

OVERVIEW

This document represents the considered response of Renhold Parish Council to the strategic proposals set out by Bedford Borough Council (BBC) in their consultation conducted June to July 2022.

Our Approach to the Consultation

Renhold Parish Council is experienced in understanding the due process relating to public consultations and is therefore mindful of the importance of presenting clear and robust evidence at all stages, but in particular at this part of the consultation process, to ensure that Renhold Parish Council makes clear its view as the first tier of local government. The Parish Council, has a further role as always, serving its electorate and ensuring they are supported throughout this phase, so considerable work has been done ensuring they are not only aware of the proposals and their direct impact on the parish, but also in engaging effectively in the consultation process.

The Parish Council also feels at this stage in light of the Local Plan shortly being taken forward to government examination, that with such a significant development earmarked and set out in the parish of Renhold within this strategy document, that it is important to reiterate items that have previously been expressed.

Renhold Parish Council, as usual, has been extremely pro-active in attending BBC led consultation events directed at local parishes, as well as the various public engagement activities within the consultation run by BBC. There has been a thorough review of the consultation documents, throughout the consultation period, as Parish Councillors have strived to understand more about the many different technical and complex items being considered. This is in addition to a huge number of important accompanying planning policy documents which will shape the future of Renhold and communities across the Borough.

The Parish Council has facilitated a number of different ways to encourage Renhold residents to engage with this consultation process, whether directly to BBC representatives or through feedback to Renhold Parish Councillors. Throughout this consultation it has remained an absolute priority that all in Renhold are aware of the enormity of the proposals, and that they can have their say and their voice heard. This has included using a village electronic circulation list, website publications and social media posts. This is in addition to multiple communications made to the village population through the village magazine along with residents being welcomed to the June and July Parish Council meetings. The Parish Council also arranged a specific drop-in session on Thursday 14th July at Renhold Village Hall to enable residents who had questions and/or required assistance with understanding to engage in responding to the consultation. The Parish Council knows the proposed allocation within the draft Plan is of interest to residents as over 40 individuals attended the drop-in session.

It is equally important to recognise that Parish Councillors are lay persons, volunteering their time, trying their best to review, consider and digest all the information relating to many different technical aspects of this Local Plan process. Renhold Parish Council also does not have a full complement of Councillors at present, with only six available. In addition, it is important to recognise that there is a large volume of associated policy documents being consulted on, which again are also complex, however, we understand that they are fundamental in the wider context of the proposed development strategy. So, it has been exceptionally challenging ensuring this consultation and the significant proposal for Renhold is effectively engaged with.

The above difficulties during this consultation have also impacted on opportunity for meaningful engagement with neighbouring areas, which, like Renhold, are at capacity. This part of the Borough has been experiencing an exceptionally busy period of consultations relating to the Local Plan as well as East West Rail. This has taken an unprecedented amount of volunteer time in light of so many consultations impacting on this part of the rural countryside in the north of Bedford.

As a result, it was important to Renhold Parish Council that they focus on the impact the proposed allocation would have on Renhold - the area known best to Councillors.

RESPONSE SUMMARY

The Council has developed comments relating to a number of different policies of the draft Plan document, these will be expanded upon later in this document under the requisite headings. In summary, this consultation submission will reflect the supporting evidence collated from various local resources, thus enabling Renhold Parish Council to provide information for Planning Policy Officers.

1. Fundamental unsoundness of the Plan

The Parish Council feel it is important to set out concerns relating to the soundness of the Local Plan which result in the Plan not being fit for purpose.

2. Misleading consultation representation

It is important to recognise that the document has been misleading in how the specific site policy has been represented which has resulted in misleading representation.

3. Policy EMP6 - Business Park, Land At Water End and St Neots Road

This section will focus on Policy EMP6 Business Park, Land at Water End and St Neots Road, setting out a number of matters to bring to the Officers' and Inspectors' attention.

4. Coalescence

The increasing growth of Great Barford combined with the Policy EMP6 Business Park, Land at Water End and St Neots Road threatens the separate identity of Water End, Green End as well as Renhold, which needs to be clearly maintained.

5. Wildlife and habitat

The Parish Council would like to highlight the detrimental impact Policy EMP6 Business Park, Land at Water End and St Neots Road would have on this.

6. Historic buildings and heritage assets

It is important to recognise how any nearby, local heritage assets and their settings would be impacted on by the proposed Policy EMP6 Business Park, Land at Water End and St Neots Road

7. Renhold Neighbourhood Plan

The Renhold community has been preparing a Neighbourhood Plan since late 2019 and has had problems with support for the process during the Covid pandemic. Consequently, it would not wish the Local Plan to pre-empt the important work that has already been undertaken and is ongoing.

8. Other associated planning policies

Comments being made in relation to some of the supporting planning policy documents in conjunction with Policy EMP6 Business Park, Land at Water End and St Neots Road.

9. Mitigation measures

Without prejudice, the Parish Council feel it is necessary to include a comprehensive summary of adequate mitigation measures that must be provided and representation at all stages as a major key stakeholder, if Policy EMP6 Business Park, Land at Water End and St Neots Road was to be taken forward.

10. Conclusion

This sets out the Parish Council overall feedback to the consultation.

SECTION 1: FUNDAMENTAL UNSOUNDNESS OF THE PLAN

The Parish Council having reviewed the Local Plan and associated planning policy feel the document is unfit for purpose and unsound as it does not meet current National Planning Policy requirements.

The Parish Council believe the draft Local Plan 2040 is unsound as it fails to meet the fundamental requirement of achieving sustainable development, as set out in Section 2 of the NPPF 2021. In particular, the overarching objectives, *“which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

Furthermore, para 16 of the NPPF expects that:

“Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development¹*
- b) be prepared positively, in a way that is aspirational but deliverable;*
- c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”*

Housing and Employment growth calculations

Policy DS3(S) on Page 28 anticipates a total of 27,100 new houses being built during the period 2020 – 2040, it is noted that this will bring 63% of new houses being delivered in the period 2030 – 2040. Policy DS4(S) outlines the calculations that a total of 26,700 new jobs being created by the end of the draft Plan period. Having an employment provision, which is inline with the new houses provision does not seem logical. There is no known employment or housing crisis in Bedford borough that would therefore require one or both of the employment or housing figures to have been calculated to produce such an unusual trend of such a similar supply need for both. The data shows an additional 26,700 jobs being created during the life time of the Plan represents a 34% increase over the current workforce, which appears to be unrealistic.

¹¹¹ This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004)

SECTION 2: MISLEADING CONSULTATION REPRESENTATION

The Parish Council would like to highlight a number of fundamental flaws to the consultation document relating to the misleading naming of Policy EMP6 Business Park as Land at Water End and St Neots Road. Borough Council Officers have maintained that sites were being classified by their geographical locations, this however has not been a helpful or real representation for the Renhold community.

The theme throughout the Local Plan with policy naming has been allocating names clearly attaching them to the nearest settlement. Neither Water End nor St Neots Road, parts of Renhold Parish, have any designated Settlement Policy Areas as they are so rural.

There is a Water End to the south of Cople, as well as a St Neots Road in Great Barford, in Little Barford and in Bolnhurst. This poor naming therefore made it very unclear as to where the proposed site allocation was to be actually located.

Secondly, it only became clear during a drop-in session with the Planning Staff at the Howard Centre on 20 Jul that sites 761 and 764 comprising EMP6 were in fact identified in the Changes to the Policies Map (supporting reference 52). As early as May the identity of the relevant sites had been sought by a community researcher from the Planning Office which failed to draw attention to the clarification available in Reference 52. Prior to 20 Jul therefore there existed uncertainty within the community as to the actual extent of the EMP6 proposal.



This image shows the location of the only 2 homes (2 & 4) in Water End, Renhold which are located 150m north of the adjacent A421 interchange roundabout. As shown the road name then changes to Green End and continues past the EMP6 site for over 300m before the next house at 62 Green End. It would have been more meaningful to the local community to describe 761 as land at Green End, Renhold.

There is no mention in the Consultation document that the implementation of EMP6 would effectively merge Green and Water Ends.

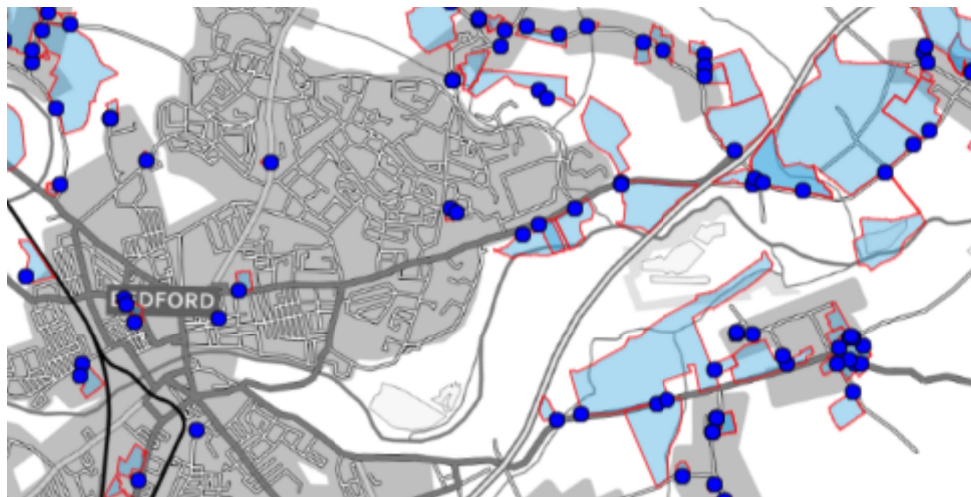
This inaccurate naming combined with the failure of the local authority to point to relevant map information showing the proposed site allocation within the consultation supporting documents is a significant issue.

Figure 12 Key Diagram, Page 83 in the consultation document sets out an overview of proposed development for housing and employment sites. However, the marking of the map again is misleading in how it represents the sites – mainly due to its coarse scale which makes it a poor complement of the LP2040 document and it fails to identify Renhold as illustrated below.



Below is an extract from the Borough Council 'Call for Sites' map found at: <https://bluefox-tech.co.uk/demos/bedford-published-sites/#/center/-0.4205,52.1983/zoom/13.3>

It shows the sites in blue put forward and below it the extract containing EMP6 together with the equivalent section of the Fig 12 Key Diagram:



When looking for the sites comprising the proposed EMP6, based on the poor descriptions used there is no certainty of which two sites are potentially involved. Focusing in on the A421 junction in the two equivalent extracts below illustrates the problem. Note that Renhold is not identified on the Key Map.



Initially, and for quite some time it appeared the proposed allocation was in fact the sites marked with red arrows.

Residents who did try to study information attached to the designated sites would have been confronted by supporting statements, access appraisals and connections plans dating back to Aug 2020 which bore no resemblance to what is now being proposed and were therefore irrelevant at best and misleading at worst.

This misrepresentation of information may have resulted in many not understanding the proposals as often when individuals see no direct impact, they do not go into a more in-depth review of the consultation and refrain from providing feedback. This is relevant to those who live not only in Renhold, but also those who live in Great Barford who also have been denied clarity. The knock-on impact of this inaccurate site naming will also spread beyond the nearest settlements, with many across the borough having no idea where ‘Water End’ or ‘St Neots Road’ is – other than maybe concluding it must be near St Neots and so of no local relevance.

Making no association to Renhold within the policy site name, may be seen by some as an attempt from the local authority to disguise significant development for a very rural community.

The representation of Policy EMP6 Business Park, Land at Water End and St Neots Road in this consultation has been done inaccurately.

The late revelation of the existence of the Reference 52 Changes to Policies Maps highlighted an important shortcoming of the proposal. A section of the relevant Map 2 below clearly emphasises the separation gaps between Church, Salph and Green Ends of the original rural village and the new developments along Norse Road. There is no attempt to emphasise any comparable gap between the proposed EMP6 site and either of Green or Water Ends.



SECTION 3: POLICY EMP6 - BUSINESS PARK, LAND AT WATER END AND ST NEOTS ROAD

The focus of this section is on the proposed Policy stated in the consultation document on Pages 79 and 80 relating to **Policy EMP6 - Business Park, Land at Water End and St Neots Road**.

Site Context Overview

This site is positioned within 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 areas of the Parish comprise of 6 ends – Water End, Green End, Top End, Church End, Salph End and Struttle End – separated by small tongues of farmland. The unique character of each of the ends was, and still is, essentially linear with properties fronting the lanes that connect the ends. Since then, these parts of the Parish are essentially unchanged with the ends connected by unclassified lanes but separated by undeveloped agricultural land/open countryside.

The Parish Council feel it is important at this stage of the strategic development framework process to outline some vital, important local factors, which must be remembered and taken into account by those considering the soundness of this draft Local Plan.

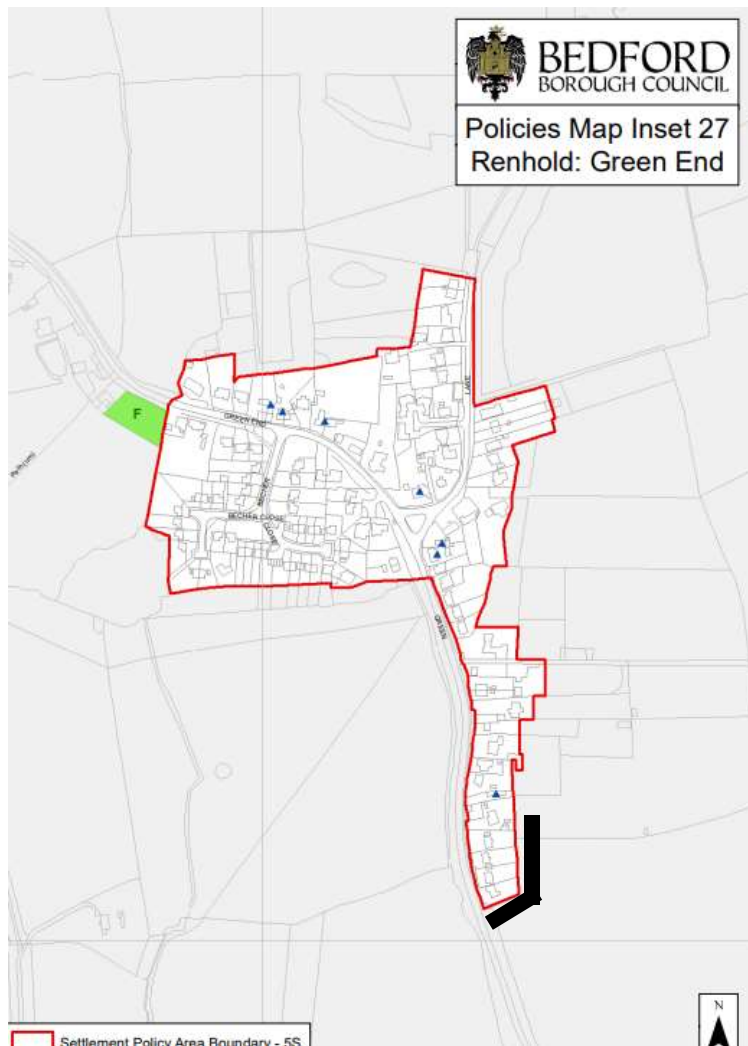
The construction of the Water End junction of the A421 and completion of the A421 between the A1 and the M1 created a destination that attracted vehicles of all classes to use Renhold's lanes as a short-cut from the west of Bedford to the A421. This was recognised in the Public Inquiry when the A421 was being considered, where it was stated that the bypass would have a detrimental impact on Renhold. More detail on the local highways network will be set out in this section, however, it is important to recognise that Water End and Green End have in recent years suffered from significant remodelling of public highways. In addition, within Green End and Water End road signage for traffic is extremely poor, with more specific information on the traffic management issues detailed below on Pages 12, 13 and 17.

Policy EMP6 references Water End and St Neots Road, however, the western site sits within Green End. This is something the consultation does not recognise, although the Policies Map Insert 27 Renhold: Green End as part of the Bedford Borough Local Plan 2030 document that was adopted on 15th January 2020, clearly demonstrates this.

Below, Document A illustrates the Settlement Policy Area of Green End currently, and the Area highlighted with a black line shows that Policy EMP6 sits alongside the Settlement Policy Area. Water End does not have a Settlement Policy Area. As a small rural village with small dispersed settlements of hamlets and isolated dwellings, there are actually only two Settlement Policy Areas (SPAs): one at Salph End and this one at Green End. Renhold Church End and Renhold Top End are defined as small settlements, whereas Water End and Struttle End are areas outside of SPAs and small settlements. This clearly shows the rural nature and environment beyond the SPA of Green End, i.e. countryside.

Site EMP6 earmarked for 'a modern research campus-style development, primarily for research and development with elements of manufacturing, warehousing and distribution' in terms of local context does not sit naturally alongside a linear rural settlement.

Document A – Green End Settlement Policy Area



Document A illustrates the Green End Settlement Policy Area with the area marked by black lines representing the site boundary for EMP6.

Current Planning Policy applicable to Renhold

Renhold has always been recognised as being unique in all previous framework and development strategy documents. This is even documented in the Borough Council's planning framework document, Allocation and Designation Local Plan 2013 which in Section 15 deals with the urban area boundary and local gaps. Policy AD42 specifically deals with coalescence between settlements and the importance of local gaps, aiming to prevent '*coalescence between the urban area and nearby villages*'. This 2013 Plan document has not been superseded by the adoption of the more recent Local Plan 2030 strategy framework document, so it is important to be aware of the policy as it is still relevant.

Furthermore, Policy AD42 (Local Gaps) with its supporting text 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.'

Paragraph 15.9 goes on to also explain that the policy *“also takes into account that local gaps are generally narrow and limited in extent such that any development could seriously affect their openness and could be seen as contributing to visual or physical coalescence. The appropriate width of a local gap is likely to be no more than 1 mile (1600 m) in extent and may be much less.”*

This is further reinforced by the reference that recognises Renhold to be unique and its ‘ends’ show *“separate character and identity”*. With regards to Renhold (Green End), paragraph 15.13 states that *“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.”*

This is clear evidence that Green End, as one of the two identified SPAs in Renhold, is a rural built-up area of condensed and primarily linear form that benefit from important local gap designation and subsequent policy protection. In line with the objectives and requirements set out in Policy AD42, developments in or adjoining a local gap should be refused as they would:

- result in the visual or physical coalescence of settlements;
- reduce openness and adversely harm the undeveloped character of the gap;
- harm the separate character, setting and identity of the settlements.

During the preparation of, at the time what was known as the Local Plan 2035 document, Renhold was identified as a Group 3 village, continuing to have two SPAs at Green End and Salph End. When the Parish Council sought guidance and clarity from the Bedford Borough Council Planning Policy Officers in May 2017 regarding the associated supplementary document relating to the Urban Area Boundary Review 2012 and the Local Plan 2035 document, 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 above clearly states from Sections 2.8 to 2.11 how Green End should be dealt with acknowledging its characteristics and setting.

During the preparation of the document previously known as Local Plan 2035, which went on to be adopted as the Local Plan 2030, at no point did it include any intended changes to the Urban Area Boundary policy AD41. Whilst the Parish Council have made their desire very clear on multiple occasions to Planning Policy Officers, to see greater protection for all local green and open space areas within Renhold that lay between the various ends and urban area. It is understood that there is no intention for the Urban Area Boundary to be changed that affects Renhold parish, and that the Renhold Neighbourhood Plan process will be the suitable route to include relevant policies to protect and reinforce important local gaps/buffer zones between the rural built-up areas of Renhold and the urban area boundary. It is also relevant to note that the majority of the Renhold ‘ends’ sit on higher, elevated ground overlooking Bedford.

Located on Bedford Borough Council's Development Plan documents webpage is a link to the Bedford Borough Local Plan 2030 document that was adopted on 15th January 2020. On Page 189 of the document, it clearly shows that AD41 and AD42 are current.

| Allocations and Designations Local Plan Policies (2013) | Status – Delete, replace or save | Proposed policy in Local Plan 2030 |
|---|----------------------------------|------------------------------------|
| AD39 Cycling | Save | |
| AD40 Village Open Spaces and Views | Save | |
| AD41 Urban Area Boundary | Save | |
| AD42 Local Gaps | Save | |
| AD43 Urban Open Spaces and Gaps | Save | |
| AD44 Former Land Settlement Association Area | Save | |

This clearly shows that the allocation of EMP6 is in breach of the Borough Council own planning policy in that all aspects of Green End and Water End, and its immediately surrounding open countryside must be protected in order to retain its character, setting and separate identity.

EMP6 Policy Wording

Types of Employment

Throughout the Local Plan document Bedford Borough Council have draft allocated employment sites with the wording 'a modern research campus-style development, primarily for research and development with elements of manufacturing, warehousing and distribution'. This is a very generic statement for a number of significant areas of land within the borough. By having made such a sweeping statement of uses (ranging from Use Classes B2 and B8 to Use Class E) enables a site to potentially come forward with any one of those or all of those outlined. A 30 hectare sized site being used for research and development, differs hugely from a 30 hectare site being used for warehousing and distribution, including physical and technical requirements and space together with associated demands and consequences.

Planning policy words that are so broad are subjective, in that if it is not concise and clear on what the purpose of the site is, that it becomes unmanageable at masterplanning and outline planning application stages. What may be intended by Planning Policy Officers in reality is then broadly something quite different, and it is the local residents who have to live with that adverse changes and impact for generations to come.

The evidence within the subsidiary planning policy document (Employment Land Study 1 and 2) of there being a need for such a large site not only at EMP6 but also other sites to take 'modern research style development' is weak and imprecise, failing to meet the golden rule, which is that policies should be clear, concise, positive, relevant and capable of being delivered.

Traffic Movements

The language used within EMP6 on Page 79, Paragraph 4.97 references 'particular attention should be paid to the impact of additional traffic movements on the junction'. Over a number of years, the Parish Council worked with the former Bedfordshire County Council and the more recent unitary council, Bedford Borough Council. Officers both from organisations have always worked hard to reduce the volume and speed of traffic through the parish. Firstly, traffic lights

were installed near the Church at a particular pinch point, then a Traffic Restriction Order (TRO) 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 implementation of the TRO supports 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 but not the traffic volume generally.

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 Ravensden Road and onto Hookhams Lane. As a result, the increase in volumes and speeds of traffic along these roads is very noticeable at peak flows. Nevertheless, all traffic now flows from one side of Renhold parish through to the other side and now congregates at the A421 interchange junction.

This recognition of the 'particular attention' identified already is critical, as the ongoing government funded work to improve highways infrastructure by Bedford Borough Council through the Transporting Bedford Initiative did not look to improve this intersection which is the main artery for vehicles entering Bedford from the east.

Residential Buildings

Also, within EMP6 on Page 79, Paragraph 4.97 references 'ensure there is adequate separation from the exiting residential buildings at Green End'. Again, there is a recognition of issues with the site proximity to Green End, with the policy stating 'buildings' rather than settlement or houses. Buildings make the structures sound unimportant, when in fact they are people's homes.

There is also no reference to the pair of Howbury Estate semi-detached cottages known as Nos. 2 and 4 Water End and pictured earlier which will be totally surrounded and absorbed by the proposed allocation. They are highlighted in Document B with a red arrow.

Document B

Prior to the revelation of the existence of a revised Policies Map collection (Supporting Reference 52) the following map was constructed to aid local understanding. It shows site numbers 761 and 764 in larger scale with surrounding existing infrastructure. Nos 2 and 4 Water End are indicated by a red arrow and to the south 6 further unreferenced impacted properties are identified by blue arrows. The annotated letters A, B and C identify the camera positions for 3 panoramic views included further below.



EMP6 Site Constraints

The Parish Council have reviewed the Policy EMP6 wording on Page 80 of the consultation document and have the following observations to make.

Local character/landscape

The land is elevated with its highest points located in the north and gradually falling towards the bypass and beyond to the south-east. Any development on the land would be prominent within the open and rural landscape context.

Water End and Green End are predominantly linear with low density built form, primarily housing, surrounded by agricultural land. The proposals would be out of keeping, out of scale and clearly disproportionate to the size of the Parish. The allocation would result in an urban built environment of significant depth, which would neither complement nor be compatible with the linear character of this part of Renhold and would contribute to unacceptable urban sprawl.

The village of Renhold comprises of 5 ends [Salph End, Church End, Top End, Green End, Water End] and three new estates. This is its distinctive character and the addition of a large business park at Water End would be totally alien and harmful to this character. The sites are rural locations, between the built form of Renhold Green End and Great Barford, and sparsely

populated. As such, any development on these allocated sites would dominate the rural, open landscape and be out of keeping.

The sites are not gateway locations into Bedford as they do not abut the urban boundary of Bedford. Instead, the northern site adjoins the settlement policy area of Renhold Green End (a small nucleus of residential units), and the southern site does not adjoin any settlement policy area.

Photographs

Three photographs are included below to illustrate the landscape of Sites 781 and 764. The viewpoints of each are marked on Document B and the angular fields of view are stated which in 2 cases were achieved by joining multiple images.

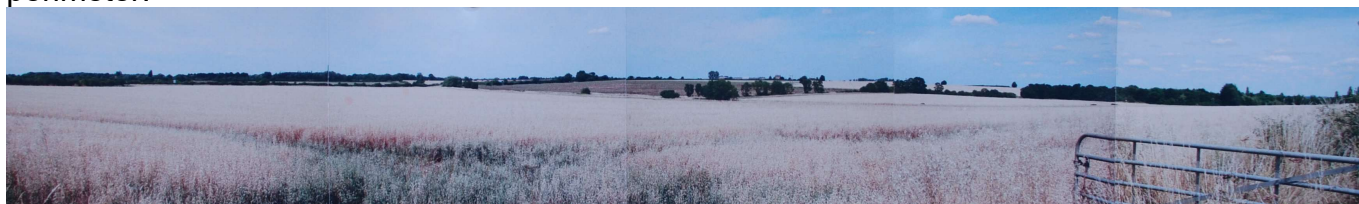
View A (80°) across 761 from an upstairs rear window of 62 Green End. The E and SE portions fall away from the initially gently rising ground:



View B (165°) from the A421 spanning 764 to the S round to and across 761 to the N. Taken from the E boundary of both sites (above Cuckoo Brook):



View C (150°) of 764 from opposite Dairy Farm Cottage spanning the whole of the N and E perimeter:



Environment

The sites are best and most versatile (BMV) agricultural land as defined in the NPPF and should be protected from significant, inappropriate or unsustainable development proposals.

Building height

Any structures and associated infrastructure constructed on the proposed sites, particularly large distribution and warehouse units, would have an unacceptable height and scale, be imposing on nearby residential units and prominent within its rural landscape context, particularly given the elevated topography and openness of the land. The proposals would be visually intrusive on the local landscape, harmful to its character and qualities.

Heritage

Harmful impact on the setting of various listed buildings and Scheduled Monuments in proximity, in particular the setting of Howbury Hall and its surrounding parkland.

The landscape surrounding Howbury Hall has changed noticeably over time with the introduction of the A421 dual carriageway to the south. The proposed allocation would further change this landscape, resulting in an urbanised, infrastructure dominated environment that is totally out of context with the historic landscape surrounding Howbury Hall, failing to make a positive contribution to local character and distinctiveness. Furthermore, this radical, irreversible change in historic and rural landscape would not conserve or enhance the historic environment, as required by the NPPF 2021.

Furthermore, the sites have the potential to contain archaeological remains of national importance/significance.

Transport/highways

Significant engineering and modification works will be required to the A4280 St Neots Road, the A421 slip roads, Water End and the link road between the two roundabouts and relevant access points. This would result in the urbanisation of this part of the Parish, which is characterised by agricultural fields, waterways and lakes to the south; and limited built form – primarily in the form of modest houses and scattered agricultural buildings.

The local highway network is already exhausted and at capacity – the proposed allocation would result in a significant increase in traffic movements and associated pollution, detrimental to the local area, in particular the Parish of Renhold and the adjoining rural road network.

Water End road is restricted to access for cars and motorbikes between the peak hours of 7.00 to 9.30am and 3.30 to 6.30pm primarily to restrict the volume of traffic using the village as a “rat-run” to and from the A421 bypass. There is also major congestion at peak times around Renhold Primary School and the Church-

The proposed associated roadside service and EV charging facilities would attract additional transiting traffic that is not associated with the proposed employment use of the land, resulting in an even greater level of pollution (noise, emission/air, light, water).

Technology advances and changes to industry/Pandemic

In recent years technology has evolved, along with working habits, the recent global pandemic has accelerated this change to a lifestyle now where people work from home, commuting is a thing of the past. Work/life balance is now built into employers considerations so the need for employment space has significantly shifted with a noticeable decrease in employees accessing a place of work.

Need/demand

Direct competition with the proposed new settlement and related employment provision at Little Barford, which is only 7 miles/11km to the north-east of the allocation sites.

In November 2020, there were 68,916 sqm of office units and 90,760 sqm of industrial units available in the Borough. Instead of allocating more 'strategic road network' employment sites, the Council should focus on managing and encouraging the development of the 3 already allocated sites, land at Medbury Farm (AD11, land west of B530 (AD17) and Bedford River Valley Park (AD23), totalling 72 ha, where development has not yet started. This would assist in meeting part of the identified additional B-class employment land between 118 and 142 ha.

Whilst the draft allocated sites may be in proximity to a junction with the A421, they currently have no direct access to it, nor do they meet the Council's requirement of being in a location with good access to existing or planned rail stations (para 10.22 of the Employment Land Study May 2022). The nearest railway station is over 4miles from the proposed allocation.

Para 10.23 of this study clearly identifies two sites:

"Sites at Broadmead and Kempston Hardwick offer an opportunity to provide a location with particular potential for an innovation hub and business / science campus primarily focussed on innovation, research, development and education in conjunction with significant residential growth centred on a proposed new station as part of East-West Rail in the Stewartby / Kempston Hardwick area."

No other new sites are recommended in this study.

The EHH (England's Economic Heartlands, where Bedford is located within) strategy sets out to focus on decarbonisation of the transport system by harnessing innovation and supporting solutions which create green economic opportunities; and promote investment in digital infrastructure as a means of improving connectivity, in order to reduce the need to travel. These proposals contradict this strategy and fail to:

- Support the delivery of low carbon transport by working towards reduced congestion, digital connectivity, and a net zero carbon system by around 204017 to 204019
- Promote connectivity and accessibility in new development, and link new and existing communities
- Support opportunities for active travel and green infrastructure
- Promote and support infrastructure development which reflects the ambitions of the three preceding principles.

Government focus

There remains great uncertainty over the Oxford to Cambridge Arc as a government infrastructure project as the government focus has shifted to Levelling Up.

Sustainability

Anything from electric charging points, solar panels or enhancement of the cycle and pedestrian routes could be included.

The sites are not in sustainable locations with lack of footway and cycleway provision and infrequent public transport connection with lack of bus stops. Alternative modes of transport, including walking, cycling and public transport, should be promoted, however, the sites' access would be clearly dominated by vehicles due to their proximity to the A421, therefore failing to meet the key, high-level objective of the NPPF of 'achieving sustainable development'.

Brownfield sites should be considered first before proposing development on greenfield sites. Previously developed land in or immediately adjoining the urban area of Bedford should be utilised in the first instance, with the opportunity to adapt against climate change, rather than encroaching into the open countryside.

In November 2020, there were 68,916 sqm of office units and 90,760 sqm of industrial units available in the Borough. Instead of allocating more 'strategic road network' employment sites, the Council should focus on managing and encouraging the development of the 3 already allocated sites, land at Medbury Farm (AD11, land west of B530 (AD17) and Bedford River Valley Park (AD23), totalling 72 ha, where development has not yet started. This would assist in meeting part of the identified additional B-class employment land between 118 and 142 ha.

Recreational past times

Renhold is incredibly lucky to have a wonderful range of footpaths and bridleways and quiet country roads within the parish; with some great recreational pastimes available that are very popular with cyclists, walkers, bird watchers and horse riders. A wide range of people from Renhold community, use them to enjoy the tranquillity, the wildlife, the views or just to get exercise and for mental well-being. There are several miles of footpaths and bridleways within the parish. The use and enjoyment of rights of way would be detrimentally impacted with the proposed EMP6 allocation, which would not only impact on the nearby residents in Top End, Green End and Water End, but those further afield in Cranbourne Gardens and beyond in Great Barford.

Pollution (e.g. noise, air, light, water)

The proposed associated roadside service and EV charging facilities would attract additional transiting traffic that is not associated with the proposed employment use of the land, resulting in an even greater level of pollution (noise, emission/air, light, water), advancing the already high-level of anticipated pollution, generated by the proposed employment uses.

There are many nationally recognised studies that exist on the negative effects of air pollution on health and well-being. It is important to not forget when there is talk of EVs and hydrogen-powered vehicles that green cars produce harmful pollutants via their tyres and brakes and that these pollutants might be as bad, if not worse than those that come out of tailpipes. In light of the concerns expressed above regarding EMP6 and the resulting gridlock on the feeder roads to the by-pass and slip roads off, idling or slow-moving cars will bring an amplified impact at home time when cold starting exacerbates polluting effects.

Wildlife and habitats

Loss of wildlife, habitat, the wider ecological network, and valuable landscaping (trees and hedgerows), failing to conserve and enhance the natural environment, as required by the NPPF 2021. More specific information is provided in Section 5.

Limited site information submitted

The limited information combined with the Call for Sites for both Sites 761 and 764 having what little detail there is, also be totally not aligned in any way whatsoever with the proposed policy word used by Bedford Borough Council has been very challenging and frustrating. As mentioned previously, for consultation to be effective it needs to be fully understood by all stakeholders what it is actually being proposed. With no relevant site specific information available that in any way correlates to the proposed future use of the sites, it has made it very difficult to comment.

The EMP6 policy states 'approximately 30 hectares' yet the individual site assessments for Site 761 and 764 state some 44 hectares, which is quite a considerable discrepancy.

The draft Plan also makes no reference to the allocated area for employment use within each of the two proposed sites, such loose wording means there is no clear even initial understanding of how the two sites will correlate. Whether one is to be more densely populated than the other for example. Without knowing if the two sites will be required to be developed in tandem, or as stand alone sites, it is again impossible to fully understand what is being proposed.

Viability

In light of the discrepancies above, which concern the Parish Council as it could mean the 30 hectares of research style campus and potentially the difference between that area and the area offered of 44 hectares that 14 hectares is then used for warehousing or distribution.

The Parish Council have seen on multiple occasions in recent years and over time the strategies used within the local planning system in regards to planning gain to enable more profit from a site. If the precedent is lost with the allocation then there would be further concerns about whether the site is viable with a designation for approximate 30 hectares of employment, especially if the limited site information illustrates 44 hectares. If the site were to be allocated then it is a worry that were this site to come forward that the promoter could site reasons relating to viability, which result in a much higher proportion of the site capacity being put forward.

Through the local planning process viability can be sited as a reason as to why the site can not be delivered. It is a concern therefore that more employment capacity on the site(s) would be proposed to the local authority than allocated, or the local authority risk potentially facing the loss of a large allocation which if not delivered would mean the authority falling behind with their strategic employment growth being delivered.

It is also important to recognise that unlike some other forms of employment development, research and science park employment require a very specific high quality, resource heavy type buildings. To deliver this over such vast sites which are not adjacent nor abut one another is ambitious. Current employment sites in situ along the A421 and A6 transport corridor are in general for warehousing, distribution and offices.

The core of the successful Cambridge Science Park extends to about 60 hectares and took some 40 years from concept to substantial completion. The Borough Council has designated 30 hectares and plans it will be completed in 18 years. In light of the worldwide reputation that Cambridge has for this type of industry interested parties looking for employment sites are likely to gravitate towards Cambridge, with its leading University and embedded infrastructure to meet the specific needs of this industry.

In addition, there is also the concern if there was an allocation on the Policy EMP 6 site it would be a precedent for a housing development on some or all of the site(s).

These items identified above leave the site(s) vulnerable over time.

Conclusion

The comprehensive evidence outlined in this section shows that Policy EMP6 is incompatible with the draft Local Plan 2040.

In the main draft Local Plan 2040 consultation document on Page 111, **Policy DM8 New employment development in the countryside** states that “New office, industrial, warehousing and sui-generis business uses such as builders’ yards will be supported in the countryside in the following circumstances:”. The Policy continues to list five circumstances where such development would be supported:

- i. Where it is within an existing employment area; or*
- ii. Where it reuses land last used for office, industrial, warehousing or sui generis uses or reuses existing buildings; or*
- iii. Where it enables the expansion of an established business within its existing operational site; or*
- iv. Where it enables the development and diversification of agricultural and other land- based rural businesses; or*
- v. Where it enables the limited enlargement of an existing employment area.*

The site EMP6 fails on all of the above statements.

The Policy DM8 then goes on to list a further five conditions which ‘*In all instances applicants will be required to demonstrate all of the following:*’.

- vi. If a new building is proposed, there are no existing buildings that could be used for the proposed use;*
- vii. Open storage is ancillary to employment buildings and is located in well-contained and screened areas of the site with an appropriate height restriction;*
- viii. The proposal would not generate traffic movement and volume that would lead to unacceptable environmental impacts or detriment to highway safety objectives;*
- ix. The proposal would not have a significant adverse effect on the established character of the area and the local amenities and adjoining land uses and accords with Policy 41S;*
- x. There would be no adverse impact on biodiversity including national site network (formerly Natura 2000) sites in accordance with Policy 42S*

Again, the Policy EMP6 fails in regards to Policy DM8, which need ALL of the above to be satisfied in ALL instances.

In the draft Local Plan 2040 subsidiary planning policy **Reference Document 9- Development Strategy and Site Selection Topic Paper** in Paragraph 5.18 on Page 69 it references non-urban employment sites and criteria for assessing such sites, among which is ‘*..their compatibility with neighbouring uses...*’.

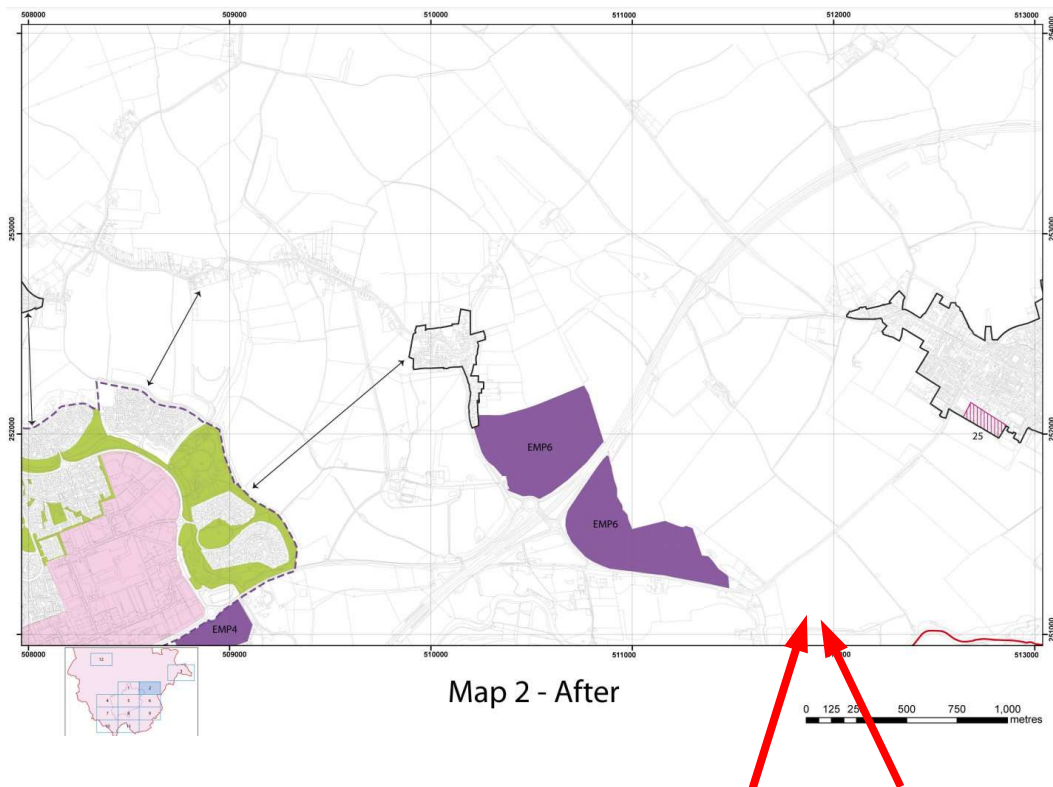
The Policy EM6 fails to meet the Policy DM8 New employment development in the countryside planning policy criteria.

SECTION 4: COALESCENCE

The Parish Council cannot reiterate too strongly how this aspect of the Local Plan with the proposed allocation within Renhold and the close proximity brings an increased worry over the rural village being attached to the much larger and Key Rural Service Centre, Great Barford.

There really needs to be a distinct gap between Great Barford which has grown significantly in recently years through noticeable housing growth that has crept down Bedford Road towards St Neots Road and Water End in Renhold. In light of this now significant proposed Policy EMP6 Business Park, Land at Water End and St Neots Road, with one of the two sites being located so close to the part of the parish boundary with Great Barford it appears there is no safeguarding of the distinctive character of Water End. There is no specific reference within the policy wording to take this into account on how to protect Water End and/or to prevent “coalescence” with Great Barford. This omission means there has been no attempt to preserve the two separate and very different rural identities and the sites’ assessments have clearly not taken this point into account.

Reference 52 Changes to Policies Maps show maps produced by the local authority to illustrate the before and after images of the draft Local Plan 2040. When studying the section of the document which is relevant to EMP6, Map 2, below, as shown by the red arrows, omits from showing the growth in that area from Great Barford. The lack of a suitable map to illustrate the growth of Great Barford within the Local Plan 2030 document which allocated growth of 500 houses to be determined through Great Barford’s Neighbourhood Plan process means there is no realistic context to show how close the EMP6 site is to the settlement area of Great Barford as it grows down St Neots Road as the mapping does not include both EMP6 and the relevant parts to the west of Great Barford.



It is stressed again that Renhold Parish has consisted historically of separate “Ends” with Water End, Green End, Top End, Church End, Salph End and Struttle End. Renhold is a linear village

spread out around the rural road network. It is important to appreciate the unique 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. Placing an enormous employment site in two of those “Ends” at Water End and Green End would not maintain that unique character and would be totally alien and out of context and proportion with the modest built form in the adjoining ends and the rural ‘end’ character of Renhold overall. These Ends should remain separate to preserve their history, character and appearance within the north Bedfordshire countryside. To see in the consultation such a lack of robust detail or any adequate justification on how such a sensitive issue might be managed, makes rural communities feel totally uncared for.

The Parish Council feel what has happened along the A421 at Marston, Wootton and Cranfield are a good example to illustrate the concerns the Renhold community have in regards to coalescence.

SECTION 5: WILDLIFE AND HABITAT**Introduction**

This section comprises an assessment of the birdlife that would be impacted by Policy EMP6 Business Park, Land at Water End and St Neots Road. It contains the following material:

- a) Description of the habitats affected
- b) Data sources
- c) Breeding birds
- d) Wintering birds
- e) The impact of Policy EMP6 Business Park, Land at Water End and St Neots Road
- f) Conclusions

The material was compiled by Tony Ploszajski, a former Records and Research Officer for the Bedfordshire Bird Club, who has lived in Renhold since 2010, has extensive (local) bird and wildlife knowledge and more than 30-years' birdwatching experience in the county and beyond.

General context

The '*Bedford Borough Landscape Character Assessment*' (2013) 'provides a comprehensive landscape evidence base to help underpin planning and management decisions in the Borough'. It includes a section on the 'Renhold Clay Farmland' which covers Renhold parish. The headline findings are as follows:

Landscape Strategy: 'To enhance the elements of the landscape that are in declining condition or detract from the rural character, in particular the hedgerows and hedgerow field trees and the north-east edge of Bedford. At the same time conserving and enhancing the open rural landscape with its scattered small-scale settlements and farmsteads and historic earthworks, ancient woodlands and grasslands of high biodiversity value. Seek to create landscape connections into adjacent green infrastructure opportunity areas and proposals such as the Bedford River Valley Park associated with the adjacent Ouse Valley.'

Landscape management: Measures include:

- 'Conserve the character of the rural roads and limit urbanising influences and ensure that traffic management measures are sympathetic to the rural character'.
- 'Enhance the hedgerows consistent management and resist development that will result in further loss/fragmentation of hedgerows or hedgerow trees'.
- 'Conserve tree-lined brooks and associated riparian features'.

Development guidelines: These are:

- 'Conserve the scattered farmsteads and historic villages with their pattern of dispersed 'Ends' and the views to the stone churches'.
- 'Retain the individual settlements avoiding merging these through linear development particularly immediately to the north of Bedford for instance along the roads between the various 'ends' of Renhold'.
- 'Consider planting new woodlands to screen the urban boundary of north east Bedford in views from the open countryside to the north. Where possible this should also create landscape links into adjacent green infrastructure initiatives and mitigation projects such as the Bedford River Valley Park'.

The main habitat affected:

- a) Farmland comprising arable and sheep fields, with mature hedgerows.

Sources of data

Two main sources of data were assessed:

- Bird sightings compiled on a year-round basis by Tony Ploszajski in the period 2010-2021.
- A breeding bird survey conducted by Tony Ploszajski in April-May 2021 in the local area.

The 'status' of the species noted is based upon their conservation importance as defined by the 'Birds of Conservation Concern' classifications recognised by Natural England.

- a) **'Red List' species:** These are defined as:

- The species is globally threatened.
- Historical population decline in UK during 1800-1995.
- Severe (at least 50%) decline in UK breeding population over last 25 years.
- Severe (at least 50%) contraction of UK breeding range over last 25 years.

- b) **'Amber List' species:** These are subject to at least one of the following:

- Species with unfavourable conservation status in Europe.
- Historical population decline during 1800–1995 but recovering; population size has more than doubled over last 25 years.
- Moderate (25-50%) decline in UK breeding population over last 25 years.
- Moderate (25-50%) contraction of UK breeding range over last 25 years.
- Moderate (25-50%) decline in UK non-breeding population over last 25 years.
- Rare breeder, 1-300 breeding pairs in UK.
- Rare non-breeders, less than 900 individuals.
- Localised, at least 50% of UK breeding or non-breeding population in ten or fewer sites.
- Internationally important, at least 20% of European breeding or non-breeding population in UK.

- c) **'Green List' species:** Species on the green list are the least critical group, that occur regularly in the UK but do not qualify under any or the above criteria.

Breeding birds

Farmland: The following species are dependent upon the fields and hedgerows to nest and feed:

| <i>Species</i> | <i>Pairs</i> | <i>Status</i> |
|----------------|--------------|---------------|
| Corn Bunting | 3 | Red |
| Skylark | 14 | Red |
| Yellowhammer | 4 | Red |
| Linnet | 6 | Red |
| Barn Owl | 1 | Green |
| House Sparrow | 12 | Red |
| Bullfinch | 4 | Amber |
| Kestrel | 1 | Amber |
| Lapwing | 2 | Red |

Ancient woodland: The following species are dependent upon the woodland to nest and feed:

| <i>Species</i> | <i>Pairs</i> | <i>Status</i> |
|--------------------------|--------------|---------------|
| Marsh Tit | 1 | Red |
| Great Spotted Woodpecker | 3 | Green |
| Nuthatch | 3 | Green |
| Treecreeper | 4 | Green |
| Great Tit | 6 | Green |
| Blue Tit | 9 | Green |
| Red Kite | 1 | Green |
| Buzzard | 1 | Green |
| Dunnock | 5 | Amber |
| Tawny Owl | 1 | Amber |
| Goldcrest | 2 | Green |
| Chaffinch | 2 | Green |
| Greenfinch | 2 | Green |
| Stock Dove | 1 | Amber |
| Wren | 4 | Green |
| Song Thrush | 3 | Red |
| Jay | 1 | Green |
| Carrion Crow | 4 | Green |
| Blackbird | 6 | Green |

Wintering birds

Farmland: The following species are dependent upon the fields and hedgerows for food and shelter in the winter months:

| <i>Species</i> | <i>Maximum Count</i> | <i>Status</i> |
|----------------|----------------------|---------------|
| Corn Bunting | 6 | Red |
| Skylark | 24 | Red |
| Yellowhammer | 23 | Red |
| Linnet | 56 | Red |
| Barn Owl | 6 | Green |
| House Sparrow | 44 | Red |

| | | |
|--------------|----|-------|
| Bullfinch | 6 | Amber |
| Kestrel | 3 | Green |
| Reed Bunting | 5 | Amber |
| Fieldfare | 51 | Red |
| Redwing | 32 | Red |
| Carrion Crow | 39 | Green |
| Rook | 71 | Green |
| Jackdaw | 43 | Green |

The impact of Policy EMP6 Business Park, Land at Water End and St Neots Road

The proposed science park will have the following impact on the bird species and the habitats upon which they depend:

Habitat degradation: The proposed development will degrade an enormous expanse of the existing habitat by reducing the available area, segmenting breeding territories and foraging areas.

Disturbance: The noise and disruption during the construction phase will displace birds from their current breeding and foraging areas into less suitable areas that will be unable to sustain the same numbers. Once the science park is operational, the ongoing noise and activity will continue to disrupt the local birdlife. Species like Barn Owls that largely hunt by sound will be unable to hear their prey and will be unable to survive as a result.

Conclusions

The area in and around the proposed allocation in Renhold parish currently sustains important populations of nine 'Red List' bird species of conservation concern and a further six 'Amber List' species.

The destruction and degradation of habitat would have a severely detrimental effect on the ability of all the species concerned to maintain their current numbers and given the fragile state of their respective populations, it will hasten the demise of birds that are already heavily threatened.

The landscape impact is totally contrary to the provisions of the '*Bedford Borough Landscape Character Assessment*' (2013; updated October 2020 to form part of the Local Plan evidence/supporting documents).

With regards to biodiversity and protected species, the Council's answers to Qs 2b and 2c on both site assessments clearly state "*uncertain or insufficient information*". This is crucial information that need to be provided upfront to ensure no harm is caused to wildlife, protected species or habitat; and as such the draft allocation of these sites should have not progressed to be included into the draft Plan.

SECTION 6: HISTORIC BUILDINGS AND HERITAGE ASSETS

It is important to recognise, as detailed in the Historic Environment Record for Bedfordshire and the Heritage Gateway (www.heritagegateway.org.uk), it lists almost 200 historic sites and buildings within the parish of Renhold. They include;

- 39 Listed buildings (The National Heritage List for England, www.historicengland.org.uk).
- 135 known archaeological sites ranging from the Neolithic period to the Second World War- there may be others as yet unknown.
- 18 previously investigated archaeological sites (National Monuments Record Excavation Index).
- 3 Scheduled Monuments (www.historicengland.org.uk).

Also, to understand that the Bedfordshire Archives hold roughly 2,000 documents which include Renhold as the subject.

The Local Plan references on Page 80 within the policy detail of the proposed site Policy EMP6 Business Park, Land at Water End and St Neots Road, the following heritage assets:

- Scheduled monument of Howbury ringwork and Medieval Trackway
- Grade II listed Great Dairy Farmhouse
- Grade II listed Hill Farmhouse
- Grade II listed 52 Green End
- Grade II listed Howbury Hall and associated heritage assets

It is a significant, but not exhaustive list of important local historic assets and heritage assets in relation to the site. That in itself clearly demonstrates as evidence of how damaging and detrimental such a sizeable employment allocation will be on such a high number of nearby assets. There is no other site allocation in the Local Plan 2040 consultation which lists such an extensive list.

With such rich evidence of so many historically recognised assets in close proximity to EMP6 but in particular with a scheduled monument being adjacent/so close to the proposed site boundary, it is reasonable that these, and their respective settings, are afforded the highest level of protection and preservation, including both buried archaeological assets and standing assets, that it will result in irreplaceable damage to the asset setting.

SECTION 7: RENHOLD NEIGHBOURHOOD PLAN

Work on the Renhold Neighbourhood Plan has continued on this despite the many challenges thrown in by an unexpected global pandemic. Whilst we are still working on the evidence-base for employment and business needs in the parish, the emerging requirements are for micro-scale provision and there has certainly been no identified need for a 30 hectare research campus. It is therefore difficult to understand how a proposed employment site allocation within the emerging Local Plan will sit alongside the emerging policies in our Neighbourhood Plan. We appreciate that the Neighbourhood Plan must comply with Local Plan policies, but are struggling to reconcile this with the results of our community consultation outcomes that provide a contradictory evidence base on local employment needs.

Renhold Neighbourhood Plan Working Group continues with progressing a strategy that meets the needs of the village as identified through the various consultations and engagement with residents.

SECTION 8: OTHER ASSOCIATED PLANNING POLICIES

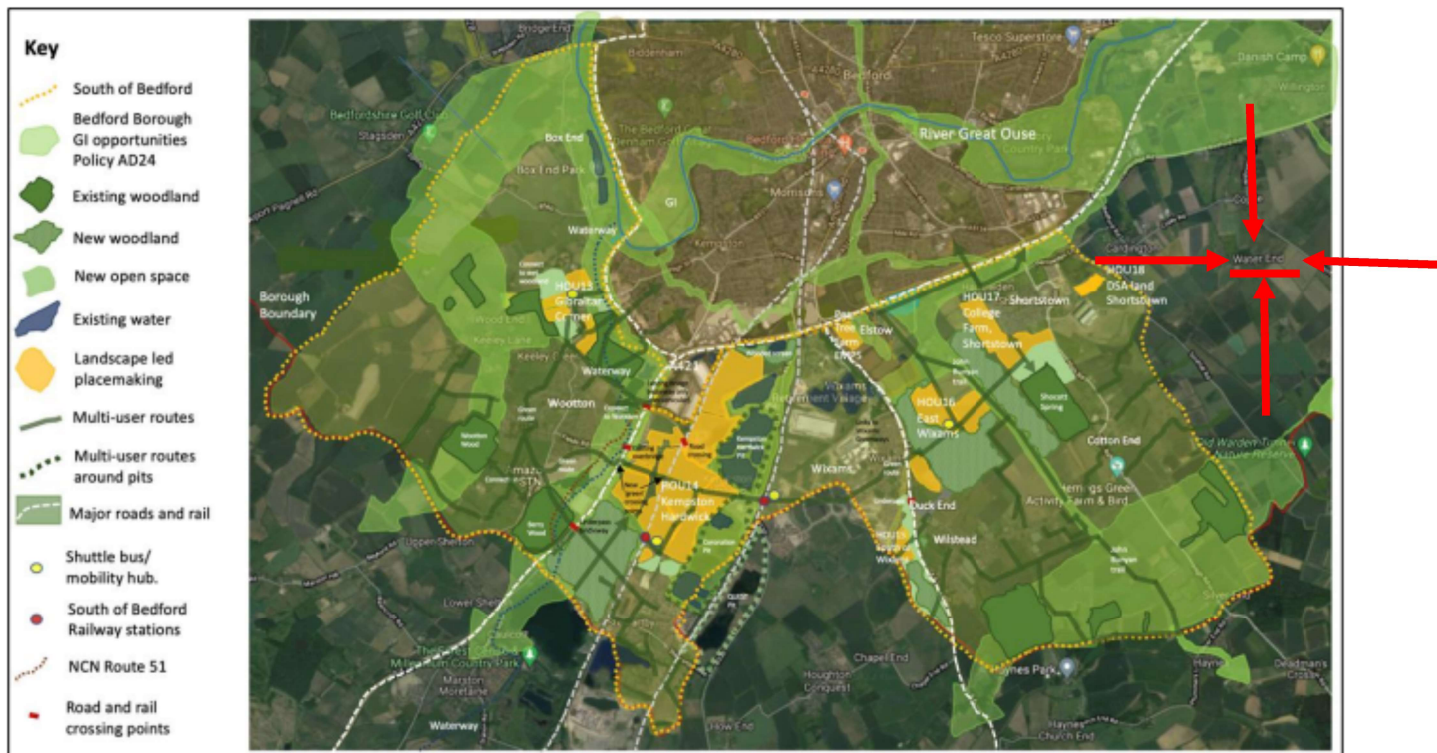
With the limited resources, the Parish Council have, where able, there has been a review of some of the subsidiary planning policy documents. It is important to reiterate that with limited technical skills and expertise in the many areas covered by these documents it is possible that there are more concerns which have not yet been identified.

For now, in summary please see below comments on some of these policy documents.

Policy Document 10 – South of Bedford Area Topic Paper

The main draft Local Plan consultation document makes several references to the new planning policy relating to the South of Bedford Area. Reference document 10 has been produced to sit alongside the main plan. Whilst Renhold geographical position means it is not within the Marston Vale which is the criteria for this new policy area. The Parish Council would like to make the following observation on the document and in particular to a map, which again evidences the confusing and misleading information presented on proposed site locations.

Figure 5: South of Bedford area



The Figure 5 Diagram, known as South of Bedford area on Page 55 in the consultation sets out the identified strategic area, with the subsidiary document then setting out more in-depth policy aspirations. The presented map includes a reference to Water End, as illustrated by the red arrow(s) and line, above which in fact show Water End in the nearby parish of Cople. This is a further example of misleading information being presented which leads to confusion for stakeholders.

Policy Document 14 Housing and Employment Land Availability Assessment and Site Assessments

This subsidiary planning policy document includes a simple question and answer assessment for each of the sites under consideration to indicate their compatibility with Bedford Borough Council policies. In regards to Policy EM6 which are references as Sites 761 and 764 detailed on Pages 462, 463, 466 and 467 the Parish Council would like to draw attention to some of the responses.

Question 1. a) relating to Site 761 has a question mark over the reply that the site 'Within or adjoining UAB SPA or built form of a small settlement'. The Parish Council have identified clear evidence that that it is not within the boundaries of any Settlement Policy Area and abutting a very small SPA for a few metres is not a reasonable justification for '*approximately 30 hectares of employment use*'.

Question 8. a) relating to both Site 761 and 764 also has a question mark over the reply that the site(s) '*Likely to have a significant adverse impact on the surrounding landscape?*'. The site assessments for both Site 761 and 764 state '*? It is uncertain what effect the proposal is likely to have on the landscape / more information is required.*'. The Parish Council have identified clear evidence that the impact on the surrounding landscape will be detrimental.

SECTION 10: MITIGATION MEASURES

The purpose of this section is to outline the Parish Council's comments, having engaged with parishioners, to understand what mitigation measures would in their opinion be needed. The Parish Council would like to reiterate that these comments are being made without prejudice in terms of Policy EMP6 Business Park, Land at Water End and St Neots Road, and should not be taken that the Parish Council support the proposed employment allocation but are following feedback from residents:

1. Ensure that Renhold PC takes an active role and is fully engaged and identified as a key stakeholder in the preparation of the Masterplan.
2. Traffic management must be robust and measured given the ongoing issues Renhold has with speeding and volume of traffic
3. Environmental considerations include tree/hedgerow planting; creation of wildlife opportunities
4. Sensitive lighting that recognises Renhold's dark sky policy
5. Sensitive operational hours of work recognising the needs of the local community
6. Community assets created such as allotments, children's facilities, leisure, cycle paths, safe footpaths, safe access to the site
7. Noise control recognising the needs of local residents
8. Enhancement of PROW and bridleway network
9. The Ring Work remains are just across from the St Neots Road site in EMP6, so thorough trench surveys must be carried out.

Given that the sites' developments are meant to be in a landscaped setting/environment, a significant proportion of the sites should therefore be identified for meaningful landscaping and enhanced opportunities for biodiversity net gain (beyond the minimum requirement of 10%).

The Parish Council expect robust planning policy wording to be applied to safeguard Renhold and to ensure that all mitigation measures are fully adhered to from the early stages of development. The policy must protect Renhold so there is not a repeat of the experience in Wixams where the community were promised so many facilities which have been constantly delayed or never materialised.

SECTION 11: CONCLUSION

Throughout this document the Parish Council have wished to highlight areas they feel are of importance which need to be taken into consideration at the next stages of the plan-preparation as well as any examination.

Based on the arguments presented throughout this document, it is concluded that the draft Local Plan 2040 is unsound, failing to comply with bullet points a) to e) of NPPF para 16, paras 8, 9, 10 and 11.

Furthermore, the proposed allocation is not considered a sustainable form of development and is not supported by Renhold PC as it:

- would be out of keeping with the rural, open countryside setting of the locality;
- be out of proportion with the size and established character of the Parish;
- would encroach into the open countryside which should be protected from inappropriate development;
- would result in unacceptable harm to local wildlife, habitats and heritage assets;
- would result in the loss of BMV agricultural land and valuable existing landscaping;
- would result in an unacceptable level of traffic and pollution associated with the proposals;
- would have a detrimental impact on the amenity of neighbouring residential properties.