

1. Introduction

1.1. This statement has been prepared by Bromham Neighbourhood Plan Steering Group on behalf of Bromham Parish Council to accompany the Council's submission of the proposed Bromham Neighbourhood Plan to Bedford Borough Council.

1.2. Under Regulation 15(1)(d) of the Neighbourhood Planning (General) Regulations 2012, where a qualifying body submits a plan proposal to the local planning authority, it must include a statement explaining how the proposed neighbourhood plan meets the requirements of paragraph 8 of Schedule 4B of the Town and Country Planning Act (TCPA) 1990.

1.3. Paragraph 8(1) of the TCPA 1990 requires the independent examiner to consider -

- (a) whether the draft neighbourhood plan meets the basic conditions (see sub-paragraph (2)),
- (b) whether the draft plan complies with the provision made by or under sections 61E(2), 61J and 61L,
- (c) whether any period specified under section 61L(2)(b) or (5) is appropriate,
- (d) whether the area for any referendum should extend beyond the neighbourhood area to which the draft plan relates, and
- (e) such other matters as may be prescribed.

1.4. Paragraph 8(2) of the TCPA 1990 states that a draft neighbourhood plan meets the basic conditions if –

- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
- (b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
- (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
- (d) the making of the order contributes to the achievement of sustainable development,
- (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- (f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and

(g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

1.5. Section 2 of this statement deals with the legal requirements of paragraph 8(1)(b)-(e): Section 3 sets out how the draft plan meets the basic conditions as required by paragraphs 8(1)(a) and 8(2).

2. Legal Requirements

2.1. This part of the statement confirms Bromham Parish Council's view that the Bromham Neighbourhood Plan (Submission Version) complies with the requirements of Paragraph 8(1)(b)-(e).

Submission of the neighbourhood plan by a qualifying body

2.2. Bromham Neighbourhood Plan is submitted by Bromham Parish Council, the relevant qualifying body for the designated neighbourhood area.

The Neighbourhood Plan proposal relates to planning matters

2.3. The Neighbourhood Plan contains policies relating to the development and use of land within the neighbourhood area and has been prepared in accordance with the requirements of the the Town and Country Planning Act 1990 and the Neighbourhood Planning (General) Regulations 2012.

The proposed Neighbourhood Plan states the period for which it is to have effect

2.4. The proposed Neighbourhood Plan states at paragraph A.1.4 that the period to which it relates is 2020-2030.

The policies do not relate to excluded development

2.5. The proposed Neighbourhood Plan does not deal with 'county matters' (mineral extraction and waste development), nationally significant infrastructure or any other matters set out in Section 61K of the Town and Country Planning Act 1990.

The proposed Neighbourhood Plan does not relate to more than one Neighbourhood Area and there are no other Neighbourhood Development Plans in place within the Neighbourhood Area

2.6. The designated neighbourhood area was approved by Bedford Borough Council on 8 August 2014. The Plan does not relate to more than one neighbourhood area and there are no other neighbourhood plans in place within the Neighbourhood Plan area.

2.7. In relation to paragraph 8(1)(c), it is not considered that there is any benefit or reason for extending the area for the referendum beyond the designated Neighbourhood Plan Area.

2.8. In relation to paragraph 8(1)(d), there are no other prescribed matters.

3. Basic Conditions

3.1. This part of the statement confirms Bromham Parish Council's view that the Bromham Neighbourhood Plan (Submission Version) meets all of the basic conditions required for a Neighbourhood Plan.

3.2. The National Planning Policy Framework (NPPF), sets out the Government's planning policies for England and how these should be applied. The overarching principle of the NPPF is the 'presumption in favour of sustainable development.' This requires local planning authorities to "positively seek" development opportunities.

3.3. The Planning Practice Guidance (PPG), which supports the NPPF, describes basic conditions that a draft neighbourhood development plan (and/or development order) must meet if it is to proceed to referendum. The basic conditions that apply solely to neighbourhood development plans are, that -

1. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan.
2. the making of the neighbourhood plan contributes to the achievement of sustainable development.
3. the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
4. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
5. prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the plan.

Regard to National Policies and Guidance

3.4. The proposed neighbourhood plan has been developed to reflect the National Planning Policy Framework and Planning Policy Guidance. Table 1 at the end of this document sets out those neighbourhood plan policies which relate to planning issues and which aspects of NPPF and PPG requirements they are intended to reflect.

General conformity with the strategic policies of the development plan for the area

3.5. The proposed Bromham Neighbourhood Plan has been prepared in general conformity with the saved strategic policies of the Bedford Borough Local Plan (2002), the Bedford Core Strategy and Rural Issues Plan (2008) and the Bedford Allocations and Designations Local Plan (2013), which cover the period to 2021. Account has also been taken, where appropriate of the proposed strategic priorities set out in the emerging Bedford Borough Local Plan 2030. Table 1 provides a summary of how each of the Neighbourhood Plan policies are in general conformity with the above policies.

Achieving sustainable development

3.6. The Neighbourhood Plan was developed so as to reflect the NPPF presumption in favour of sustainable development, with its economic, social and environmental dimensions.

3.7. The policies contained in the Neighbourhood Plan contribute to achieving sustainable development by seeking positive improvements to the quality of the natural, built and historic environment, as well as in people's quality of life, including:

- supporting strong, vibrant, healthy and inclusive communities by facilitating the right mix of housing (including affordable housing) to meet local need
- supporting healthy communities through the provision of additional playing fields and recreational facilities easily accessible to both new and existing residents. This area will include a dedicated space for cricket and shared space for rugby, football pitches and a running track, together with Multi-Use Games Area (MUGA) with tennis/netball/basketball courts and so provide good scope for social interaction.
- supporting the transition to a low carbon future through support for sustainable modes of transport, including public transport, renewable energy generation. Sustainable transport has been important in our thinking and the fact that the only regular bus route through the village runs between two sectors of Beauchamp Park and next to Stagsden Rise was an important factor in our thinking.
- protecting and enhancing the distinctive character of the built and natural environment through high quality design, and protection of important local green spaces as well as the creation of some new green spaces with space for nature.
- conserving and enhancing the natural environment by protecting and supporting green spaces in the new developments, with space set aside for wildlife, and more trees with their calming and cleansing effect on the environment.
- Preserving the built heritage of the village and the settings of its more important historic building as well as ensuring that important archaeology on development sites is properly evaluated in conjunction with Bedford Borough Council's Historic Environment Team.
- safeguarding and enhancing existing open space, community facilities and pedestrian and cycling facilities for the health, social and cultural wellbeing of the community.

EU Obligations

(a) Strategic Environmental Assessment

3.8. The Planning Practice Guidance on strategic environmental assessments suggests that, such an assessment is usually only required where either the neighbourhood plan or supplementary planning documents could have significant environmental effects.

3.9. A Screening opinion was issued by Bromham Parish Council which determined that a full SEA would not be required. The statutory consultees concurred with this conclusion.

(b) Habitats Directive

3.10. Any development that has the potential to have an impact upon a European protected site may be subject to a Habitats Regulations Assessment (HRA) submitted by a competent public body, for example the local planning authority. Bromham commissioned an HRA undertaken by a professional ecologist and its recommendations were incorporated into the proposed neighbourhood plan. A copy of the HRA is also presented as a supporting document to the plan.

(c) Convention on Human Rights

3.11. The proposed Neighbourhood Plan has regard to and is compatible with the fundamental rights and freedoms guaranteed under the European Convention on Human Rights. The Neighbourhood Plan has been prepared with extensive input from the community and stakeholders as set out in the accompanying Statement of Consultation. Considerable care was taken throughout the preparation and drafting of this Plan to ensure that the views of the whole community were taken into account to avoid any unintentional negative impacts on particular groups.

3.12. There was extensive consultation and engagement in identifying issues and objectives and the community has been consulted on the draft Neighbourhood Plan, in accordance with Regulation¹⁴ of the Neighbourhood Planning (General) Regulations 2012. Responses have been recorded and changes have been made where appropriate as set out in the consultation statement

3.13. The Statement of Consultation was prepared by the Steering Committee and meets the requirements set out in Paragraph 15 (2) of the Regulations.

Conclusion

3.14. The Basic Conditions as set out in Schedule 4B of the Town and Country Planning Act 1990 are considered to have been met by the Bromham Neighbourhood Plan.

3.15. The Plan has regard to national policy, will contribute towards the achievement of sustainable development, is in general conformity with the saved strategic policies in the Bedford Borough Council's current planning documents and the relevant strategies from the emerging Bedford Local Plan 2030 and meets relevant EU obligations.

Table 1 – Bromham Neighbourhood Plan policies and related provision in the NPPF and Bedford Borough Development Plan

Policy No	Policy title/objective	NPPF para	Regard to National Planning Policy	Conformation with local plan
HA1	Housing allocation – dealing with the allocation of Beauchamp Park, Stagsden Rise and Old Stableyard Development	11, 59, 84 and 117-8	The allocation of sites supports the presumption in favour of sustainable development by contributing to the meeting of housing need of the area in a sustainable way, and helps towards the government's aim, as set out in the NPPF, of significantly boosting the supply of homes. It also reflects, in the Old Stableyard allocation, the NPPF requirement to make as much use as possible of some previously-developed land, as well as using land effectively by locating outdoor sport and recreation facilities in Beauchamp Park in land which would not be as suitable for housing because it is in a higher risk flood zone area.	The allocations would meet the requirement placed on Bromham (and other key service centres) at policy 3S (Spatial strategy) in Bedford Borough Local Plan 2030 Old Stableyard Development, part of the site for which has been previously developed, also accords with policy 46S of Bedford Borough Local Plan 2030, which relates to the use of previously-developed land.
HA2	Planning obligations	54, 55, 56 and 57	The use of planning obligations are supported where they are necessary, related to the development and fairly and reasonably related in scale and kind to the development.	The allocations would satisfy policies 32 and 33 (impact of development), 58S (Affordable Housing), and 86S (Delivering infrastructure) set out in Bedford Borough Local Plan 2030, together with Supplementary Planning Document 'Planning Obligations' adopted in July 2013.
HA3	Housing allocation – requiring proper integration of the new developments with the existing village and beyond,	91, 104 and 110	This policy reflects the NPPF's aim of promoting sustainable transport and giving priority to cyclists, pedestrians and the use of public transport.	This policy accords with the requirements of Bedford Borough Local Plan 2030 at policies 29 (Design quality and principles), 31 (Impact of development – access impacts) 53(i) (Development layout and accessibility) and 87

	giving primacy to pedestrians, cyclists and, where appropriate, bus users			(Public Transport). Policies AD36 (Pedestrians) and AD39 (Cyclists) of the Allocations and Designations Local Plan 2013, which have been saved, also underpin this policy.
HA4	Windfall sites – dealing with location, access and adverse impact on amenity,	68, 70	These policies support the scope for windfall developments, subject to them meeting wider planning requirements. They also reflect the NPPF concern about inappropriate development in residential gardens with its potential to harm local amenity.	These policies accord with the requirements of Bedford Borough Local Plan 2030 at policies 29 (Design quality and principles), 31 (Impact of development – access impacts), 33 (Impact of development – disturbance and pollution), 53(i) Development layout and accessibility) 87 (Public Transport), 92 (Flood risk) and 93 (Sustainable drainage systems).
HE5	Windfall sites - addressing flood risk, drainage and potential environmental impacts.			
AH1	Affordable housing – requiring developers to comply with the affordable housing policy of Bedford Borough Council at the time of any application.	34, 62, 63	These policies support the provision of affordable housing at all three allocated sites, and specify the types of housing required in relation to the size of the site. This is consistent with the NPPF which supports affordable housing where a need is demonstrated.	Bedford Borough Local Plan 2030 sets out its requirements for percentages, tenures and size-mix of affordable housing in Policy 58S. These neighbourhood plan policies cite the Local Plan affordable housing policy as underpinning the requirement.
AH2	Affordable housing – each site to meet the housing mix requirements relating to the size of site.			
BP	Beauchamp Park - site specific policies			
	BP1 - allocates the site	11, 59	As per policy AH1above	This policy contributes to meeting Bedford Borough Local Plan 2030 Policy 3S (Spatial strategy).
	BP2 - defines the housing-mix related to affordable housing and reflects the outcome of a Housing Needs Survey for Bromham.	62	This policy reflects the NPPF requirement to specify housing mix for affordable housing.	This policy conforms to policy 58S of Bedford Borough Local Plan 2030 relating to affordable housing.

	BP3 – prohibits housing above two stories high	28	This is a design principle that reflects local concerns but accords with the NPPF's promotion of more specific policies at a non-strategic level	This policy accords with the requirements of Bedford Borough Local Plan 2030 at policy 29 (Design quality and principles) in relation to scale and height of development.
	BP4 – provides for sports and recreation facilities in the site	91, 92, 96, 117-8	This policy reflects the NPPF's promotion of safe and healthy communities, and also reflects the requirement to make effective use of land.	This policy accords with the requirements of the Bedford Borough Allocations and Designations Plan 2013 at saved policy AD28 (Provision of open space and built facilities in association with new development) and the adopted Open Space Supplementary Planning Document (2013). The facilities provided under this policy should also conform to policy 97 (New sports and leisure facilities) in Bedford Borough Local Plan 2030.
	BP5 – provides for green spaces, including some space for wildlife	28	This policy reflects the NPPF encouragement to set local policies on issues such as enhancing the natural environment.	This policy accords with policy 28S of Bedford Borough Local Plan 2030 deals with the provision of green spaces as part of place-making. Saved Policy AD28 of the Allocations and Designations Local Plan 2013 is also relevant in this context as is the adopted Open Space Supplementary Planning Document (2013).
	BP6 – requires compliance with sustainable drainage and flood risk requirements.	155, 165	This policy complies with the NPPF requirement relating to flood risk and has directed built development away from areas of highest risk, and that major developments should incorporate sustainable drainage systems	These policies comply with policies 92 (flood risk) and 93 (sustainable drainage) in Bedford Borough Local Plan 2030.
	BP7 – requires consideration to be given to a shop unit to be built on the	83, 91-2	This policy would support the NPPF's promotion of sustainable economic growth	This policy takes account of Policy 84 (Shop units) of the Bedford Borough Local Plan 2030.

	development if demand to take on such a unit can be demonstrated		in rural areas and the development of local services together with safe and healthy communities and contribute to encouraging sustainability.	
	BP8 – requires sightlines to be improved at the junction of Stagsden Road and the A428.	28	This policy reflects the NPPF encouragement to set local policies on issues such as design principles.	This policy accords with Policy 31 (The impact of development - access impacts) of Bedford Borough Local Plan 2030.
	BP9 – requires a programme of evaluation and mitigation in relation to historic assets on the site.	28	This policy reflects the importance the NPPF attaches to preserving the historic environment by ensuring proper engagement with the Bedford Borough Council Historic Environment Team	This policy would ensure that any development complies with policy 41S relating to the historic environment and heritage assets in the emerging Bedford Borough Local Plan 2030.
	BP10 – sets out broad design principles for the development	28	This policy reflects the NPPF encouragement to set local policies on issues such as design principles.	This policy conforms with Bedford Borough Local Plan 2030 policies 30 (Design quality and impacts), 51S (Climate change strategic approach), 54 (Energy efficiency), 55 (District heating), 57 (Renewable energy – general impact), 29 (Design quality and principles), 31 (Impact of development – access impacts). It also conforms to saved policy AD28 (Provision of Open Space and Built facilities in association with new development) from the Allocations and Designations Plan 2013.
SR	Stagsden Rise - site specific policies			

	SR1 - allocates the site	11, 59	As per policy AH1 above	This policy contributes to meeting Bedford Borough Local Plan 2030 Policy 3S(Spatial strategy).
	SR2 - defines the housing mix related to affordable housing and to reflect the outcome of a Housing Needs Survey	62	This policy reflects the NPPF requirement to specify housing mix for affordable housing	This policy conforms to policy 58S of Bedford Borough Local Plan 2030 relation to affordable housing.
	SR3 – prohibits housing above two stories high	28	This is a design principle that reflects local concerns but accords with the NPPF’s promotion of more specific policies at a non-strategic level.	This policy accords with the requirements of Bedford Borough Local Plan 2030 at policy 29 (Design quality and principles) in relation to scale and height of development.
	SR4 – requires the provision of a new public green open space including a play area	28	This policy reflects the NPPF encouragement to set local policies on issues such as green space.	This policy accords with the requirements of the Bedford Borough Allocations and Designations Plan 2013 at saved policy AD28 (Provision of open space and built facilities in association with new development) and the adopted Open Space Supplementary Planning Document (2013). The facilities provided under this policy would also accord with policy 28S of Bedford Borough Local Plan 2030, which deals with the provision of green spaces as part of place-making.
	SR5 – requires compliance with sustainable drainage and flood risk requirements.	155 -165	The priorities that are most relevant to Bromham are currently set out in the saved policies of the Bedford Borough Local Plan (2002), the Bedford Core Strategy and Rural Issues Plan (2008) and the Bedford Allocations and Designations Local Plan (2013), which cover the period to 2021. Account must also be taken of the	These policies comply with policies 92 (flood risk) and 93 (sustainable drainage) in Bedford Borough Local Plan 2030.

			proposed strategic priorities set out in the emerging Bedford Borough Local Plan 2030.	
	SR6 – requires a safe crossing point across Stagsden Road for pedestrians (and cyclists) to link with the existing bus stops.	91	The aim of this policy is to create a safe environment for pedestrians and cyclists and safe access for users of public transport as promoted in the NPPF	This policy accords with the requirements of Bedford Borough Local Plan 2030 at policies 31 (The impact of development - access impacts) and 53 (i) (Development layout and accessibility). Saved policies 36 (Pedestrians) and 39 (Cyclists) of the Allocations and Designations Local Plan 2013, also underpin this policy.
	SR7 – prohibits motor vehicle access to the development from New Road or Lime Close other than for emergency vehicles	124, 125, 127 and 130	These policies promote good design and a clear vision for new developments to provide clarity about expectations for developers.	This policy accords with the requirements of Bedford Borough Local Plan 2030 at policies 31 (The impact of development - access impacts) and 53 (i) (Development layout and accessibility).
	SR8 – prohibits construction traffic access to the development from New Road or Lime Close	124, 125, 127 and 130	These policies promote good design and a clear vision for new developments to provide clarity about expectations for developers.	This policy accords with the requirements of Bedford Borough Local Plan 2030 at policies 31 (The impact of development - access impacts) and 53 (i) (Development layout and accessibility).
	SR9 - sets out broad design principles for the development	28	This policy reflects the NPPF encouragement to set local policies on issues such as design principles	This policy conforms with Bedford Borough Local Plan 2030 policies 30 (Design quality and impacts), 51S (Climate change strategic approach), 54 (Energy efficiency), 55 (District heating), 57 (Renewable energy – general impact), 29 (Design quality and principles), 31 (Impact of development – access impacts). It also conforms to saved policy AD28 (Provision of Open Space and Built facilities in association with new development) from the Allocations and Designations Plan 2013.

OS	Old Stableyard Development - site specific policies			
	OS1 - allocates the site	11, 59, 84 and 117	As per policy AH1 above but also reflects the NPPF requirement to make use of previously-developed land.	Contributes to meeting Bedford Borough Local Plan 2030 policies 3S (Spatial strategy) and policy 46S, relating to the use of previously-developed land.
	OS2 - defines the housing mix related to affordable housing and to reflect the outcome of a Housing Needs Survey	62	This policy reflects the NPPF requirement to specify housing mix for affordable housing.	This policy conforms to policy 58S of Bedford Borough Local Plan 2030 in relation to affordable housing.
	OS3 – prohibits housing above two stories high	28	This is a design principle that reflects local concerns but accords with the NPPF’s promotion of more specific policies at a non-strategic level	This policy accords with the requirements of Bedford Borough Local Plan 2030 at policy 29 (Design quality and principles) in relation to scale and height of development.
	OS4 – requires the provision of a cycle and footpath between the development and village through Bromham Park Estates land.	91	This policy reflects the NPPF’s promotion of safe and healthy communities by providing safe pedestrian and cycle routes.	This policy accords with the requirements of Bedford Borough Local Plan 2030 at policy 53 (i) (Development layout and accessibility).. Saved policies 36 (Pedestrians) and 39 (Cyclists) of the Allocations and Designations Local Plan 2013 also underpin this policy.
	OS5 - requires the provision of a new public green open space.	28	This policy reflects the NPPF encouragement to set local policies on issues such as green space.	This policy accords with policy 28S of Bedford Borough Local Plan 2030, which deals with the provision of Green spaces as part of place making. Saved policy AD28 of the Allocations and Designations Local Plan 2013 is also relevant in this context.

	OS6 – requires compliance with sustainable drainage and flood risk requirements as necessary.	155, 165	The priorities that are most relevant to Bromham are currently set out in the saved policies of the Bedford Borough Local Plan (2002), the Bedford Core Strategy and Rural Issues Plan (2008) and the Bedford Allocations and Designations Local Plan (2013), which cover the period to 2021. Account must also be taken of the proposed strategic priorities set out in the emerging Bedford Borough Local Plan 2030.	These policies comply with policies 92 (flood risk) and 93 (sustainable drainage) in the emerging Bedford Borough Local Plan 2030.
	OS7 – requires a programme of evaluation and mitigation in relation to historic assets on the site.	28	This policy reflects the importance the NPPF attaches to preserving the historic environment by ensuring proper engagement with the Bedford Borough Council Historic Environment Team	This policy would ensure that any development complies with policy 41S of Bedford Borough Local Plan 2030 relating to the historic environment and heritage assets.
	OS8 - sets out broad design principles for the development	28	This policy reflects the NPPF encouragement to set local policies on issues such as design principles	This policy conforms with Bedford Borough Local Plan 2030 policies 30 (Design quality and impacts), 51S (Climate change strategic solution), 54 (Energy efficiency), 55 (District heating), 57 (Renewable energy – general impact), 29 (Design quality and principles), 31 (Impact of development – access impacts). It also conforms to saved policy AD28 (Provision of Open Space and Built facilities in association with new development) from the Allocations and Designations Plan 2013.

