



**Renhold Parish Council Consultation Response
Planning Application at Land off Hookhams Lane,
Renhold.**

Planning application 26/00724/MAO.

July 2026



Renhold Parish Council

Renhold Parish Council, PO Box 1548, Bedford MK44 5AX.

<https://renhold-pc.gov.uk/>

Telephone: 01234771702

Email: parishclerk@renhold-pc.gov.uk



Troy Planning + Design

33 Foley Street, Fitzrovia London W1W 7TL

www.troyplanning.com

Telephone: 02070961329 (London)

Email: info@troyplanning.com

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1. Introduction

- 1.1.** These representations provide a response, prepared by Troy Planning + Design (Chartered Town Planners) on behalf of Renhold Parish Council (RPC), to the following planning application being considered by Bedford Borough Council (BBC) and submitted by Manor Oak Homes (the Applicant):
- **26/00724/MAO** Outline application for up to 330 dwellings, open space, drainage, footpath improvements and vehicular access with all matters reserved other than access.
- 1.2.** These representations relate to land located between Hookhams Lane and Ravensden Road, adjacent to Salph End, within Renhold Parish. The application site comprises an area of 21.2 hectares of agricultural land to the north-east of the Bedford urban area, and adjacent to Salph End. The site comprises two large, irregularly shaped agricultural fields, a dwelling and its curtilage at 27 Hookhams Lane, and a small paddock. The boundary of the site is formed by a mix of hedgerows and trees. Importantly, the site is bisected by a tributary of Renhold Brook running broadly north-south through the site and forming the boundary between the two principal fields. The site levels fall towards the watercourse to the south-west, with a level difference of 7 metres between the highest and lowest points.
- 1.3.** The surrounding context includes a wooded area to the north, Ravensden Road and properties fronting that road to the east, properties on Home Close and Hookhams Lane to the south-east, and open land to the south and west, which is home to Mowsbury Golf Course and the grounds of Mark Rutherford Community College.
- 1.4.** There are two public footpaths along the north and south boundaries of the site: Footpaths 11 and 39, and bridleway 9, located within the wider area but forming part of the local public right of way network.
- 1.5.** The land is not an allocated housing site in the adopted development plan and lies outside the defined Settlement Policy Area. The site is also not allocated for housing in the recently made Renhold Parish Neighbourhood Plan. The site is located within an area identified in the Renhold Parish Neighbourhood Plan as an Important Green Gap, where Policy RNP6 seeks to preserve openness, avoid coalescence and protect the undeveloped character of the gap. The application site is shown edged red on the Site Location Plan at Figure 1.



Figure 1. Site location plan.

- 1.6.** Renhold Parish Council supports a genuinely plan-led approach to growth that meets local needs, aligns with the adopted spatial strategy and Neighbourhood Plan, and safeguards settlement character and identity (including gaps in between). In that spirit, this representation sets out the principal planning and community considerations relevant to this site. We encourage BBC, as Local Planning Authority, to address development needs for Renhold through the future new Local Plan process rather than by way of ad hoc proposals on unallocated land, and we would welcome continued engagement with officers and Members should any clarification or further input be helpful.
- 1.7.** For the avoidance of doubt, **RPC objects to the current application 26/00724/MAO.** We nonetheless identify in these representations several fundamental concerns with the proposal and areas where further information or mitigation would be required and offer our assistance to BBC throughout the determination process, including by participating in any further discussions or providing additional evidence as required.

2. Policy framework and planning history

2.1. The policy framework for the site is established in the following plans that form the development plan in the area:

- Bedford Borough Local Plan 2030 (2020)
- Allocations and Designations Local Plan (2013)

2.2. The following **Bedford Borough Local Plan 2030 (BBLP)** policies are relevant:

- Policy 2S – Healthy communities
- Policy 3S – Spatial strategy
- Policy 4S – Amount and distribution of housing development
- Policy 5S – Development in villages with a Settlement Policy Area
- Policy 7S – Development in the countryside
- Policy 28S – Place making
- Policy 29 – Design quality and principles
- Policy 30 – The impact of development – design impacts
- Policy 31 – The impact of development – access impacts
- Policy 32 – The impact of development – disturbance and pollution impacts
- Policy 33 – The impact of development – infrastructure impacts
- Policy 35S – Green Infrastructure
- Policy 37 – Landscape character
- Policy 38 – Landscaping in new development
- Policy 39 – Retention of trees
- Policy 40 – Hedgerows
- Policy 41S - Historic environment and heritage assets
- Policy 42S – Protecting biodiversity and geodiversity
- Policy 43 – Enhancing biodiversity
- Policy 46S – Use of previously developed land and use of undeveloped land
- Policy 49 – Waste
- Policy 51S – Climate change strategic approach
- Policy 52 – Water demand
- Policy 53 – Development layout and accessibility

- Policy 58S - Affordable housing
- Policy 59S - Housing mix
- Policy 86S – Delivering infrastructure
- Policy 87 - Public transport
- Policy 88 - Impact of transport on people, places and environment
- Policy 91 – Access to the countryside
- Policy 92 - Flood risk
- Policy 93 - Sustainable drainage systems (SuDS)

2.3. The following **Allocations and Designations Local Plan (ADLP)** policies are relevant:

- Policy AD1 Sustainable Development Policy
- Policy AD24 Green Infrastructure Opportunity Zones
- Policy AD28 Provision of Open Space and Built Facilities in Association with New Development
- Policy AD36 Pedestrian Routes
- Policy AD39 Cycling
- Policy AD40 Village Open Space
- Policy AD42 Local Gaps
- Policy AD43 Urban Open Spaces and Gaps

2.4. The **Renhold Neighbourhood Plan 2025-2030 (Made Version) (RNP)** was made on 1 May 2026. It has been prepared by Renhold Parish Council and sits alongside the Local Plan, to form the key documents of the development plan in the determination of planning applications. The RNP forms part of the statutory development plan and applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The following RNP policies are relevant to this planning application:

- Policy RNP1: Housing Development
- Policy RNP2: Renhold Design Code
- Policy RNP3: Dark Skies
- Policy RNP4: Green Infrastructure
- Policy RNP5: Local Green Spaces
- Policy RNP6: Important Green Gaps
- Policy RNP7: Heritage Assets

- Policy RNP9: Mitigating Transport Issues

- 2.5. In terms of planning history, the most relevant event was the outline planning application (ref. **19/01974/MAO**), refused by BBC in 2020 for a residential-led development for up to 400 dwellings, land for a new primary school, open space, drainage, footpath improvements and vehicular access. The Council's refusal identified fundamental concerns with the principle of development in this countryside location, including conflict with the Local Plan spatial strategy, harm arising from a large development extending at depth beyond the established pattern of Salph End, contribution to coalescence, harm to the rural setting and character of the area, and unresolved matters relating to archaeology, best and most versatile agricultural land, highways, infrastructure, affordable housing, education, healthcare and open space provision.
- 2.6. The subsequent appeal (ref. **3256134**) was dismissed. Although the Inspector found that some matters had been addressed or were capable of being secured by condition or obligation, the Inspector found that the site lay outside the adopted spatial strategy and was contrary to Policy 7S for development in the countryside. The Inspector ultimately concluded that, notwithstanding some locational merits and potential benefits, there were insufficient material considerations to justify departing from the development plan.
- 2.7. No pre-application engagement has taken place between the Applicant and BBC for this proposal.

3. Principle of development

- 3.1. Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan for this site includes the Bedford Borough Local Plan 2030, the Allocations and Designations Local Plan, and the Renhold Neighbourhood Plan, which was recently made on 1 May 2026 and therefore attracts full statutory weight.
- 3.2. The application site lies outside the defined Settlement Policy Area of Salph End and is not allocated for housing in either the Local Plan or the RNP. It is therefore a countryside site for development-management purposes. The proposal must be assessed against the spatial strategy in Policies 3S and 4S, the countryside Policy 7S, and the locally specific policies of the Neighbourhood Plan, including Policies RNP1, RNP2, RNP4 and RNP6.
- 3.3. The starting point is that the proposal conflicts with the adopted spatial strategy. Policy 3S directs growth to locations identified through the Local Plan strategy, while Policy 4S distributes housing development in accordance with that strategy. The site is not within the Bedford urban area, is not a strategic allocation, is not a

key service centre or rural service centre allocation and is not allocated through the Neighbourhood Plan. The 2020 appeal decision is directly relevant in this respect, as the Inspector found that the previous proposal on the same broad site was contrary to Policy 7S and outside the adopted spatial strategy. Although the Inspector considered that the harm to the strategy was “small” in that appeal context, the appeal was nevertheless dismissed because the proposal did not accord with the development plan as a whole and there were insufficient material considerations to justify a departure.

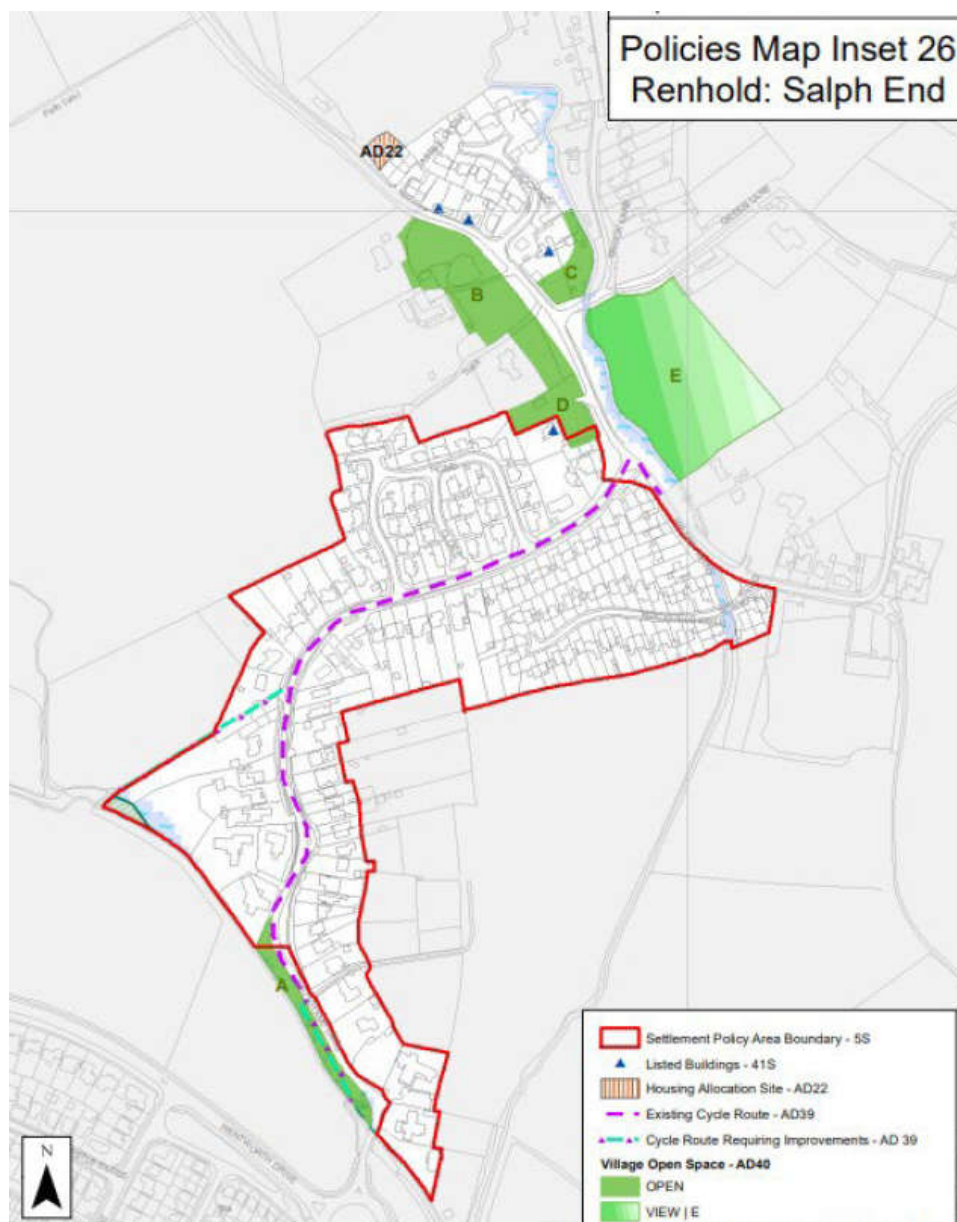


Figure 2: Extract of the Local Plan Policies Map of Renhold (Salph End) and the wider area showing the Settlement Policy Area in red.

- 3.4.** The policy context has since become more, not less, locally restrictive. The Renhold Neighbourhood Plan now forms part of the development plan. It gives specific expression to the community's spatial strategy for Renhold: to protect the distinctive character of the Ends, preserve green gaps, maintain separation from Bedford, and support small-scale housing that meets identified local needs and respects local character.
- 3.5.** The RNP is supportive of growth in the parish, where it is of an appropriate scale and based on local need. Policy RNP1 supports small-scale housing development of up to 10 dwellings where it meets the specific needs identified in the current Housing Needs Survey and positively contributes to local character and distinctiveness. In this regard, it cannot be claimed that the RNP is an obstacle to housing delivery; instead, it supports appropriately scaled, locally needs-led growth and sets clear parameters for how development should take place in the parish. The current proposal is for up to 330 dwellings; therefore, it does not constitute small-scale development, it is not a locally needs-led scheme, and it substantially exceeds the level of local housing need identified in the Renhold Housing Needs Survey 2025. The proposal is therefore fundamentally inconsistent with the made Neighbourhood Plan's approach to housing growth.
- 3.6.** Policy RNP6 is also directly engaged. The site forms part of the Important Green Gap between Salph End and Ravensden Road End and contributes to the wider separation between Salph End and the Bedford urban area. Policy RNP6 requires that, other than development provided for in Policy 7S of the Local Plan, proposals must not compromise openness, lead to coalescence, or affect the undeveloped character of designated Important Green Gaps. This proposal compromises the gap's openness and affects the undeveloped character of the gap, as explained later in the representations. The harm arises from the principle and scale of development, not merely from detailed layout.

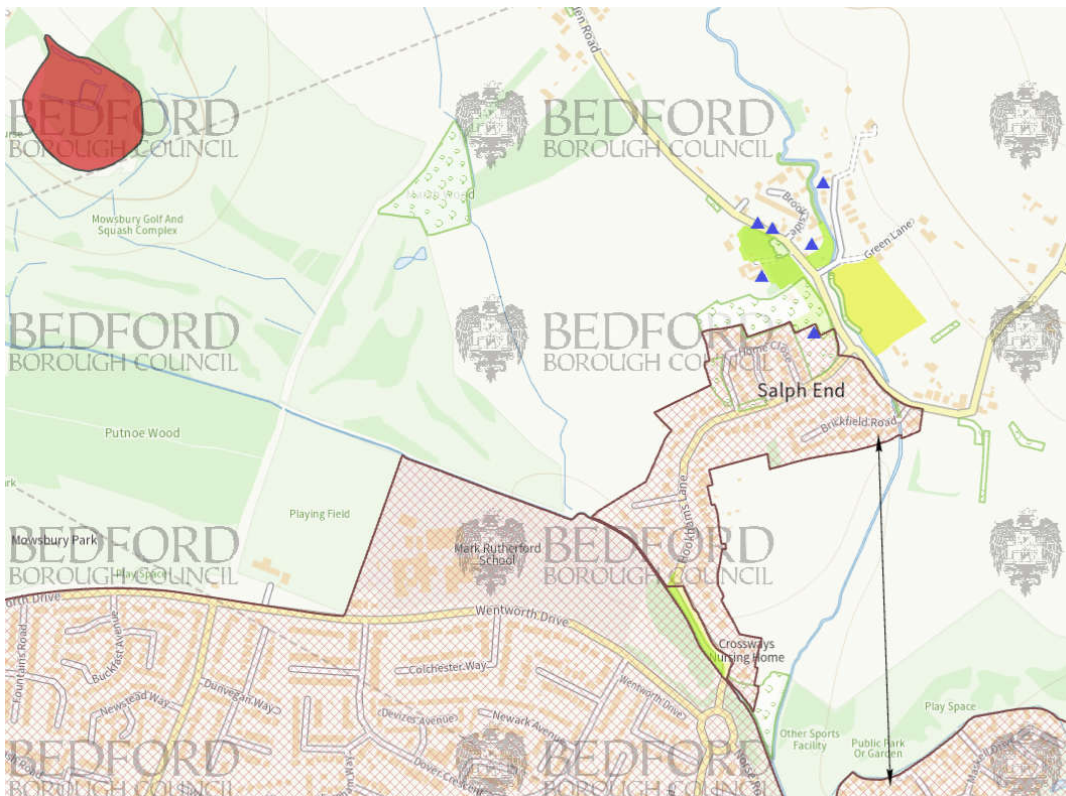


Figure 3: Extract of the Local Plan Policies Map, including the scheduled monument to the north-west (red).

3.7. The Applicant cannot rely on the Policy 7S BBLP exception in Policy RNP6. Policy 7S is a restrictive countryside policy that only permits development in the countryside in limited circumstances, such as forms of development appropriate to a rural location, rural exception housing, or other development meeting specific policy criteria. This proposal is not a rural exception scheme, is not community-led housing, is not small-scale development meeting identified local needs, and is not one of the limited categories of countryside development supported by Policy 7S. It is a major market-led residential estate on unallocated countryside land.

Presumption in favour of sustainable development

3.8. RPC recognises that Bedford Borough Council is unlikely to be able to demonstrate a five-year housing land supply and that, for the purposes of decision-taking, NPPF paragraph 11(d) may therefore be engaged. RPC does not seek to ignore that material consideration. The provision of up to 330 dwellings, including affordable housing, would attract positive weight. However, the tilted balance is not a presumption in favour of any housing development in any location.

3.9. According to NPPF paragraph 11(d), the tilted balance is engaged where the Local Planning Authority cannot demonstrate a five-year housing land supply. In those circumstances permission should be granted, unless:

- a) There is a strong reason for refusal based on the application of policies in the NPPF that protect areas or assets of particular importance: habitats sites, a SSSI, a Green Belt, a Local Green Space, a National Landscape, a National Park, a Heritage Coast, irreplaceable habitats, designated heritage assets and areas at risk of flooding or coastal change; or,
- b) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

3.10. It is also worth highlighting that the NPPF (paragraph 12) establishes limits to the presumption in favour of sustainable development:

“The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted.”

3.11. NPPF paragraph 14 is also relevant. It provides that, where the paragraph 11(d) presumption applies to housing applications, the adverse impact of allowing development that conflicts with a neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the neighbourhood plan became part of the development plan five years or less before the decision and contains policies and allocations to meet its identified housing requirement. The Renhold Neighbourhood Plan plainly satisfies the first limb, having been made in May 2026. RPC also considers that the Neighbourhood Plan contains a clear and recently examined policy framework for meeting locally identified housing needs through Policy RNP1, informed by the 2025 Housing Needs Survey. To the extent that the Council considers the precise paragraph 14 test is not fully met because the Neighbourhood Plan does not allocate strategic housing land, that does not remove the substantial weight to be given to the recently made Neighbourhood Plan as part of the development plan.

3.12. Planning Practice Guidance confirms that neighbourhood planning gives communities direct power to shape development and growth in their area, and that once made, a neighbourhood plan forms part of the development plan used in determining planning applications. The made Renhold Neighbourhood Plan is therefore not a peripheral consideration to be set aside because of a housing land supply shortfall. It is the most recent and locally specific expression of the development plan for Renhold, and it directly addresses the matters at the heart of this application: the scale of housing growth, local housing need, settlement identity, green gaps, design quality, views, green infrastructure and transport.

- 3.13.** The Applicant may argue that the 2020 Inspector considered the site to have some locational merits and that development of the site may be a matter of “when, not if”. However, we consider that this point should not be overstated, as the Inspector dismissed the appeal. The finding was made in a different policy context, before the Neighbourhood Plan was made and before the current local housing needs evidence. The appeal decision remains material, but it does not establish the principle of development on this site.
- 3.14.** The Applicant also points to the Borough’s housing land supply position and the benefits of affordable housing. Those benefits should be weighed, but they do not automatically outweigh conflict with a newly made Neighbourhood Plan. The NPPF supports housing delivery, but it also requires development to be directed to sustainable locations, to reflect local character and needs, to secure well-designed places, to protect heritage assets, and to take account of local circumstances.
- 3.15.** The Applicant’s Planning Statement suggests that the proposal satisfies the presumption in favour of sustainable development and that the tilted balance is engaged, because the development would deliver the following benefits:
- a) 330 dwellings, 30% of which to be affordable, including bungalows.
 - b) Development in a highly sustainable location in walking and cycling distance to services and facilities, supporting a shift away from car use.
 - c) On-site open space for residents and green infrastructure, including a landscape buffer along Ravensden Road.
 - d) Net gain in biodiversity greater than 10%.
 - e) Highway and pedestrian safety works.
 - f) High-quality scheme in terms of design.
 - g) Drainage and flood risk mitigation.
 - h) Economic activity during construction and local spending.
 - i) CIL and other contributions.
- 3.16.** RPC does not accept that the **benefits** identified by the Applicant should be afforded the weight claimed. The provision of housing, including affordable housing and bungalows, is a positive consideration in principle, particularly in the context of housing land supply. However, the proposed quantum and mix substantially exceed the locally identified need for Renhold and are not a needs-led response to this location. The proposal has also not demonstrated full compliance with affordable housing tenure requirements, integration, clustering, specialist housing, or accessible and adaptable housing standards. The housing benefit should therefore be moderated.

- 3.17.** The site is also not, as claimed, such a highly sustainable location. It lacks convenient access to a sufficient range of services and facilities by walking, cycling and sufficiently frequent public transport, and the proposal would not materially discourage reliance on the private car. No meaningful contributions are proposed towards sustainable transport infrastructure and services. Accordingly, no positive weight should be given to the claimed locational sustainability of the site. The open space provision is largely required to meet the needs of a development of this scale, and the proposed landscape buffer along Ravensden Road is not a benefit but an inadequate attempt to mitigate harm to the Important Green Gap. Similarly, highway works, footway works, drainage infrastructure, flood-risk measures, CIL and planning obligations should generally be treated as mitigation or policy compliance, not as freestanding public benefits. Biodiversity net gain beyond the statutory 10% requirement may attract limited positive weight, but only to the extent that the additional gain is robustly demonstrated, secured and deliverable.
- 3.18.** Against those moderated benefits, the proposal would give rise to **substantial adverse impacts**. It would conflict with the adopted spatial strategy by introducing major residential development on unallocated countryside land outside the Settlement Policy Area. It would also conflict with the made Renhold Neighbourhood Plan, including its locally specific strategy for small-scale, needs-led growth and the protection of Important Green Gaps. The proposal would substantially erode the openness and undeveloped character of the gap between Salph End and Ravensden Road End, weaken the wider rural transition between Salph End and Bedford, and urbanise open agricultural countryside. It would fail to reflect the linear and shallow settlement pattern of Renhold's Ends, instead introducing an estate-form development at depth with a suburban character. It would also give rise to less than substantial harm to the setting of Mowsbury Hill Scheduled Monument, deterioration of the rural experience of public rights of way, including the loss of a protected view identified in the RNP and harm to other wider views. Other deficiencies in green infrastructure connectivity and unresolved concerns regarding active travel and public transport accessibility are relevant. These harms are not minor or capable of being resolved wholly at reserved matters stage; they arise from the principle, location, quantum, access proposals and broad parameters of the development. RPC therefore considers that the adverse impacts would significantly and demonstrably outweigh the limited benefits of the proposal when assessed against the development plan and the NPPF as a whole.
- 3.19.** Considering the above, RPC concludes that the presumption does not indicate that permission should be granted. The development would fail to comply with paragraph 11 of the NPPF requirements and would provide a sufficiently strong reason to refuse the development due to adverse impacts not being outweighed by the benefits of the proposal.

Principle of development: Conclusion

- 3.20.** This is a substantial, speculative extension of suburban development into the countryside, outside any settlement boundary, which fails to comply with the limited circumstances and criteria in Policy 7S (including the tests of identified community need, appropriate local scale, and community support). It also conflicts directly with the made RNP, particularly Policy RNP1 (small-scale housing up to 10 units) and RNP6 (Important Green Gaps).
- 3.21.** Even in the scenario in which the NPPF presumption of sustainable development is engaged, the paragraph 11(d)(ii) test is not met. The proposal's adverse impacts would significantly and demonstrably outweigh the limited benefits claimed. Accordingly, the proposal is contrary to the development plan (including the made Neighbourhood Plan) and is inconsistent with the NPPF and should be refused on principle.

4. Transport and accessibility

- 4.1.** RPC recognises that, in the 2020 appeal decision, the Inspector did not treat the site's locational sustainability as a determinative reason for refusal. The Inspector considered that the site had some locational merits, including its relationship with Salph End and some access to services and public transport. However, those findings should not be overstated. The current proposal is different: it is a wholly residential scheme, with no primary school or other meaningful on-site community facilities, and it must be assessed against current evidence, including the made Renhold Neighbourhood Plan.
- 4.2.** The Applicant's claim that the site is in a highly sustainable location is not accepted. The site occupies an edge-of-settlement, countryside location and future residents are likely to rely heavily on private cars for day-to-day journeys. Although some pedestrian, cycle and public transport options exist, they do not provide a realistic or robust alternative to the car for most residents. The walking catchment analysis provided by the Applicant is also overly optimistic and unrealistic because it relies heavily on radius distance rather than the quality, directness, safety and convenience of actual routes. In practical terms, few day-to-day services are within a 10-minute walk from the centre of the site, other than the post office/convenience store.

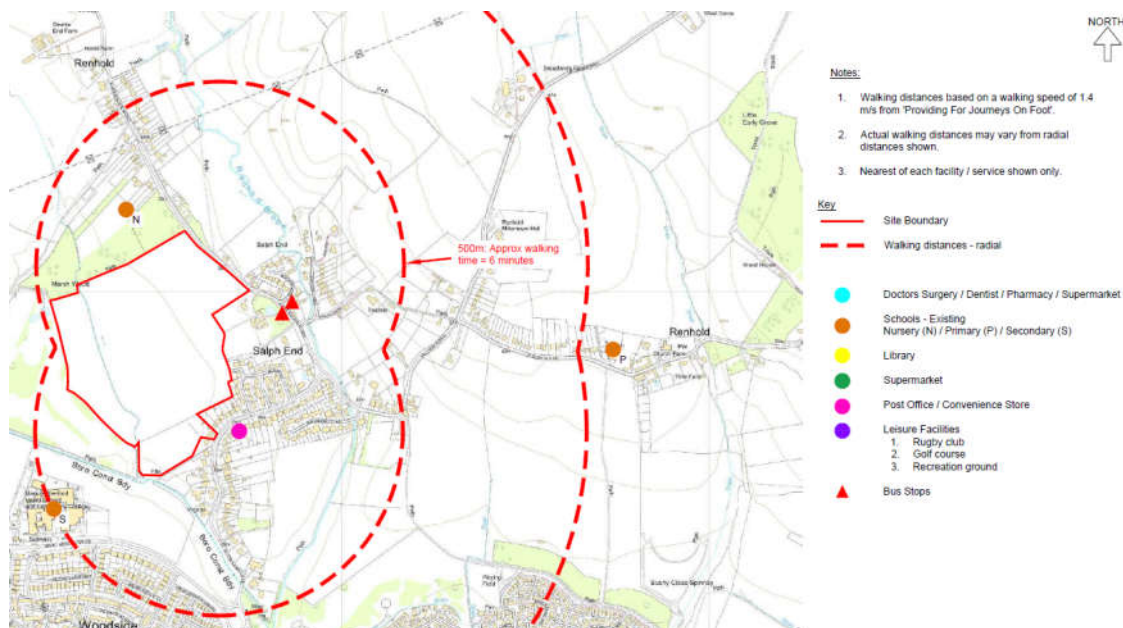


Figure 4: Extract of the Transport Assessment showing the claimed walking distances from the site.

- 4.3.** The existing pedestrian environment is very constrained. Ravensden Road has a substandard footway only on the north side of the road, it is narrow, with limited continuity and several crossings that would not create a clear, legible or convenient walking network for all users. The proposed new footway along Ravensden Road is limited in extent and primarily connects the site with the nursery. That is not sufficient to create a connected village-wide pedestrian network. Similarly, the proposed widening or provision of footway/cycleway on Hookhams Lane is described as provided “where feasible”, which does not demonstrate certainty of delivery. In any event, the route towards Bedford would still involve multiple crossings, wavy alignments and a pedestrian/cycle environment that is unlikely to be sufficiently attractive to change everyday travel behaviour for all.
- 4.4.** Existing bus services are limited, infrequent and not sufficiently convenient for future residents. RPC is especially concerned that the Applicant does not appear to propose any secured improvement to bus provision, whether by increased frequency, extended operating hours, Sunday or evening services, diversion of an existing service through the site, a new bus route, upgraded bus stops, or a financial contribution through a planning obligation. A spine road capable of physically accommodating buses is not the same as securing a usable bus service.



Figure 5: Photograph of Ravensden Road, north of the application site, showing the single narrow pavement along the road.

- 4.5. RPC agrees with the concerns raised by Active Travel England, including the absence of forecast active travel trips, the limited number of services and amenities within reasonable walking distance via acceptable routes, the lack of assessment of lighting and crossings, poor access to frequent bus services, and the need for enhanced internal permeability. These concerns go directly to whether the site can offer a genuine choice of transport modes to all future residents.
- 4.6. The submitted Framework Travel Plan does not overcome the above deficiencies in terms of sustainable travel and accessibility. Its measures are largely promotional and procedural, including travel information, welcome packs, monitoring, targets and a Travel Plan coordinator. Such measures may be appropriate as supporting measures, but they are not a substitute for a genuinely sustainable location, direct and attractive active travel routes, or a secured improvement to public transport provision. In this case, the Framework Travel Plan reads as a tick-box exercise rather than a realistic strategy capable of materially changing travel behaviour towards sustainable modes.
- 4.7. The proposal therefore conflicts with BBLP Policies 31, 53 and 87, which require development to be accessible by sustainable modes, minimise reliance on the private car, and support public transport provision where appropriate. It also conflicts with Policy RNP9 of the RNP, which requires development generating additional vehicle movements to mitigate transport impacts and support sustainable and active travel. At best, the transport and accessibility position should

attract neutral weight in the planning balance rather than the positive weight claimed by the Applicant. RPC considers that, on the current evidence, it should weigh against the proposal.

5. Gaps between built-up areas

Salph End – Ravensden Road End Gap

- 5.1.** The Renhold Neighbourhood Plan identifies the preservation of green gaps as a central component of parish spatial strategy, character and identity. This is not a residual landscape matter; rather, it reflects the historic and still-legible structure of Renhold as a parish formed of distinct settlement clusters or “Ends”, separated by areas of open countryside. Objective 2 of the Neighbourhood Plan is expressly “to preserve the green gaps between Renhold and the Bedford urban area and between each of the Renhold Ends to avoid physical and visual coalescence and to conserve character and identity”. Alongside, Policy RNP6 then provides that, other than development provided for in Policy 7S of the BBLP, proposals must not compromise the openness, lead to coalescence, or affect the undeveloped character of the designated Important Green Gaps.
- 5.2.** The Renhold Design Guidance and Codes, which forms part of the Neighbourhood Plan evidence base, reinforces this point. It explains that a key characteristic of Renhold is that its settlements are divided by green gaps that are open and undeveloped, provide clear views into the surrounding countryside, and maintain the rural context of the Ends. It also explains that these gaps help maintain a distinct sense of place when moving between each of the Ends, and that their identity is an important feature for the local community. The purpose of the gaps is therefore not limited to a narrow visual appreciation from the road. It is also concerned with openness, undeveloped countryside, settlement identity, rural character and the prevention of physical and visual coalescence.
- 5.3.** The application site forms a substantial part of the gap between Salph End and Ravensden Road End. The site is currently undeveloped, agricultural land, with hedgerows and trees along its edges and limited internal interruption. This means that its openness is experienced not only from Ravensden Road, but also from public rights of way, including Footpaths 11 and 39, and from within the site itself. The whole of the eastern and central part of the site contributes to the perceived and actual separation between the two Ends. This is particularly important because, on the south side of Ravensden Road, the openness of the gap relies very substantially on this application site. The land further north includes Marsh Wood, which performs a separate green infrastructure and screening function, and whilst it does not have the same openness character, it contributes to the green gap.

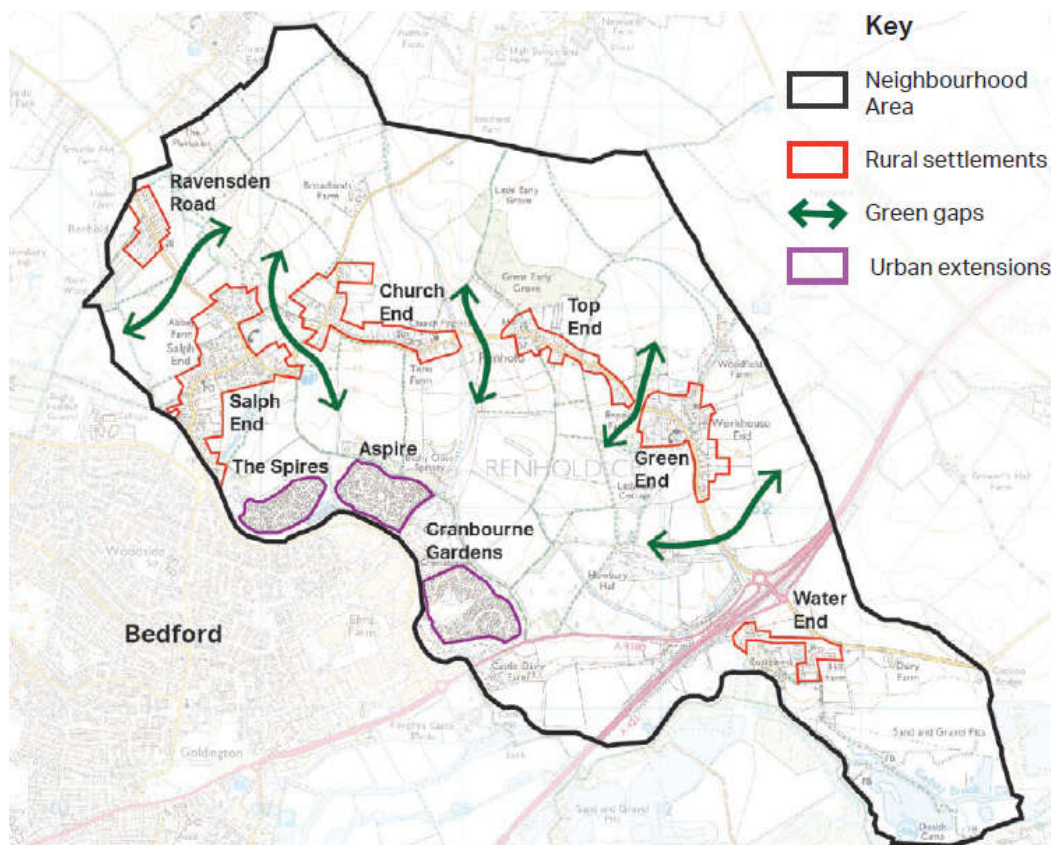


Figure 6: Extract of the Renhold Neighbourhood Plan Design Guide & Codes.

- 5.4.** The proposal would fundamentally alter the gap so that it would be almost completely lost. The development would introduce built form, estate roads, junctions, footways, lighting, domestic activity, parking areas, engineered drainage features and associated hard and soft landscape across much of the existing open agricultural land. Whilst the western parcel would remain as open space, most of the land that currently provides the publicly appreciable openness between Salph End and Ravensden Road End would be developed. The effect would not be a modest adjustment to the gap; it would be the loss of its open and undeveloped character across the main part of the site.
- 5.5.** The Applicant's approach relies heavily on a landscape buffer along Ravensden Road, said in the LVIA to range between approximately 35m and 50m in depth. RPC does not accept that this is sufficient to satisfy Policy RNP6. The designated gap is not simply a roadside verge or narrow visual corridor. It relates to the open countryside between settlement clusters. A buffer of 35m to 50m along the frontage cannot preserve, mitigate or compensate for the introduction of a major housing estate immediately behind it, particularly where the existing gap between the two Ends would be reduced substantially. RPC's assessment is that the current separation between Salph End and the Ravensden Road End cluster is approximately 340m to 360m. The proposed development would reduce the

effective gap to around 100m to 130m. That would be a material and harmful erosion of the physical and visual separation that Policy RNP6 seeks to preserve.

- 5.6. We are also concerned that the proposed buffer would not remain wholly open or undeveloped in character. The Parameters Plan and access proposals show that the Ravensden Road frontage would include access infrastructure, visibility works, pedestrian infrastructure and associated changes to the roadside environment. The proposed access from Ravensden Road would itself be a suburbanising intervention within the gap, involving a wide access point, associated footway, crossing arrangements, and the removal or alteration of existing hedgerow and verge features. In addition, the proposal includes a new 150-metre-long footway along part of the south side of Ravensden Road, which may be promoted as a transport improvement but would also urbanise the rural lane and weaken the informal, verdant character of the gap.
- 5.7. The Applicant's suggestion that planting and screening can preserve the gap misunderstands the policy purpose. Policy RNP6 is not a policy about hiding development from view. It is concerned with openness, coalescence and undeveloped character. Screening may, over time, filter some views of built form, but it does not preserve openness where development has in fact occupied the open countryside. Nor does it preserve the undeveloped character of the gap where the land has been converted into a residential estate. Nevertheless, the Applicant accepts that built development would remain visible from Ravensden Road, and this would be especially apparent at the new access point, where road users would experience not a green gap, but an entrance into a large development extending at depth into the site.
- 5.8. RPC also disagrees with the Applicant's reliance on the Neighbourhood Plan examination process to suggest that the gap is merely linear or confined to the immediate road frontage. The Examiner's comments do not support that interpretation. The Examiner did not reject the principle of protecting gaps between Ends; instead, the Examiner recognised that the purpose of the policy was the principle of avoiding coalescence, not merely protecting private outlook. The use of indicative arrows on the Policies Map provides flexibility in interpretation and avoids the impression of rigid exclusion zones, but it does not mean that the gap is limited to a narrow strip of verge along Ravensden Road. The correct interpretation is context-led: the decision-maker must assess whether the proposal would compromise openness, lead to coalescence or affect the undeveloped character of the gap between the Ends.

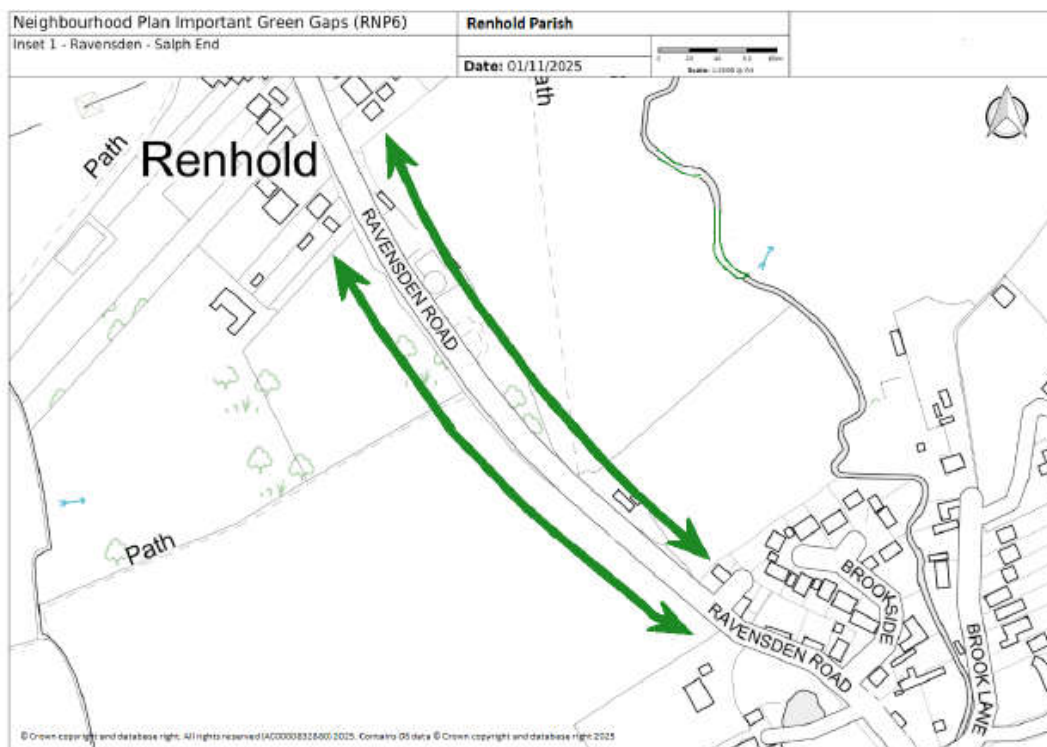


Figure 7: Extract of the RNP showing the Important Green Gap between Salph End and Ravensden Road End.

5.9. The Applicant also relies on the previous appeal Inspector’s comment that it is characteristic of the various Ends of Renhold that they “rather dribble one into another with little clear separation”. RPC does not accept that this resolves the matter in favour of the current proposal. First, the made Neighbourhood Plan post-dates that appeal decision and now forms part of the development plan. It gives specific policy expression to the importance of preserving green gaps and the separate identity of the Ends. Secondly, the gap between Salph End and Ravensden Road End remains legible and materially dependent on the openness of the application site. Thirdly, even if some historic settlement edges in Renhold are diffuse, that does not justify a major unallocated development that would substantially reduce and urbanise one of the very gaps now protected by the made Neighbourhood Plan.

5.10. The character of the Ravensden Road frontage is also relevant. Existing buildings within the Salph End settlement boundary along Ravensden Road are few, dispersed and set within large plots and gardens. Most of the green and garden land along Ravensden Road is designated as Village Open Space under Policy AD40 of the ADLP. This reinforces the fact that the local character is not one of continuous suburban development, but rather a verdant, rural-edge settlement pattern in which buildings sit within a wider green and open context. This area of designated Village Open Space forms part of the green gap between the two Ends. The

proposed development would represent a substantial departure from that character by introducing a large estate form behind the frontage and eroding the spatial separation that presently defines this part of Renhold.

5.11. Policy RNP6 is also linked to Policy 7S of the Local Plan. RNP6 only allows for development provided for in Policy 7S, which is a restrictive countryside policy and does not support development of the form, nature or scale now proposed. The scheme is not a rural exception housing scheme, is not small-scale development meeting local needs, and is not otherwise one of the limited categories of countryside development supported by Policy 7S. The Applicant cannot therefore rely on the Policy 7S exception within RNP6.

5.12. For these reasons, RPC considers that the proposal would conflict with Policy RNP6 of the RNP. It would compromise the openness of the Important Green Gap, lead to a substantial reduction in separation between Salph End and the Ravensden Road End cluster and affect the undeveloped character of the gap. It would also conflict with the wider objectives of the Neighbourhood Plan, the Renhold Design Guidance and Codes, Policy 7S and Policy 37 of the Local Plan, and the development plan's broader aim of conserving local landscape character and settlement identity. The harm is not capable of being overcome by a frontage buffer or additional planting because the issue arises from the principle, scale and spatial extent of the proposed development in this location.

Salph End – Bedford Gap

5.13. RPC acknowledges that the 2020 appeal decision did not treat coalescence between Salph End and Bedford as a determinative issue. The Inspector considered that Salph End already had only a limited visual break from Bedford at its southern end, and that the appeal site would remain separated from Bedford by open land including Mowsbury Golf Course and the Mark Rutherford School playing fields.

5.14. However, the current proposal must now be assessed in the context of the recently made Renhold Neighbourhood Plan, which gives clear development plan weight to preserving the green gaps between Renhold and the Bedford urban area, as well as between the individual Ends. This is not limited to preventing the physical joining of buildings. It also concerns rural character, settlement identity, and the perception of leaving Bedford and entering Renhold.

5.15. Saved Policy AD42 of the ADLP is also relevant to the wider planning context. Its supporting text identifies that Salph End immediately adjoins the urban area and extends northwards from it, but that separation needs to be maintained in relation to development on Norse Road, where the gap is less than 600m. It also states that development on the east side of Salph End is likely to reduce openness and contribute to visual coalescence with Bedford, thereby affecting the separate character and identity of Salph End. Although the application site lies to the north-

west of Salph End rather than within the mapped AD42 gap to the south-east, the same policy concern is engaged: Salph End is a settlement edge where remaining open land plays a critical role in maintaining separation from the Bedford urban area and protecting the settlement's separate identity which the Local Plan and RNP aim to conserve.

- 5.16.** The application site forms part of the wider green and undeveloped fringe that helps maintain Salph End's separate identity. Its open agricultural character, brook corridor, public rights of way, hedgerows and relationship with surrounding open land all contribute to the rural setting of Salph End and to the transition between Bedford and Renhold.
- 5.17.** The proposed development would weaken that function by introducing a large suburban estate at depth behind Hookhams Lane and Ravensden Road. Even if a physical gap to Bedford would remain, the scheme would further urbanise the northern fringe of Bedford and make Salph End read more strongly as part of a continuous urban edge rather than as a distinct rural End.
- 5.18.** Accordingly, development would erode the rural transition between Bedford and Renhold and conflict with the Neighbourhood Plan's objective of preserving separation, character and identity.

6. Landscape and design

- 1.1. RPC acknowledges that the 2020 appeal decision did not treat wider landscape character harm as a determinative issue. However, the current application must be assessed against the development plan in force, including the made Renhold Neighbourhood Plan and the Renhold Design Guidance and Codes. Policy RNP2 requires development in Renhold to comply with the design principles, guidance and codes in that document.
- 1.2. The Design Code explains that the rural Ends are predominantly linear settlements following the historic routes through the parish, with relatively shallow depth, limited backland routes, low density, irregular layouts, low-rise buildings, and gaps between buildings and settlements. It also identifies Ravensden Road as a rural settlement with generally single-depth plots, varied building lines, long plots and a verdant character. These are central to the sense of place of Renhold and Salph End.
- 1.3. The proposal does not respond positively to this settlement pattern. It would introduce a substantial estate-form development at depth behind Hookhams Lane and Ravensden Road, rather than development that follows the established linear structure of the settlement. The Parameters Plan shows a primary route through the site and secondary streets serving built form internally, creating a new suburban estate morphology, rather than reinforcing the prevailing pattern of plots and buildings addressing the principal rural routes. The scheme would therefore read as

a separate housing estate inserted into the countryside, not as a sensitive extension of Salph End.

- 1.4. The submitted illustrative material also indicates design weaknesses that cannot simply be deferred to reserved matters. The Design and Access Statement shows a layout strongly influenced by estate roads, cul-de-sacs, private drives and prominent parking. The Design Code recognises that cars are a practical necessity in rural communities but is clear that parking should not dominate frontages or undermine the rural character of streets. The Applicant's indicative layout appears to rely on extensive front-of-plot parking, on-street parking and parking-dominated streets, which would erode the quality of the public realm and reinforce a car-led suburban character. This demonstrates that the site has no capacity for 330 dwellings to be designed in a positive way in response to the design-related policies and guidance in the development plan, therefore this becomes an issue at outline stage as the Applicant cannot demonstrate that the site is capable of accommodating a policy-compliant design proposal.
- 1.5. The illustrative layout includes numerous cul-de-sacs and limited permeability between blocks, particularly towards the site edges. This conflicts with the principles of good placemaking and active travel, and it is consistent with Active Travel England's concern that the layout illustrated in the DAS implies low active travel permeability between clusters of housing, with trips forced back onto the central spine road. A genuinely landscape-led and people-focused layout would provide a finer grain of direct, legible and attractive pedestrian and cycle connections, rather than a street pattern dominated by vehicular access and private drives.
- 1.6. The proposed settlement edge is also weak. Rather than forming a carefully composed rural edge, the development risks presenting side and rear boundaries, cul-de-sacs, private drives, parking areas and buffer spaces to the existing settlement edge with no clear function. The buffer between the proposed development and the rear of Abbey Farmhouse, Carlyon House and Home Close appears to function primarily as separation land rather than as a positive landscape or public realm space. It would create an awkward relationship with the existing edge of Salph End and would not provide a convincing placemaking response.
- 1.7. The scheme also fails to take clear opportunities to work with the site's historic landscape structure. There is evidence of former field boundaries and historic landscape structure associated with Abbey Farm. A landscape-led scheme, as claimed by the Applicant, could have restored field boundaries, hedgerows, tree planting and green links as structuring elements of the layout. Instead, the proposal retains only limited existing features and does not appear to use the historic field pattern to shape the development. This is a missed opportunity to reinforce local

distinctiveness, improve green infrastructure connectivity and create a layout rooted in the site's rural history.

- 1.8. The access arrangements are also deficient. The Hookhams Lane access would create a constrained and unattractive gateway into a major housing estate, with long side boundaries to existing properties forming part of the approach to the site. The Ravensden Road access and associated highway works would also introduce a more engineered and suburbanised character into a rural lane environment. These access impacts are not merely detailed design matters; they arise from the principle and scale of the development and the need to force estate infrastructure into a rural settlement edge.

Heritage

- 1.9. In heritage terms, RPC notes that the Applicant and previous appeal decision placed limited weight on effects to nearby listed buildings, including Abbey Farmhouse. However, the acceptability of the proposal should not be assessed only by asking whether there is direct harm to the fabric or immediate setting of the listed building. Abbey Farmhouse sits within a wider historic rural context, including Ravensden Road, former field patterns, glimpsed views, mature vegetation and the agricultural land historically associated with this part of Salph End. The proposed suburban estate form, road infrastructure, cul-de-sacs and screening belts would not represent a sensitive response to that wider historic landscape context.



Figure 8: Historic map of Salph End. Source: National Library of Scotland.

- 1.10. RPC agrees with Historic England that the proposal would affect the setting of Mowsbury Hill Scheduled Monument. Historic England has confirmed that the development would introduce a substantial area of built form into the surrounding landscape, altering the character of the landscape within which the monument is experienced and diminishing its historic relationship with a more open, rural setting. Historic England considers that the scheme would result in less than substantial harm. That harm is established at outline stage and must be weighed in the planning balance. Whilst reserved matters could influence the degree of harm, they cannot remove the fundamental effect of urbanising open agricultural land within the monument's wider setting.
- 1.11. Overall, the proposal would not provide a convincing landscape-led or character-led response to the site. It would replace open agricultural land with a suburban estate form that conflicts with the linear settlement pattern of Salph End, weakens the rural setting of the Ends, fails to use historic landscape structure as a meaningful design cue, and gives rise to harm to heritage assets. The fact that layout, scale, appearance and landscaping are reserved does not answer these concerns. They arise from the proposed quantum of development, the broad disposition of built form, the access strategy and the parameters now before BBC.

Green Infrastructure

- 6.1. Policy 35S of the BBLP requires existing green infrastructure to be protected, enhanced and managed for the future benefit of the environment, people and the economy. It also requires development to provide a net gain in green infrastructure and to seek to deliver a high-quality, multi-functional green infrastructure network in accordance with the Bedford Green Infrastructure Plan. This is directly relevant to the application site because the western parcel forms part of the green infrastructure network to the north of Bedford. Saved Policy AD24 of the ADLP identifies Green Infrastructure Opportunity Zones, including Zone 6: Bedford Northern Fringes, expecting development to deliver or contribute to the protection, enhancement and creation of green infrastructure in accordance with the priorities for the relevant zone. The western parcel forms part of the Opportunity Zone.
- 6.2. The relevant priorities for the Bedford Northern Fringes include creating walking, cycling and horse-riding routes linking villages to the north of Bedford with the northern section of the Bedford Green Wheel; managing and enhancing hedgerows and linking habitats through adjacent green spaces associated with schools and sports fields; enhancing existing public open spaces; and improving the interpretation of historic environment features such as Mowsbury Hillfort. These priorities are not simply about providing open space within a development site. They are concerned with connectivity, permeability, landscape, biodiversity, historic environment and public access, all operating together as a multi-functional green infrastructure network.

- 6.3.** The Applicant relies heavily on the western field as the scheme's principal green infrastructure benefit. The Parameters Plan shows a large area of open space west of the brook, together with an indicative pedestrian route through the open space and connections back into the development. The Planning Statement also says that the proposal seeks to take opportunities under Policy 35S and Policy AD24 by providing access to the western parcel and by delivering a large area of semi-natural open space. However, RPC considers that this overstates the quality of the proposal. The scheme does not create any meaningful new walking, cycling or horse-riding route beyond the site, nor does it deliver a new strategic connection between Salph End, the villages to the north of Bedford, the Bedford Green Wheel, Mark Rutherford School / community facilities to the south, or Mowsbury Hill. It also does not provide any clear interpretive or access-related enhancement associated with Mowsbury Hillfort.
- 6.4.** We also consider that the western parcel should not be treated as an isolated open space asset. Its policy importance lies in its role as part of a wider green infrastructure network, connecting north-south and east-west through the landscape. The current site contributes to that network by virtue of its open agricultural nature, but the proposal would substantially weaken east-west green infrastructure connectivity by placing a substantial residential estate between Ravensden Road and the western Green Infrastructure asset. The Applicant's "green streets" are not an adequate substitute for genuine landscape-scale green infrastructure links. They are, as shown in the Design & Access Statement, internal streets within a housing estate and would not provide sufficiently wide, continuous, legible or ecologically robust green connections between the Green Infrastructure asset west of the brook and the existing green infrastructure and village open spaces along Ravensden Road.
- 6.5.** In RPC's view, a genuinely landscape-led and Green Infrastructure-led scheme would have treated the western parcel as part of a connected network rather than as an offsetting open space to justify development elsewhere on the site. At a minimum, the proposal should have included direct, attractive and publicly legible green routes connecting Footpaths 11 and 39, with scope for dedication as public rights of way; stronger east-west green corridors linking the Ravensden Road frontage, Village Open Spaces and western Green Infrastructure land; and a clearer strategy for improving access to, and interpretation of, nearby heritage and landscape assets including Mowsbury Hill. Instead, the proposal provides a winding internal pedestrian route that is not clearly proposed as a dedicated public right of way.

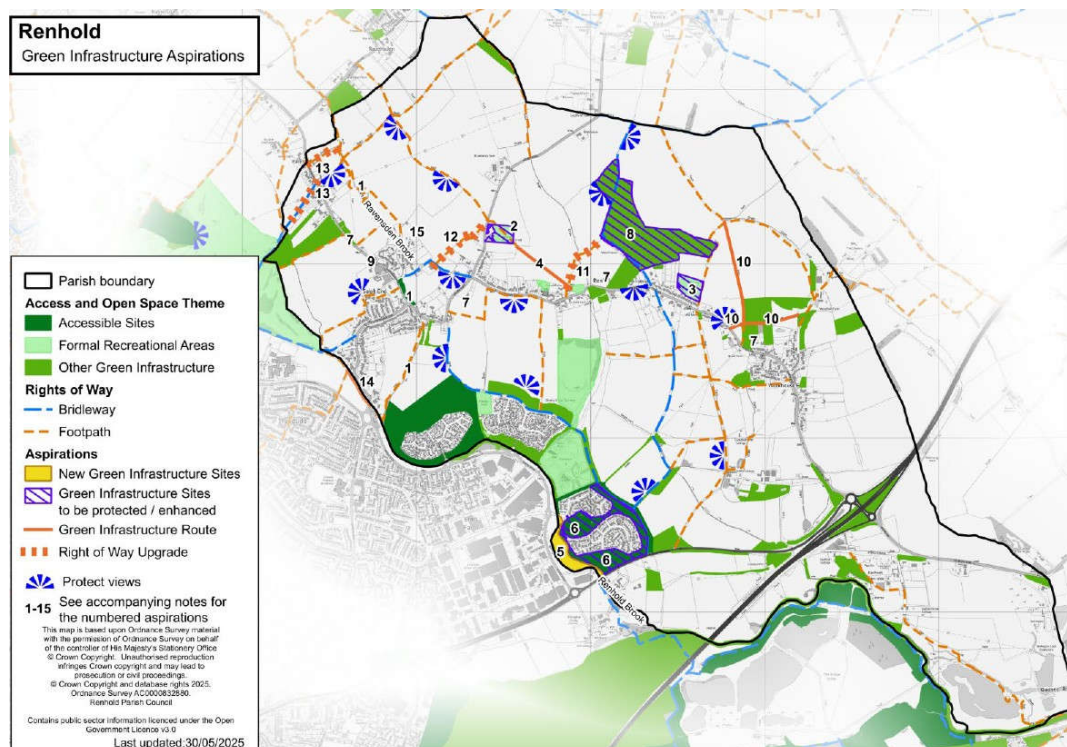


Figure 9: Green Infrastructure Aspirations in the Renhold Neighbourhood Plan, showing the protected views.

- 6.6.** The Renhold Parish Green Infrastructure Plan 2023 reinforces this concern. It identifies the value of Renhold's countryside, ancient woodland, hedgerows, biodiversity, public rights of way and open spaces, and records aspirations that are directly relevant to this site, including preserving separation between the Ends, resisting infill, and planting, protecting and enhancing hedgerows and trees, including those along Ravensden Road. It also identifies wider aspirations such as improving the surfacing of footpaths and bridleways, creating allotments, and providing seating at viewpoints along public rights of way. The submitted scheme does not respond sufficiently to these locally identified aspirations.
- 6.7.** The same concern applies to public rights of way. Policy RNP4 expects development to upgrade and extend public footpaths and bridleways where possible to provide a multi-functional green infrastructure network and encourage non-vehicular travel. The Applicant's highway-related pedestrian works, including the proposed footway along Ravensden Road, are the mitigation necessary to access the site safely. They should not be confused with enhancement of the existing public rights of way network. The existing network, particularly Footpaths 11 and 39, would experience a marked deterioration in countryside character and recreational quality, as open agricultural land would be replaced by suburban residential development. No defined upgrade to the public right of way network is proposed, no new dedicated right of way is shown through the western GI parcel, and no clear contribution is

offered to improve nearby footpaths or bridleways, including their accessibility or width.

- 6.8.** RPC therefore considers that the proposal does not demonstrate compliance with Policy 35S, saved Policy AD24, Policy RNP4 or Local Plan Policy 91. Whilst the scheme would provide open space, it would not deliver the type of connected, multi-functional, landscape-led green infrastructure envisaged by the development plan and local Green Infrastructure evidence. The proposal would instead fragment existing countryside experience, weaken east-west GI connectivity, and fail to take opportunities to strengthen the public access, biodiversity and historic environment functions of the Bedford Northern Fringes green infrastructure network.

Protected views

- 6.9.** Policy RNP4 of the RNP requires development to respect and enhance the significant views identified in the Renhold Green Infrastructure Study. This requirement is central to the assessment of this application because the site is crossed and experienced from public rights of way, and because one of the significant views identified in the Green Infrastructure evidence lies within, or at the edge of, the application site.

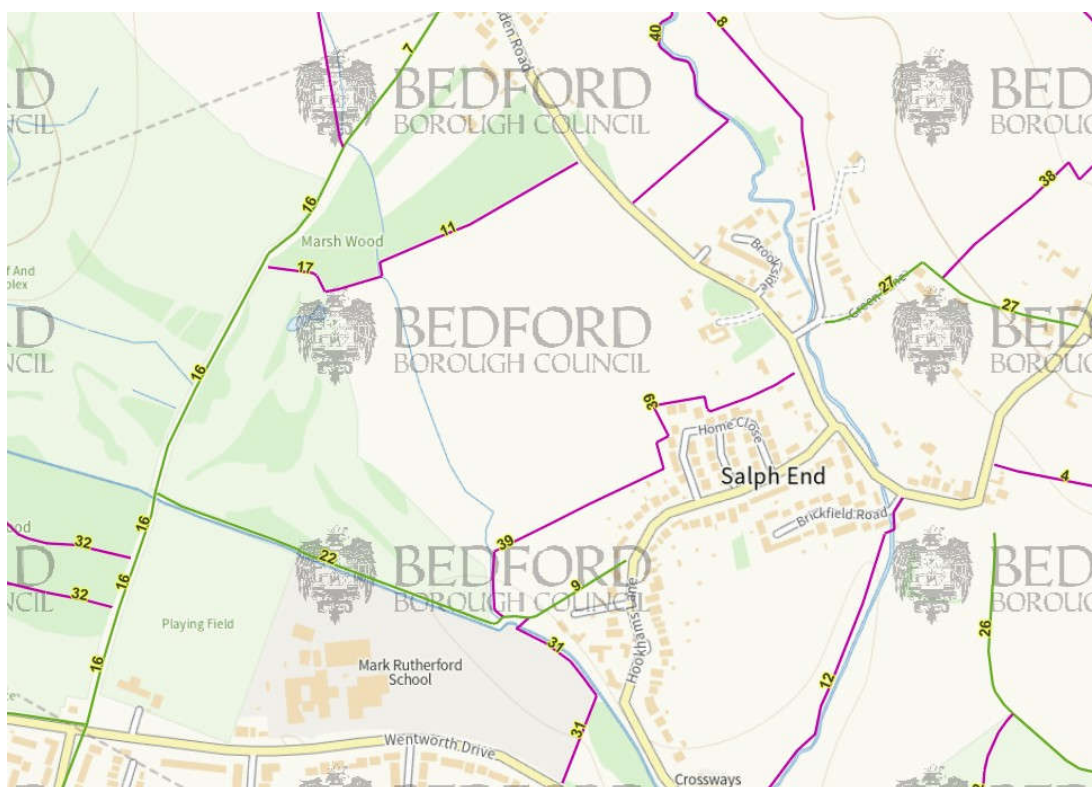


Figure 10: Map of public rights of way within the area. Source: Bedford Borough Council.

- 6.10.** The Planning Statement acknowledges that Policy RNP4 protects significant views from the corner of Footpath 39 as it enters the site from Ravensden Road. The Applicant accepts that the view would be “harder to mitigate and impossible to avoid” because built form would be introduced into the immediate foreground. It also accepts that enhancement would not be secured and that there would be conflict with Policy RNP4. This is important to RPC, as the development would not merely affect a general rural view, it would affect a locally identified significant view forming part of the made Neighbourhood Plan evidence base.



*Figure 11: Views looking south-west (top) and north-west (bottom) across the site.
Source: Design and Access Statement.*

- 6.11.** The view from Footpath 39 is important because it allows an appreciation of the rural setting of Salph End and the distinctive spatial character of Renhold’s Ends. From this viewpoint, the viewer experiences an open agricultural field, with the wooded and treed backdrop beyond, and without a dominant perception of the nearby Bedford urban area. The view helps explain the relationship between Salph End, its countryside edge, the wider Renhold landscape and the wooded green infrastructure network to the west and north. It is therefore not simply a visual amenity issue, but an expression of the settlement’s identity, gaps between built-up areas and Renhold’s rural context.
- 6.12.** The submitted Parameters Plan places residential development immediately adjacent to the identified viewpoint and in the direction of the protected view. The effect would be to introduce built form into the foreground, interrupt the open field view, lose the appreciation of the wooded backdrop, and replace the rural agricultural character of the view with a suburban residential edge. It cannot credibly be claimed that the protected view has been meaningfully accommodated in the development parameters.
- 6.13.** RPC does not accept the Applicant’s proposals, as Policy RNP4 requires development to respect and enhance significant views; it does not allow significant

views to be harmed simply because the development layout has been arranged in a way that makes the harm unavoidable.

6.14. The submitted LVIA also acknowledges that open agricultural views from the public rights of way would be largely lost. This is highly relevant, because Footpaths 11 and 39 are amongst the main public routes from which Salph End's rural setting and the gap between built-up areas are appreciated. The Applicant seeks to mitigate visual effects through retained buffers, new planting and internal green routes. However, planting cannot replace the experience of an open agricultural field, nor can it restore the direct appreciation of countryside and woodland backdrop once a residential estate blocks the view.

6.15. The proposal would fundamentally alter the experience of the public rights of way crossing and adjoining the site. Instead of passing through or alongside open countryside, users of Footpaths 11 and 39 would experience a suburban residential development, internal roads, access infrastructure, domestic activity, lighting and managed open space. Footpath 39 would also be affected by the proposed access arrangements, with the pedestrian route interrupted by new vehicular infrastructure. This would reduce its recreational and experiential value and would fail to accord with the development plan expectation that access to the countryside should be protected and, where possible, enhanced.



Figure 12: View looking south from Footpath 21 north of the site. Source: LVIA.

6.16. Furthermore, the site would be visible from higher ground to the north, as demonstrated by the LVIA (Viewpoints 20 and 21). Notwithstanding the LVIA's claim that the views would be glimpsed only, the view would be particularly clear in winter and the development would dominate the rural landscape scene.

- 6.17.** For these reasons, RPC considers that the proposal conflicts with Policy RNP4 of the RNP and Policy 91 of the BBLP. This conflict should be afforded **significant weight** in the planning balance.

Surface water and SuDS

- 6.18.** RPC is concerned with the submitted Flood Risk Assessment and drainage strategy, as they do not demonstrate a robust, policy-compliant or genuinely landscape-led approach to sustainable drainage.
- 6.19.** Policy 93 of the BBLP requires surface water to be managed through sustainable drainage systems (SuDS) and gives priority to discharge to the ground via infiltration before discharge to a watercourse. The Applicant's drainage strategy is based on discharging surface water to the existing brook, on the basis that infiltration is expected to be unviable due to the site's geology. However, infiltration testing has not yet been carried out. This means that the dismissal of infiltration is unevidenced. Given that infiltration is a priority in the SuDS hierarchy and can provide the most meaningful form of surface water management, RPC considers that the Applicant should demonstrate through testing whether infiltration is possible, and where opportunities for infiltration can be maximised.



Figure 13: Drainage plan showing the catchment areas and location of basins.

- 6.20.** RPC is also concerned that the Applicant refers to a SuDS strategy including swales and rain gardens, but these are not in the submitted design material. The Parameters Plan and attenuation strategy do not show rain gardens, and the swales shown are only identified as “potential”. As a result, the proposal simply relies on piped drainage and large attenuation basins, rather than a surface-level, source-control and multi-functional SuDS network integrated with streets, open space, biodiversity and public realm.
- 6.21.** This is contrary to the spirit of Policy 93 and national SuDS guidance, which prioritises natural, nature-based drainage features, management of runoff close to source, surface-level vegetated systems, and the integration of SuDS with green and blue infrastructure. A landscape-led scheme, as claimed by the Applicant, should have used swales, rain gardens, rainwater harvesting and other source-control features as structuring elements of the layout. The submitted proposal does not demonstrate that this is the case.
- 6.22.** The scale and siting of the proposed attenuation basins also raise concerns. The basins are substantial engineered features and respond solely to storage requirements rather than to the site’s rural character, edge conditions and topography. Their location in sensitive parts of the site, adjacent to open land and woodland, would risk introducing suburban estate infrastructure into a rural-edge context. Furthermore, if the “potential” swales run against the contours, they would not function effectively unless properly aligned with the existing landform. These are not merely reserved matters details; they result from the proposed quantum, developable area and drainage concept now before the Council.
- 6.23.** The FRA also states that rainwater from dwelling roofs would be collected in water butts for landscape irrigation. RPC supports rainwater reuse, but this commitment is currently too weak to attract meaningful weight. If rainwater harvesting forms part of the Applicant’s claimed SuDS response, it should be secured as a clear design parameter and integrated into the architecture, plot design and landscape strategy, rather than left as an incidental add-on at reserved matters stage.
- 6.24.** Overall, RPC considers that the application has not yet demonstrated compliance with Policy 93. The Applicant has not evidenced the dismissal of infiltration, has not shown that higher-priority SuDS options have been maximised, and has not embedded swales, rain gardens or rainwater reuse into the design parameters. A revised, evidence-based and genuinely landscape-led SuDS strategy should therefore be required.

7. Housing mix

- 7.1.** The NPPF expects planning decisions to support the delivery of a sufficient supply of homes, including by meeting an area's identified housing need and providing an appropriate mix of housing types for the local community. This is reflected in BBLP Policies 58S and 59S, which require development to provide an appropriate affordable housing tenure split, a mix of dwelling sizes and types that responds to identified needs, and housing that supports inclusive and accessible communities. The made Renhold Neighbourhood Plan is also directly relevant, as Policy RNP1 supports small-scale housing development of up to 10 units where it meets the specific needs identified in the Housing Needs Survey.
- 7.2.** The most recent and locally specific evidence is the Renhold Housing Needs Survey 2025. This document identifies a modest parish-level need for affordable and market housing: around four affordable homes until 2030, comprising two 2-bedroom shared ownership houses and two 3-bedroom rented homes, and up to five smaller accessible or bungalow-type market homes to meet downsizing needs. Together, the Neighbourhood Plan and Housing Needs Survey evidence point to approximately nine locally justified units. It does not identify a need for 330 dwellings at Salph End, nor does it support a strategic-scale housing estate in the countryside.
- 7.3.** The Applicant proposes up to 330 dwellings, including 99 affordable homes, 231 market homes and 66 bungalows. The indicative mix comprises 35 one-bedroom units, 77 two-bedroom units, 162 three-bedroom units and 56 four-bedroom-plus units. Whilst the Applicant relies on the provision of 20% bungalows as responding to the Neighbourhood Plan and local discussions, the evidence in the Housing Needs Survey is much more limited and specific. It identifies a small need for accessible downsizing accommodation, not 66 bungalows as part of a major, unallocated, market-led residential development. The proposal therefore substantially exceeds both the scale and type of housing need identified in the most recent local evidence. It is not a genuinely needs-led response to the Parish's housing requirements.
- 7.4.** There is also a concern regarding the affordable housing tenure split. Policy 58S requires 30% affordable housing, with 78% of those dwellings provided as social or affordable rented housing and the remaining 22% as other forms of affordable housing. The proposal meets the minimum 30% affordable housing requirement, but the Applicant's suggested tenure split appears to round down the most affordable rented element to 75%, with 25% as affordable home ownership. Whilst the numerical difference may appear small, it is material. Rented affordable housing is the most accessible tenure for many households in housing need, and Policy 58S is clear that a reduced rented proportion should be justified by viability evidence. Unfortunately, no justification has been provided by the Applicant.

- 7.5.** In addition, BBLP Policy 58S requires affordable housing to be integrated with market housing, not readily distinguishable from market housing, and not arranged in clusters exceeding 15 dwellings. The application is in outline form and layout is reserved, but that does not mean this issue can be left entirely unresolved. The Design & Access Statement suggests a single area of bungalows on the eastern side of the site, which could result in clustering affordable homes. The Parameters Plan and the draft heads of terms should provide clear assurance that affordable homes will be tenure-blind, integrated throughout the development, and delivered in policy-compliant clusters. In the absence of that assurance, compliance with Policy 58S has not been demonstrated.
- 7.6.** The proposal also fails to demonstrate compliance with Policy 59S, which requires development to provide a mix of housing that meets the needs of the community, including families, older people, people with disabilities, people requiring specialist accommodation and those with other specific housing needs. For schemes of 100 dwellings or more, Policy 59S also requires specialist housing for people with learning disabilities or mental health needs in accordance with the Council's most up-to-date statement of need. The Applicant has not demonstrated how this requirement would be met. The proposal also falls short of the minimum expectation in the 2021 Local Housing Needs Assessment for 2% of units to be provided as assisted living accommodation in Use Class C2.
- 7.7.** The application is deficient in respect of accessible and adaptable homes. Policy 59S requires a significant proportion of new homes to meet Part M4(2) accessible and adaptable standards, together with an appropriate proportion of Part M4(3) wheelchair-user dwellings across both market and affordable tenures. The Applicant has not explained how many homes would meet Category 2 or Category 3 standards, how these would be distributed by tenure and type, or how this would be secured. This is not simply a reserved matters detail. The principle and quantum of development, the claimed housing benefits, and the inclusive quality of the scheme are all being assessed at outline stage. The Applicant should therefore demonstrate now how the proposal will meet these accessibility requirements.
- 7.8.** Overall, the proposal does not provide a convincing response to the housing needs identified in the made Neighbourhood Plan or the 2025 Housing Needs Survey. It substantially exceeds the scale of local need, does not demonstrate full compliance with Policy 58S in respect of affordable tenure mix and integration, and fails to demonstrate compliance with Policy 59S in respect of specialist, accessible and adaptable housing. The **housing mix** therefore does not provide a basis for supporting the application and should be given **limited weight** in the planning balance.

8. Conclusion

- 8.1.** For the reasons set out in these representations, Renhold Parish Council objects to planning application 26/00724/MAO. The proposal is a substantial, speculative and developer-led extension of residential development into open countryside, outside the Settlement Policy Area and outside any housing allocation. It is not supported by the development plan, including the recently made RNP.
- 8.2.** RPC's objection is principally one of planning principle. The application site lies in the countryside and forms part of the rural setting of Salph End. The proposal would introduce up to 330 dwellings, estate roads, parking, domestic activity, access infrastructure and associated urbanising development into land that currently performs an important role in maintaining the openness, undeveloped character and separation of the local settlement pattern. The development would conflict with Policy 7S of the BBLP and with the spatial strategy of the RNP, including Policies RNP1, RNP2, RNP4, RNP6, RNP7 and RNP9.
- 8.3.** The RNP is central to the determination of this application. It is the most recent and locally specific expression of the development plan for the parish. It does not seek to prevent all housing growth; rather, it supports appropriately scaled, locally needs-led development that responds positively to Renhold's character, landscape, settlement pattern and infrastructure constraints. Any development in the parish should clearly and demonstrably deliver the vision, objectives, policies and guidance in the Neighbourhood Plan. It should not come forward as speculative "anywhere" development on unallocated countryside land.
- 8.4.** The proposal substantially exceeds the level and form of local housing need identified for Renhold, fails to respond to the established linear and shallow settlement pattern of Salph End, and would result in the loss of the Important Green Gap between Salph End and Ravensden Road End. It would also weaken the wider rural transition between Salph End and Bedford, harm the rural experience of public rights of way, including protected views, fail to deliver a convincing green infrastructure-led layout, and give rise to less than substantial harm to the setting of Mowsbury Hill Scheduled Monument. These harms arise from the principle, location, quantum, access strategy and broad parameters of the scheme, and cannot simply be resolved at reserved matters stage.
- 8.5.** RPC also does not accept the Applicant's claim that the site is in a highly sustainable location. Although some walking, cycling and public transport opportunities exist, these do not provide a realistic or robust alternative to private car use for most day-to-day journeys. The existing pedestrian environment is constrained, the proposed footway and cycleway improvements are limited and partly uncertain, and no secured improvement to bus services is proposed. Travel Plan is largely promotional and not a convincing or meaningful strategy capable of changing travel behaviour.

The proposal would therefore be likely to embed car dependency rather than deliver a genuine choice of transport modes.

- 8.6.** The planning benefits identified by the Applicant do not outweigh these harms. RPC acknowledges that housing delivery, including affordable housing, is a positive consideration in the context of housing land supply. However, the proposed housing quantum and mix are not a locally needs-led response to Renhold, and the affordable housing, specialist housing, accessible housing and tenure matters have not been demonstrated to be fully policy compliant. Other claimed benefits, including open space, drainage, highway works, footway works, the landscape buffer, CIL and planning obligations, are largely mitigation or policy compliance rather than benefits. Biodiversity net gain beyond the statutory requirement may attract limited positive weight only if robustly demonstrated and secured.
- 8.7.** In the planning balance, RPC considers that the adverse impacts of granting planning permission would significantly and demonstrably outweigh the limited and moderated benefits of the proposal. The development would conflict with the development plan as a whole, including the recently made Neighbourhood Plan, and would not represent sustainable development when assessed against the NPPF. Therefore, **planning permission should be refused.**
- 8.8.** Without prejudice to RPC's clear objection to the principle of development, if BBC is nevertheless minded to support residential development on this site, RPC considers that the current proposal would require fundamental revision before it could be considered acceptable, on balance. Any revised proposal would need to be demonstrably led by the Renhold Neighbourhood Plan and Design Code, rather than by the current housing quantum. It would need to reduce the scale of development substantially; protect the openness and undeveloped character of the Important Green Gap; provide a more sensitive rural settlement edge; respond to the linear settlement pattern of Salph End; secure a locally appropriate housing mix and affordable housing tenure; deliver meaningful green infrastructure and public rights of way enhancements; and secure robust active travel, public transport and highway mitigation. RPC would be willing to engage constructively with BBC on these matters, but this should not be taken as acceptance of the principle of the current application.