous footpaths in any part of the village. Furthermore, the lack of street lighting means that it is very dark at night, so most residents travel even short distances by car.

AIR QUALITY

The Parish Council is worried about the sensitivity of the area to dust soiling on property and people is high during construction. The predicted impacts are over a wide area, eg A4280 Goldington Road, so actually this is detrimental to a high number of Renhold and Borough residents. Overall impacts during construction are considered by the applicant not to be significant, and after construction from traffic are considered negligible. The Parish Council would challenge how 400 additional properties will have a negligible impact in terms of air quality on properties on Hookhams Lane, given the weighty supporting information within this response.

NOISE

The Parish Council is most concerned that acoustic fences would be required for 25 and 29 Hookhams Lane to protect those residents from vehicle noise. Furthermore the requirement for a 1.7m acoustic fence at the new junction to protect new properties from noise from Ravensden Road is unacceptable in a rural village and shows that there will be a significant impact on the immediate properties.

Appendix 1

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 find sustainable solutions to the problems that these new major road links have created and 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. One significant consequence is that traffic now uses Hookhams Lane as a short cut instead. Another is that the Ravensden Road route has become an established 'rat run' for the traffic entering and leaving the village. Previously, traffic continued travelling through the village onto the bypass junction through Church End. Since the installation of the average speed cameras this traffic has been displaced 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 an 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.