

## **BEDFORD BOROUGH LOCAL PLAN 2040 CONSULTATION**

### **LOCAL PLAN HEARING STATEMENT from RENHOLD PARISH COUNCIL August 2023**

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**Hearing Day: Wednesday 20<sup>th</sup> September (Week 3)**

**Morning Matter 13** Other Borough wide development management policies

Matter Issue - Whether the other Borough wide development management policies are justified, effective and consistent with national policy.

#### **DM8 - New employment development in the countryside**

Main Matter Issue Response - The Parish Council would like to raise that by having a Local Plan policy that enables new employment development in the countryside it places small, rural communities at risk of receiving out of keeping development. Not just in terms of site size, or volume of units, but it being a mechanism where unsuitable industries can locate themselves in environments which are not suitable for the profession.

It is really important there is sensitivity around rural employment development, when such sites are reliant on a limited rural highways network, plus often adjacent to or in very close proximity to local historic properties and sensitive environmental landscapes.

The Parish Council understand and appreciate that diversification is needed in some circumstances to enable village and rural employment opportunities to be viable and accessible. However, it is very important that sites nestled in village locations which are often available at a more economically pleasing rate, are not exposed and used as a way for unsuitable employment coming to rural communities.

Renhold Parish Council has already presented during Matter 7 relating to the EMP 6 hearing session to set out the concerns of a local community when a significantly large employment allocation is being imposed on a rural community. The Parish Council would like to reiterate at this stage of the hearing sessions again that having isolated listed buildings in Green End, Renhold dwarfed by sizeable industrial structures is not agreeable. Alongside the route into rural Renhold from Water End as well coming from the bypass going from welcoming grazing land in the countryside to now being visually decimated by a landscape of buildings for an industry not evidenced as being abundantly needed in Bedford.

The Parish Council also wish to stress that policy wording becomes more important and influential in a document such as the Local Plan 2040 as a planning strategy framework document which is why it is imperative that Policy DM8 is clear and focused. It is needed to be so, to safeguard rural communities like Renhold, so that if such sites are taken forwards to development management level then the Planning Officer at the local authority will have little room for individual interpretation. It cannot be stressed enough the importance of robust planning policy wording being needed at all levels within this Local Plan document to prevent local communities like ours receiving employment development in countryside as such ambiguity makes those communities even more vulnerable.

The Parish Council have already provided to this inspection comprehensive evidence outlined previously that shows Policy EMP6 is incompatible with the draft Local Plan 2040 based on the Policy DM8 document.

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

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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.**

Other Matter Issue Response - During this inspection there has also been information presented in relation to the EMP site at Roxton, which is a clear example of the unpredictability which there is with everything related to the East West Rail project. The volatile deliverability of East West Rail alongside the original employment allocations has already led to the acknowledgement by the local authority during Matter 7 that the employment site allocations would need to be revisited in light of the East West Rail associated path selected at Roxton.

It has been mentioned at several points by a range of representatives that the outlook of the local authority has been short sighted by narrowly looking only at the east to west highways and associated infrastructure to support growth in Bedford up to and including 2040. By automatically excluding the north of Bedford for any growth, this brings a number of potential barriers that will unravel as the East West Rail statutory consultation commences in the first half

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of 2024. It should not be underestimated the imposition of the national government infrastructure project which will take precedent as it takes its route exactly where it is deemed in the interests of national funding to be most suitable.

For example, the construction paths which will be needed in and around the area local to Renhold which sits right in the path of the preferred final East West Rail route will bring havoc to the local rural road network of unclassified roads. This combined with EMP6 which it has already been established is reliant on an investment of a highways junction improvement at the A421 bypass costing in the region at a conservative estimate of £5million, that no one is able to identify who will pay for, yet which is pivotal to the delivery of the site. Such junction redesigning during a period of the associated East West Rail construction works that will be needed in Ravensden, Wilden, and Great Barford who are all only able to gain access from their local communities by travelling through Renhold parish because of the geography of the local network, is going to cause enormous issues on rural roads that already struggle with volume and speeding. There needs to be more joined up thinking and planning in advance included within the Local Plan 2040 otherwise it will simply be undeliverable.

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#### **Hearing Day: Thursday 21<sup>st</sup> September (Week 3) Morning Matter 15 Monitoring and delivery**

Matter Issue - Whether the approach to delivery and monitoring is justified, effective and consistent with national policy.

1. How has viability been taken into account? Is there a proportionate assessment of plan viability? Is it sufficiently flexible?
2. At an overall plan level, have all the infrastructure needs been identified, along with appropriate consideration of associated delivery risks and the mechanisms that will be used for delivery?
3. How will the plan be monitored? Will monitoring be effective? Are the implications for the plan if key infrastructure dependencies don't align understood and reasonably managed?
4. What is the intended approach to reviewing the plan? Given the uncertainty around strategic infrastructure provision and reliance on development later in the plan period, is early review necessary?

Main Matter Issue Response - In answering the above questions there are a number of overlaps so the Parish Council feel it is more suitable to submit an overarching hearing statement to raise concerns. During Matter 13 the Parish Council made representation on some aspects of their concerns of the Local Plan 2040 being solely reliant on East West Rail deliverability, these are included below again in case reference is needed during Matter 15 to them as well.

There are many delivery risks that have been identified by numerous representations made to this inspection, it is important they are not discounted as these combined with the East West Rail factor do make this Plan volatile.

By identifying the unrealistic deliverability of EMP6 for example as not being ready for 2024 it does worry the Parish Council the knock on effect this has on the employment land figures if it appears the local authority are not meeting their targeted levels so early on in the lifetime of the Plan. This presents immediate opportunity for challenge to the local authority from developers who can rightly so argue the Borough Council have fallen behind on delivery and then sites come forward in piecemeal fashion based on who is brave enough to challenge or has deep lined pockets to do so, which will not ultimately result in the best outcome for the Borough and its communities. This has been an issue at Central Bedfordshire Council which as a neighbouring local authority mean it is something local site owners and agents are familiar with following up.

It is also important to reiterate that as has been detailed during this inspection at many stages, Bedford Borough Council have a history of strategically allocated employment sites not coming forward for development simply as the need in the locality has been over inflated. As an example, the AD11 Medbury Farm site in Elstow now redressed and reduced having been allocated well over a decade ago.

This is also further exemplified with a railway related issue which has been a well known local issue at Wixams, which like the proposed large housing allocation at Kempston Hardwick relied in a railway station as part of the site deliverability and appeal to new residents moving to the new development. Wixams train station was delayed by so many years even when it was to service an existing established route line. Kempston Hardwick would be awaiting and reliant on an East West Rail service which is dependent on so many factors outside of the developer and

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local authority control that it is highly likely housing delivery numbers will also be adversely affected in the short, medium and long term at this location.

Renhold Parish Council have also highlighted that there are other areas of over ambition relating to the deliverability of site EMP6. A reminder that the core of the successful Cambridge Science Park in Cambridge extends to about 60 hectares and took some 40 years from concept to substantial completion. The Borough Council has designated 30 hectares in Renhold 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. Renhold and in fact nor does Bedford have such a worldwide reputation in this specific type of industry so again it brings concern from the Parish Council that this Local Plan is over optimistic. Therefore it is asked that the Local Plan 204 monitoring is rigours, and occurs regularly to safeguard opportunistic challenges which does impact significantly on the local community that find themselves unfortunately targeted.

Matter 13 Renhold Parish Council submission extract copied:

*During this inspection there has also been information presented in relation to the EMP site at Roxton, which is a clear example of the unpredictability of everything relating to East West Rail. The volatile deliverability of East West Rail alongside the original employment allocations has already led to the acknowledgement by the local authority that the employment site allocations would need to be revisited in light of the East West Rail associated challenge with the EMP site in Roxton EMP 8.*

*It has been mentioned at several points by a range of representatives that the outlook of the local authority has been short sighted by narrowly looking only at the east to west highways and associated infrastructure to support growth in Bedford up to and including 2040. By automatically excluding the north of Bedford for any growth, this brings a number of potential barriers that will unravel as the East West Rail statutory consultation commences in the first half of 2024. It should not be underestimated the imposition of the national government infrastructure project which will take precedent as it takes its route exactly where it is deemed in the interests of national funding to be most suitable.*

*For example, the construction paths which will be needed in and around the area local to Renhold which sits right in the path of the preferred final East West Rail route will bring havoc to the local rural road network of unclassified roads. This combined with EMP6 which it has already been established is reliant on an investment of a highways junction improvement at the A421 bypass costing in the region of a conservative £5million, that no one is able to identify who will pay for, yet which is pivotal to the delivery of the site. Such junction redesigning during a period of the associated East West Rail construction works that will be needed in Ravensden, Wilden, and Great Barford who are all only able to gain access from their local communities by travelling through Renhold parish because of the geography of the local network.*