



Appeal Decision

Site visit made on 4 November 2025

by **I A Dyer BSc (Eng) FCIHT**

an Inspector appointed by the Secretary of State

Decision date: 14 November 2025

Appeal Ref: APP/K0235/W/24/3348145

Struttle End Farm, Renhold Road, Ravensden, Bedford MK44 2RH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Mr J Erven and I Want Storage against the decision of Bedford Borough Council.
 - The application reference is 23/02430/M73A.
 - The development proposed is change of use for the stationing of ISO containers for use as a self-storage facility (part retrospective).
 - This decision supersedes that issued on 28 February 2025. That decision on the appeal was quashed by order of the High Court.
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. As indicated above, the original appeal decision on this proposal was quashed following a successful challenge in the High Court. The quashed decision is treated as if it had not been made. Therefore, my role is to redetermine the case rather than to review the previous appeal decision.
3. I have had regard to the previous appeal decision, insofar as it forms a material consideration, but have determined the appeal afresh on its planning merits having regard to current planning policy and practice.
4. The application has been submitted part retrospectively, and at the time of my site visit I saw that part of the development was in situ. I have dealt with the appeal on this basis.
5. The appeal site address has been shown with several alternative road names, namely Renhold Road, Oldways Road and Ravensden Road. Whilst the site location itself is identified on the plans and is not in dispute I have, for the purposes of this appeal used the address shown on the planning application and the Council's decision notice, which is Renhold Road and I have used this name to identify the road as it passes the site. To the south, where it passes through ribbon development, I have referred to the road as "Ravensden Road".
6. Following the Council's determination of the application, a revised version of the National Planning Policy Framework (the Framework) was published on 12 December 2024 and updated on 7 February 2025. The parties have had, during the course of the appeal, the opportunity to comment on those changes. Thus, no party has been prejudiced or caused any injustice by my having regard to the changes to the Framework when determining this appeal.

7. The Council's first and second reasons for refusal, as stated in its Decision Notice of 20 January 2024, set out that the proposal would be contrary to Policy RNP9 of the Ravensden Neighbourhood Development Plan 2030 (2023) (the Neighbourhood Plan). The Council have since confirmed that this policy, which relates to the provision of new community facilities, is not relevant. On the basis of the evidence before me I have no reason to disagree with the Council on this matter, and I have considered the appeal on this basis.

Main Issues

8. The Council has confirmed that, following submission of additional information regarding the parking and manoeuvring of vehicles within the site, its concerns regarding such matters, as set out in its fourth reason for refusal within the Decision Notice, have been addressed to its satisfaction, subject to the inclusion of a suitably worded planning condition to secure the provision of the appropriate parking spaces and turning areas.
9. Having reviewed the evidence before me, I have no reason to disagree with the Council on this matter and so the main issues in this appeal are: -
- Whether the proposal is in a suitable location for its intended use;
 - The effect of the development on the character and appearance of the area; and: -
 - Whether the proposal would achieve safe access for all users.

Reasons

Location

10. The proposal site (the site) lies south-west of the village of Ravensden and takes its principle access from Renhold Road. To the north, west and south of the site lie open fields. There is sporadic development in the surrounding area. To the south the road, identified as Ravensden Road, is fronted on either side by a ribbon of residential development.
11. The site lies on the western side of a small group of buildings, separated from the ribbon development to the south by an open field, which include Struttle End Farm and The Old Farm House. This small group is formed by a mix of agricultural, light industrial and residential buildings.
12. There is no dispute between the parties that the site lies outside of any Urban Area Boundary (UAB) identified within the development plan and is, therefore located in the countryside for planning purposes.
13. The Design Guidance and Codes, Ravensden (2021) (the Design Guidance) within RNDP identifies part of the site as lying within 'Locality 6: Oldways Road/Struttle End' (Locality 6).
14. Oldways Road/Struttle End is identified in the Design Guidance as a rural settlement, a collection of rural buildings and settlement types that includes residential homes and rural businesses. Nonetheless, the area on which the development is located is outside of Oldways Road/Struttle End settlement and is within the countryside.

15. The Council sets out its spatial strategy for the distribution of sustainable growth within the Bedford Borough Council Local Plan 2030 (2020) (the Local Plan). This strategy seeks to locate development where it will have sustainable access to services and facilities, unless there are particular circumstances for a development to be in a particular location. In so doing the spatial strategy accords closely with the aims of the Framework.
16. Policies 3S, and 7S of the Local Plan contribute to this overall strategy and set out how and where sustainable growth is to be delivered. Taken in the round the spatial strategy seeks to balance the need to promote sustainable growth, including the growth of the rural economy, whilst also seeking to conserve and enhance the natural environment and recognise the intrinsic character and beauty of the countryside. Because of this the countryside is subject to more restrictive policies than urban areas.
17. Policy 3S requires all new development to contribute towards the stated objectives and policies of the Plan through a number of specified ways, including maintaining and enhancing Bedford town centre as the preferred location for retail, leisure, visitor economy and office development; safeguarding the intrinsic character of the countryside and the environment and biodiversity within it through the careful management of development to meet local needs whilst supporting the rural economy; and delivering the majority of rural growth through neighbourhood plans.
18. For development in rural areas the Local Plan sets out the distinction between settlements and areas of countryside through defined Settlement Policy Areas (SPAs). The site is not within a defined SPA or within the built form of a Small Settlement.
19. Policy 7S sets out the circumstances under which development can be considered acceptable outside of SPAs and the built form of Small Settlements. The policy sets out several criteria that must be satisfied, criteria (i)-(xiii). Criteria (i)-(v) identify certain types of development that are considered appropriate. The proposal before me does not constitute any of the types of development set out in criteria (i-iv).
20. Criterion (v) relates to development that is in accordance with any Neighbourhood Development Plan which have been 'made' by the Council.
21. Objective 8 of the made Neighbourhood Plan seeks to ensure existing community and employment facilities are protected and new facilities are promoted where possible. The supporting text relating to Objective 8 of the Neighbourhood Plan explains that the support it expresses relates to modest employment related development such as the conversion of surplus farm buildings which could also have a sustainability benefit in reducing the need to travel further to access available facilities.
22. Notwithstanding the qualified support for new employment facilities expressed by Objective 8, no accompanying policy exists that would provide support for this proposal. However, the RNDP does draw attention to Policy 75 of the Local Plan which sets out how proposals for new employment premises in the countryside will be considered. On this basis the neighbourhood Plan does not provide a separate policy. It follows that should the proposal comply with Policy 75 of the Local Plan there would be no conflict with Local Plan Policy 7S criterion (v), and I will return to

this matter below where it will be seen that I find that the proposal fails to satisfy criterion (v).

23. In addition, Policy 7S provides support for development on sites that are well-related to a defined SPA, Small Settlement or the built form of other settlements which satisfies all other criteria, criteria (vi) to (x) set out in the policy. As I have identified above, part of the wider appeal site lies within the Oldways Road/Struttle End rural settlement, and the area identified for the development is directly adjacent. Whilst the development would encroach further into the countryside, I find that the site is well-related to a settlement.
24. Criterion (vi) requires the development to be in response to an identified community need. The appellant identifies that the take up of the containers currently onsite is 94% and has provided a limited number of statutory declarations from clients operating local businesses.
25. The appellants have also provided a list of current customers of the appeal site to supplement a map showing postcode data of clients. However, this does not provide evidence of why availability of alternative facilities elsewhere or why the particular facility has been chosen by them above alternatives. The data shows a wide dispersal of clientele, with a concentration within and in the vicinity of Bedford itself. Many of the clients are closer to alternative storage facilities and thus it would appear that proximity is not the major determining factor in choice of facility. From the evidence provided it has not been demonstrated that the needs of customers could not be satisfied elsewhere, or that there is a local community need for a facility in this particular location.
26. The appellant has submitted a copy of the Self-Storage Annual Report 2025, published by the Self-Storage Association. Whilst this report identifies a continuing need for self-storage, based on various social and economic factors, this is a general need and does not demonstrate a particular local need for the proposal. Further, I note that the general need for self-storage fell during the report period and that the average size of storage facilities is also falling.
27. The appellant has identified that a proposal for an entertainment resort, a project of national significance as well as local, has been made to Government and asserts that this 'will continue to result in a greater need for local self-storage facilities for both business and private users'. The proposal is for a leisure park and, if the application is successful, would be likely to provide economic growth. However, no substantive evidence has been provided to demonstrate that this would lead directly to a local increase in demand for self-storage. I therefore find that criterion (vi) is not satisfied.
28. Criterion (vii) requires the proposal to demonstrate identifiable community support, and that the proposal has been made is or supported by the Parish Council or, where there is no Parish Council, another properly constituted body which represents the local community. The site lies within the designated area of Ravensden Parish, and the Parish Council have written in support of the proposal, subject to the resolution of certain matters through the imposition of planning conditions. During the consultation process on the original application 30 letters of support were received from neighbours. From the evidence before me I find that this satisfies the requirements of this criterion, and the Council has confirmed that it does not consider that there is conflict.

29. The next criterion, (viii), requires the scale of the proposal to serve local needs or to support local facilities. I have no doubt that there is some degree of local need for storage, although this is not quantified or linked to the scale of the proposal. The Council have not identified any conflict with this criterion and, on the basis of the evidence before me, I have no reason to dispute their conclusion in this regard.
30. Having regard to criterion (ix), which requires that the development contributes positively to the character of the settlement and the scheme is appropriate to the structure, form, character and size of the settlement, it will be seen below that I have found no harm.
31. Criterion (x) of Policy 7S, relates specifically to the provision of community buildings. As the proposal before me is not a community building there is no need for compliance with the criterion to comply with Policy 7S.
32. Finally, the policy requires that any proposal would satisfy three final criteria, (xi) to (xiii). It will be seen below that I have found the proposal to appropriately address the recognition of the intrinsic character and beauty of the countryside. The proposal would provide extensive landscaping appropriate to its rural location that would, through the use of native species, reinforce the character of the local rural landscape and provide biodiversity benefits through the provision of native habitat and foraging routes and opportunities. The requirements of criterion (xi) would thereby be satisfied.
33. In a similar way, whilst not interfering with existing access by the public to land, and by screening the proposal to mitigate residual visual harm, the proposal would not give rise to other impacts that would adversely affect the use and enjoyment of the countryside by others, as required by criterion (xii).
34. The proposal provides a biodiversity net gain and there is no evidence before me to suggest that it would have any significant adverse effect on a designated Natura 200 site or otherwise harm biodiversity. It therefore satisfies the requirements of criterion (xiii).
35. Local Plan Policy 75 supports new employment development in the countryside, but this is subject to the fulfilment of certain criteria. Of these criteria, criterion (i) requires that the proposal is within a defined employment area. This criterion is, therefore, not satisfied. There is no substantive evidence before me to demonstrate that the proposal would re-use existing employment land, the requirement of criterion (ii).
36. For criterion (iii) of Policy 75 to be satisfied the development would need to be for the expansion of an established business within its existing operational site. On the basis of the evidence before me, it is my understanding that prior approval has been granted for change of use of agricultural building to flexible uses under Part 3, Class R of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). Whilst there is disagreement between parties as to lawfulness of the B8 use, both parties agree that the operational site is limited to the building itself. I agree with that and so the appeal site would therefore not be within the operational site.
37. Even if the proposal adhered to criteria (v)-(x) of the policy there would be a significant conflict with Policy 75 taken as a whole given the failure to adhere to

criteria (i)-(iv). As there is no support for the proposal provided by Policy 75, criterion (v) of Policy 7S is not satisfied.

38. From the above it will be seen, whilst there is no conflict with some of the criteria of Policy 7S, it does not satisfy them all. Considered against criterion (vi), there is no demonstrable need for the proposal to be in this location, and this goes to the heart of the aims of the policy, and similarly those of Policy 3S, within the overarching Spatial Strategy, to protect the countryside from inappropriate development through the careful management of development to meet local needs.
39. The proposal would harmfully undermine the Council's spatial strategy and thereby its strategic vision for development. A plan-led planning system is fundamental to achieving the government's vision for achieving sustainable development and the harm that I have identified would be on-going.
40. I therefore conclude, in regard to this main issue, that the proposal is not in a suitable location for its intended use because it is contrary to Policies 3S, 7S and 75 of the Local Plan, which together seek, amongst other things, to protect the open countryside from inappropriate development and promote development in sustainable locations.
41. The Council assert within their Decision Notice, in the first reason for refusal, that the proposal is contrary to Policy 65 of the Local Plan. However, Policy 65 relates to the reuse of rural buildings in the countryside. As no buildings would be reused, this policy is not relevant to the consideration of this main issue.

Character and appearance

42. The appellants have provided a Landscape and Visual Statement, dated November 2023, and this provides details of views and visual receptors. The Council acknowledge that the proposed containers are "not prominently visible from the street scene or the wider surrounding countryside". Having visited the site I agree with that summary.
43. The RNDP identifies the site as lying within 'Locality 6: Oldways Road/Struttle End' (Locality 6), characterised as 'a collection of rural buildings and settlement types that includes residential homes and rural businesses'. The RNDP identifies amongst issues to be addressed in Design Codes that for Locality 6 there is a need to retain dispersed character of the area as the spaces between clusters of properties are important to the landscape character.
44. The site is well related to the large cluster of buildings to the south-west where they front Renhold Road, albeit that the containers encroach further into the countryside. However, the spaces between properties and clusters of buildings would not be decreased to any obvious effect by the proposal.
45. Whilst on site I saw other commercial uses lying within the wider open countryside, including a builders' yard in close proximity. The existing and proposed containers would introduce a different commercial operation into the area. However, its operational characteristics would be unlikely to be so different as to be incongruous with other commercial activity in the wider area.
46. Individual containers would be of an overtly industrial appearance. However, such containers are not infrequently used for storage in rural locations, associated with

farming operations and such like. Nonetheless, they are seldom encountered in such large groupings in a rural setting as is proposed.

47. The existing lie of the land and planting already limits longer views into the site, albeit that views of the containers are available from public viewpoints close at hand and further afield. Such views are, however, largely glimpses. Clearer views are available in some locations, such as from Footpath 27, a public footpath, where this crosses open fields to the south of the proposal site, and from Footpath 25 which runs from the south-east of the site, passing to the north. However, the views from Footpath 27 are viewed in context of the existing building group that includes Strutt End Farm, whilst the views of the containers across the valley from Footpath 25 place the site in context of other employment uses, such as the builders' yard. Further, their low profile and colour, which could be effectively controlled through a planning condition, would assist in assimilating them into the view.
48. The appellants propose extensive landscaping of the site and the immediate area to increase screening. Again, this could be controlled through a suitably worded planning condition. The provision of such screening and landscaping would augment the existing to further limit views and assimilate the development into the area, such that the development would not be over-conspicuous when viewed from nearby or further afield.
49. My attention has been drawn by the Council to an appeal decision¹ in regard to the Inspector's approach to mitigation of visual harm through the provision of landscaping, with particular regard to guidance from English Heritage that 'as screening can only mitigate negative impact, rather than removing impacts or providing enhancement, it ought never to be regarded as a substitute for well-designed developments'. This guidance, however, relates to heritage impacts. In the case before me the visual impacts are upon the wider countryside, as experienced from the wider countryside. Whilst, within the site, the character and appearance of the site would be altered, my considerations also relate to how those changes are experienced within the wider environment. Whilst, it is true, that landscaping can, generally, only mitigate, rather than eliminate, harm, in this particular case I consider that the proposed mitigation would, building on the existing baseline and the proposal's effect on the character and appearance of the area, provide amelioration to offset visual harm experienced from further afield.
50. I therefore conclude that, in regard to this main issue, the proposed development would not harm the character and appearance of the area and so there is no conflict with Policies 3S, 7S, 75, 28S, 29 and 30 of the Local Plan in as much as these together seek, amongst other things, to safeguard the intrinsic beauty of the countryside and ensure development is of high design quality and responds positively to the character and context of an area.

Access

51. The proposal would be accessed by an existing track with a junction onto Renhold Road and there is no dispute between the parties that the proposal would increase vehicle movements on this access and through the junction. To accompany the appeal the appellants have submitted an Appeal Statement on Highways and Transport Matters (ASHTM), dated June 2024. This included information gathered

¹ PINS Ref: APP/Z1510/W/21/3277847

from the Trip Rate Information Computer System (TRICS) database and traffic counts using Automated Traffic Counters (ATCs). These ATCs also measured vehicular speeds on Renhold Road. The Council has provided comments on the ASHTM.

52. Renhold Road, is an unlit single carriageway road and is, in the vicinity of the access, subject to a 40MPH speed limit. Further south, as the road enters the more urbanised area fronted by dwellings, this reduces to 30MPH. It has verges of varying width with street furniture, including road signage and statutory undertakers' plant, within them.
53. The appellant, within the ASHTM has provided data from ATCs. ATC1 was located immediately to the north of the access and ATC2 was positioned approximately 120 metres to the south of the site access, at a point close to the decrease in the speed limit on the road to 30MPH.
54. These ATCs calculated that the 85th percentile speed of vehicles approaching the junction, which is used to determine design speed, was 35.4MPH northbound and 40.5 MPH southbound. It is notable, however, that the 85th percentile speed of northbound vehicles that had passed the junction had increased to 38.2MPH at the location of ATC1. This leads me to conclude that vehicles are accelerating towards the site access as they leave the 30MPH speed restriction.
55. There is no dispute between the parties that a satisfactory visibility splay to the north, of 120 metres, can be provided. However, there is dispute regarding the adequacy of the visibility splay to the south.
56. Whilst the appellants query whether the verge on the opposite side of the road to the entrance is within the public highway, no definitive evidence is before me to demonstrate that it is. Consequently, it has not been demonstrated that a splay of 120 metres to the south can be provided within the land identified as public highway or within the control of the appellant.
57. The ASHTM provides two measurements of northbound 85th percentile speed. Both indicate that vehicle speeds are generally lower than the speed limit of 40MPH. The appellants have suggested that it is reasonable to rely on these measurements as a basis for design. At the location of ATC1, this correlates to a speed of 38.2MPH, whilst at ATC2, it is 35.4MPH.
58. The Council argue that the use of the Manual for Streets (MfS) documents is inappropriate for use when considering the access to the proposal as the parameters associated with it do not satisfy their guidance for their use. This relates particularly to the proportion of heavy commercial and public service vehicles (HCVs and PSVs) using Renhold Road, and the speed of traffic.
59. The MfS documents provide safe stopping distances for speeds up to 37 MPH. However, MfS2 also provides formulae for calculating safe stopping distances for speeds above this and provides a means of taking into account the different braking characteristics of HCVs and PSVs within those calculations.
60. Visibility for emerging drivers and for drivers approaching from the south is available at an appropriate setback from a point some 113 metres from the access to the proposed development. This is close to the location of ATC2 where

northbound vehicles are approaching at 35.4MPH, which is under the 37MPH set out in MFS, having recently exited a 30MPH speed limit.

61. The appellants have calculated the safe stopping distances (SSD) for vehicles, accounting for the higher proportion of HCVs and PSVs, at the location of ATC2, where vehicles emerging from the junction or approaching would be visible to each other, as 60 metres. Thus, a driver at this point would be able to react to an emerging vehicle, as would the driver of the emerging vehicle be able to react to a northbound vehicles approach.
62. Further, a similar calculation at the location of ATC1, where vehicle speeds are higher, calculates an SSD of 113 metres. This visibility is available and provides a further degree of surety that vehicles travelling north would be able to see, and be seen by, emerging vehicles, and react appropriately.
63. The Council have referred me to the Bedford Borough Council Visibility Splay Position Statement. This sets out the context that the Council consider appropriate for the application of design guidance contained in MfS and The Design Manual for Roads and Bridges. However, this appears to be a report to the Portfolio Holder, and its status in regard to the development plan or adoption is not set out. In a similar way to the approach taken by the Inspector in previous decisions², to which the appellants have drawn my attention, I have given precedence to national guidance.
64. I therefore conclude that the development would achieve safe access for all users, subject to the imposition of planning conditions to ensure appropriate mitigation, including that frontage growth would be maintained to ensure appropriate visibility splays could be achieved.
65. There is, thus, no conflict with Policy 31 of the Local Plan in as much as this seeks to ensure that development proposals have suitable access arrangements.

Other Matters

66. The appellants identify that the government has advised the Council to withdraw their submitted Local Plan in order that the proposed entertainment resort may be appropriately addressed. However, this appeal must be determined in accordance with planning policy in force at the time of this decision. The Council has an extant development plan and so I have not considered this matter further.

Planning Balance and Conclusion

67. I have found that the proposal would not result in harm to the character and appearance of the area or highway safety but is in conflict with the Development Plan when taken as a whole.
68. The proposal would provide some economic benefits to the rural economy through increased economic activity and the provision of employment. There would be benefit to local biodiversity through the provision of native planting as part of an overarching landscape scheme. Given the scale of the proposal, I attach moderate weight to these public benefits.

² PINS Ref: APP/K0235/W/23/3316321 and APP/K0235/W/24/3338435

69. Nevertheless, I give significant weight to the harm that I have identified as a result of its unsuitable location, which undermines the spatial strategy of the development plan and so the benefits do not, in this case, outweigh the harm
70. The proposal conflicts with the development plan when read as a whole and the material considerations do not indicate that the appeal should be decided other than in accordance with it.

I A Dyer

INSPECTOR