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Report on Bletsoe Neighbourhood Plan 2017-2035

An Examination undertaken for Bedford Borough Council with the support of Bletsoe Parish Council on the August 2019 submission version of the Plan.

Independent Examiner: Wendy J Burden BA(Hons) DipTP MRTPI

Date of Report: 11 March 2020

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Contents

	Page
Main Findings - Executive Summary	4
1. Introduction and Background	4
• Bletsoe Neighbourhood Plan 2017-2035	4
• The Independent Examiner	5
• The Scope of the Examination	5
• The Basic Conditions	6
2. Approach to the Examination	7
• Planning Policy Context	7
• Submitted Documents	8
• Site Visit	8
• Written Representations with or without Public Hearing	8
• Modifications	9
3. Procedural Compliance and Human Rights	9
• Qualifying Body and Neighbourhood Plan Area	9
• Plan Period	9
• Neighbourhood Plan Preparation and Consultation	9
• Development and Use of Land	10
• Excluded Development	10
• Human Rights	11
4. Compliance with the Basic Conditions	11
• EU Obligations	11
• Main Issues	12
• General Issues of Compliance of the Plan as a whole	12
- Regard to National Policy and Advice	12
- Contributes to the Achievement of Sustainable Development	13
- General Conformity with Strategic Policies in the Development Plan	13
• Specific Issues of Compliance of the Plan Policies	14
- Housing and Design	14
- Parking and Transport	15
- Local Green Space	16
- Facilities and Services	16
• Non Policy Actions	17
• Factual and Minor Updates	17
5. Conclusions	17
• Summary	17
• The Referendum and its Area	17
• Overview	18

Main Findings - Executive Summary

From my examination of the Bletsoe Neighbourhood Plan (the Plan/BNP) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body (QB) – Bletsoe Parish Council;
- The Plan has been prepared for an area properly designated – the Parish of Bletsoe as shown on Map A on page 6 of the Neighbourhood Plan;
- The Plan specifies the period to which it is to take effect – 2017-2035; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to Referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Bletsoe Neighbourhood Plan 2017-2035

- 1.1 The Neighbourhood Plan Area covers the Parish of Bletsoe, which is located within Bedford Borough Council (BBC) and encompasses the historic village of Bletsoe and its rural setting. Bletsoe lies in a long settled river valley landscape six miles north of Bedford, and the village is likely to have originated as a late Saxon manor reorganised in the mid 11th century by the Norman conquerors. It later became an estate village with rows of 18th and 19th century cottages constructed to house the workers. Bletsoe Castle was the birthplace of Margaret Beaufort, the mother of King Henry VII and is the most imposing building within the village. The estate was sold in the 1950s and the population count in the 2011 census indicates that Bletsoe has some 260 residents.
- 1.2 The village has an elongated triangular form arranged around the central open spaces. The main road from the A6 (The Avenue) runs along one side of the former Great Green and rises towards the parish church of St Mary. Beyond it are the Old Rectory and Bletsoe Castle, which lies to the east of the main road.

- 1.3 Most of the historic village lies within the Conservation Area boundary where there are a number of listed buildings. It includes the Tudor/Stuart garden earthworks which form part of the setting of the Castle. The two most significant spaces within the Conservation Area are the former Great Green around which the village is arranged and the village field, for itself and for the views of the parish church from the south east.
- 1.4 The preparation of the BNP coincided with the emergence of the Bedford Borough Local Plan 2030 (BBLP 2030). The BBLP 2030 was adopted by BBC on the 15 January 2020. The BNP was prepared in accordance with the several different BBC development plan documents which had effect in 2019. Nevertheless, having regard to advice in national guidance, efforts have been made to minimise conflict between the draft BNP policies and those policies that were emerging in the preparation of the BBLP 2030.¹
- 1.5 The Bletsoe Neighbourhood Plan is required to be in general conformity with the strategic policies of the statutory development plan, which is now the BBLP 2030 together with any policies saved from earlier documents. At my request, Appendix C to the BNP has been updated to demonstrate the links between the policies of the BNP with those of the new Local Plan. I address the matter of general conformity of the BNP with the strategic policies of the Development Plan throughout my report.

The Independent Examiner

- 1.6 As the Plan has now reached the examination stage, I have been appointed as the examiner of the BNP by BBC, with the agreement of Bletsoe Parish Council (BPC).
- 1.7 I am a chartered town planner and partially retired government Planning Inspector, with more than 40 years of experience in the private and public sectors. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.8 As the independent examiner I am required to produce this report and recommend either:
 - (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

¹ PPG Reference ID: 41-009-20190509.

1.9 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended)('the 1990 Act'). The examiner must consider:

- Whether the Plan meets the Basic Conditions;
- Whether the Plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development';
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;
 - whether the referendum boundary should be extended beyond the designated area, should the Plan proceed to referendum; and
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').

1.10 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.11 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;

- Be compatible with and not breach European Union (EU) obligations; and
- Meet prescribed conditions and comply with prescribed matters.

1.12 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.²

2. Approach to the Examination

Planning Policy Context

2.1 At the time of the preparation of the BNP, the Development Plan for BBC, not including documents relating to excluded minerals and waste development, comprised the following documents:

- Saved Local Plan 2002 (LP 2002) policies
- The Core Strategy and Rural Issues Plan (CSRI) 2008 (to 2021)
- The Allocations and Designations Local Plan (ADLP) 2013

2.2 The BNP was prepared to be in general conformity with the strategic policies in these BBC development plan documents, which had effect in 2019. Nevertheless, the BPC sought to minimise conflict with the policies emerging in the preparation of the BBLP 2030 during the preparation of the BNP. The BBLP 2030 was adopted by BBC on the 15 January 2020 and largely replaces the policies in the LP 2002 and the CSRI 2008. It does not replace some policies in the ADLP, which remain a part of the Development Plan.³ Although the BNP covers a longer period than the adopted BBLP, I do not consider this in itself breaches the general conformity requirement, and both plans are likely to be subject to review before 2030.

2.3 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 19 February 2019 and has been subject to further amendment. All references in this report are to the 2019 NPPF and its accompanying PPG.⁴

² This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

³ See BBLP 2030 Appendix 1.

⁴ See paragraph 214 of the NPPF. The Plan was submitted under Regulation 15 to the local planning authority after 24 January 2019.

Submitted Documents

- 2.4 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the draft Bletsoe Neighbourhood Plan 2017-2035, August 2019;
 - Map A on page 6 of the Plan, which identifies the area to which the proposed Neighbourhood Development Plan relates;
 - the Consultation Statement, November 2019;
 - the Basic Conditions Statement, August 2019;
 - all the representations that have been made in accordance with the Regulation 16 consultation;
 - the Strategic Environmental Assessment Report prepared by BPC, June 2019;
 - the Bletsoe Neighbourhood Plan Habitats Regulations Assessment prepared by Bodsey Ecology Limited, June 2019;
 - Sites Assessments Report, August 2016;
 - Captains Close Transport Assessment, May 2019;
 - The Avenue Transport Assessment, March 2019; and
 - the request for additional clarification sought in my letter of 30 January 2020 and the responses from BBC and the QB of 13 February 2020.

All the above documents are available on the Borough Council's website.⁵

Site Visit

- 2.5 I visited the Neighbourhood Plan Area unaccompanied by any interested party on the 18-19 February 2020. I carried out a general review of the area in terms of its setting and character in order to familiarise myself with it and visited relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

- 2.6 This examination has been dealt with by written representations. There were no requests to be heard in representations received as a result of the Regulation 16 Consultation.
- 2.7 The Regulation 16 consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum. I have received further clarification from both BBC and the QB in response to my letter of the 30 January 2020. As a result, in terms of the appropriate level of scrutiny for the BNP, I consider hearing sessions to be unnecessary. I have carried out the examination on the basis of the written submissions.

⁵ View at: <https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/neighbourhood-planning/Bletsoe-neighbourhood-development-plan/>

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Modifications

- 2.8 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Bletsoe Neighbourhood Plan has been prepared and submitted for examination by BPC, which is the QB for an area that was designated by BBC on 1 July 2013.
- 3.2 It is the only Neighbourhood Plan for Bletsoe Parish and does not relate to any land outside the designated Neighbourhood Plan Area.

Plan Period

- 3.3 The Plan specifies clearly the period to which it is to take effect in paragraph 1.1, which is from 2017 to 2035. For the purposes of clarity, the Plan should state the date prominently on the front cover (**PM1**).

Neighbourhood Plan Preparation and Consultation

- 3.4 The Bletsoe Neighbourhood Plan Steering Group (BNPSG) was set up in July 2013 comprising residents and Parish Councillors to assist in the preparation of the BNP, reporting to the BPC. A launch event was held for the preparation of the BNP in the Village Hall on 25 September 2014, following which some 70 consultation responses were received. There were also some 32 responses to the neighbourhood questionnaire.
- 3.5 An early version of the vision and objectives for the BNP were made available on the BNP website and an updated Issues and Options Document was the subject of consultation in September 2016. This included a detailed and independent assessment of the sites within BPC put forward as a result of the BBC "Call for Sites" exercise.
- 3.6 Some 80 consultation responses were received, which indicated overwhelming support for the Vision Statement. In terms of locations for growth (and in the context of limited growth), the preferred sites and scale of development were:
- Land behind Captains Close, via existing access adjacent to garages (site identified for up to 8 dwellings to meet local need);
 - The First Field, The Avenue, for 3 dwellings with associated "gateway" improvements. There was no convincing support for an alternative development of 8 homes on this site; and

- Land North of the Old Rectory, for 3 dwellings subject to achieving a layout and design satisfactorily integrated into the landscape setting of the village.
- 3.7 Particular concern was expressed in regard to the need to maintain the character of the approaches to the village from the north and the west, whilst positive support was expressed for the inclusion of a Village Design Statement, for the protection of existing green space and for traffic management improvements including the provision of new off-street parking. Strong support was also expressed for the provision of allotments, for environmental improvements, for the protection and improvement of local facilities and services and for the identification of local heritage assets to be protected from harmful change. The community's responses to the consultations provided the basis for the development of the objectives for the BNP.
- 3.8 The Regulation 14 pre-submission consultation took place over a six week period from 15 September to 31 October 2018. This comprised the delivery of newsletters to every household, hard copies of the draft BNP made available in the Village Hall and through members of the BNPSG, notices were displayed throughout the village and a notice and link to the Plan was added to the website.
- 3.9 Some 70 responses were received from a mixture of local residents, landowners and other stakeholders. Issues raised at Regulation 14 stage were considered by the BNPSG and final amendments to the BNP and its policies were made to produce the Submission Version of the BNP. These included the deletion of the site at First Field, The Avenue, since it was considered to be an important area of undeveloped space separating the built edge of the village from the A6 on the western fringe of Bletsoe.
- 3.10 The Submission Version of the Plan was then the subject of a further round of consultation, as required by Regulation 16 of the 2012 Regulations, which commenced on 27 November 2019 and closed on 19 January 2020. This led to 8 responses all of which I have had regard to in preparing this report. I am satisfied that a transparent, fair and inclusive consultation process has been followed for the BNP. Advice in the PPG on plan preparation has been followed and the BNP is procedurally compliant in accordance with the legal requirements.

Development and Use of Land

- 3.11 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

Excluded Development

- 3.12 The Plan does not include provisions and policies for 'excluded development'.

Human Rights

- 3.13 No issues have been raised in relation to any potential for a breach of Human Rights (within the meaning of the Human Rights Act 1998). From my independent assessment, I see no reason to find otherwise.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The BNP was screened for Strategic Environmental Assessment (SEA) by BBC. It was then identified by Historic England that SEA was necessary due to potential impacts on the Scheduled Monument at Bletsoe Castle from a housing allocation. The SEA was published by BPC in June 2019.
- 4.2 To enable the environmental assessment of the BNP, three objectives were selected and were subject to consultation with Statutory Consultees. The objectives cover housing; landscape and biodiversity; and historic environment. The objective of the BNP for housing is to plan for small scale growth, providing it avoids harm to the historic and rural character of the village. This was assessed in the SEA as having a neutral environmental impact, with a small number of positive effects and the potential for a small number of negative effects.
- 4.3 In terms of the objectives relating to landscape and biodiversity and historic environment, the proposed policies are assessed as having some positive effects as they seek to prevent development that is out of scale and keeping with the character of the setting of the village. The introduction of "Non-Policy Actions" is also assessed as having positive effects as they seek to ensure the BPC continues to work with residents and other relevant bodies to realise the aspirations of the community, wherever possible.
- 4.4 In the selection of the allocated sites, alternative sites around the village were assessed through the Site Assessments Report. The sites proposed in the BNP were assessed to be the most suitable for allocation. The outcome of the community consultation was also an important consideration in the final choice of sites considered acceptable for allocation in the BNP. I am satisfied that reasonable alternatives have been considered in the preparation of the BNP and the SEA.
- 4.5 The conclusion of the SEA is that the effects of the BNP are generally neutral and positive, and occasionally negative. I agree with the findings of the SEA. The mitigation measures proposed in the policies combined with the application of national and BBC Development Plan policies in the determination of development applications should effectively mitigate the negative effects. Furthermore, the scale and location of the proposals in the BNP are such that there should be little or no cumulative harmful

impacts on the objectives or the policies contained in any emerging neighbourhood plans in the adjoining Parishes.

- 4.6 The BNP was further screened for Habitats Regulations Assessment (HRA). This assessed the potential for likely significant effects on two European sites, the Ouse Washes Special Area of Conservation/Special Protection Area/Ramsar and Portholme Special Area of Conservation, which were identified in the HRA for the BBLP 2030.
- 4.7 Screening of the BNP identified no likely significant effects on the two European sites. Appropriate assessment (AA Stages 2 and 3) was therefore not necessary. The HRA concludes that the Bletsoe Neighbourhood Plan can proceed, as it will not have adverse impacts on any European sites, the qualifying features and/or the integrity of those sites, itself or in combination with other plans that have currently been adopted.
- 4.8 I have read the HRA and have no reason to disagree with this conclusion.

Main Issues

- 4.9 I have approached the assessment of compliance of the BNP with the remaining Basic Conditions as two main matters:
- General issues of compliance of the Plan, as a whole; and
 - Specific issues of compliance of the Plan policies.

General Issues of Compliance of the Plan as a whole

Regard to National Policy and Advice

- 4.10 The BNP sets out the background and context to its preparation and provides a broad description of the character and appearance of the Plan area, with its attractive village and rural setting. Aspirations for sustainable development for Bletsoe and the vision and objectives of the BNP are clearly identified. These are underpinned throughout the BNP by the interdependent and overarching objectives of sustainable development, in accordance with national policy.
- 4.11 The policies of the BNP cover four topic areas, which relate to four of the objectives. The fifth objective deals with listed buildings and scheduled monuments and includes a Non Policy Action, rather than a policy. The policy topic areas are:
- 1) Housing and Design (BNP1, 2, 3 and 4)
 - 2) Parking and Transport (BNP5 and 6)
 - 3) Local Green Space (BNP7)
 - 4) Facilities and Services (BNP8)
- 4.12 Although Bletsoe is not identified as a village which should contribute to the development requirements of BBC as a whole, the BNP seeks to provide for the local housing need identified through a Housing Needs

Study in 2015. By taking a positive approach to development in the allocations and policies proposed in the BNP, the local community can influence the type, design, location and mix of new development in accordance with national and local plan policies. In consequence, the BNP has been prepared with full regard to national policy and advice.

Contributes to the Achievement of Sustainable Development

- 4.13 Through the integration of sustainable development objectives within the policies and proposals of the BNP, the Plan has regard to national policies and advice for the achievement of sustainable development.
- 4.14 Within the BNP Vision, five objectives have evolved through a high level of community involvement and relate clearly to the particular circumstances and characteristics of the Neighbourhood Plan Area. Although they do not specifically articulate the three objectives of sustainable development⁶, those objectives underpin the objectives of the Vision. The Plan then identifies each of the objectives as a main heading and sets out an explanation, together with relevant policies designed to meet each objective.
- 4.15 The BNP accords with paragraph 29 of the NPPF since it does not promote less development than set out in the strategic policies for the area or undermine those strategic policies. Subject to the detailed comments and modifications which I set out below for individual policies, I am satisfied that the Plan makes a positive contribution to the achievement of the economic, social and environmental aspects of sustainable development.

General Conformity with Strategic Policies in the Development Plan

- 4.16 I set out the planning policy context for the BNP in section 2 above. In order to clarify the relationship between the BNP and the newly adopted BBLP 2030, I requested that Appendix C to the BNP be updated to indicate the extent to which the policies as submitted in the BNP August 2019 were in accord with those in the newly adopted BBLP 2030.
- 4.17 In paragraph 1.5 of the BNP, the emergence of the new BBLP 2030 is acknowledged and it is stated that once the new Local plan is in place the adopted BNP will need to be reviewed to ensure it remains broadly in compliance with the LP. However, I have reviewed the relationship between the BNP as submitted and the BBC Development Plan as now adopted. I consider that some modification to policies is required in order to secure general conformity between the BNP and the strategic policies of the BBLP 2030 and I deal with these later in my report. With those modifications, I consider that the BNP will be in general conformity with the strategic policies of the newly adopted Development Plan.

⁶ NPPF paragraph 8 a) b) c).

- 4.18 To demonstrate the areas of general conformity with strategic policies in the ADLP and the BBLP 2030, I recommend that Appendix C should be replaced in the BNP with the version which I received on the 13 February 2020. I also recommend the text within brackets underneath each individual policy which identifies 'Compliance' with development plan policies should also be updated to reflect the current Development Plan [PM2].
- 4.19 The BNP has been developed with proper regard to the strategic direction and policies of the BBC development plan documents which I identify in Section 2 above. In addition, with some modifications which I recommend below, the BNP demonstrates general conformity with the recently adopted strategic policies of the BBLP 2030. BBC has been involved throughout the preparation of the BNP and is generally supportive of its policies. Subject to some detailed comments and the modifications which I make to the Plan's policies below, I am satisfied that the BNP is in general conformity with the strategic policies of the Development Plan.

Specific Issues of Compliance of the Plan Policies

Housing and Design

- 4.20 In the BBLP 2030, Policy 4S identifies the locations and settlements which are required to allocate sites for residential development to meet the housing requirement for the Council area. Bletsoe is not included within the list of settlements within this policy and there is no specified level of residential development to be accommodated within the village. However, it is stated in text (paragraph 6.19) that "*some modest development may be appropriate in such locations to help maintain the social and economic viability of these settlements provided that it is consistent with other policies in the development plan*".
- 4.21 The village is within the rural area and has a defined Settlement Policy Area (SPA). In the BBLP 2030, Policy 5S provides for development within the SPA for villages such as Bletsoe, whilst Policy 7S applies to development outside the defined SPA.
- 4.22 Whilst there is no requirement in the BBLP 2030 for new residential allocations within Bletsoe, the first objective for the BNP is to deliver housing which sustains the current and meets the future needs of the community. This objective is in accordance with the NPPF at paragraph 14b) which requires a neighbourhood plan to meet its identified housing requirement, and with the BBLP 2030 at paragraph 6.19.
- 4.23 To achieve the objective, local housing need has been established by commissioning a housing needs survey in 2015. Detailed site assessments were then undertaken to help in determining the preferred locations for growth, having regard to planning policy issues of site availability, suitability and deliverability and, in neighbourhood planning terms,

community acceptability. As a result, two sites are allocated for residential development within the BNP.

- 4.24 In addition to the site allocations, BNP Policy 1 sets out General Development Principles for development within and without the SPA. When considered against the recently adopted BBLP 2030, the submitted BNP policy is more restrictive in its wording than Policy 7S in the BBLP. No justification has been put forward for this more restrictive approach and therefore some modification is required for it to align with the new Local Plan. To ensure that BNP Policy 1 does generally conform with the strategic BBLP Policy S7, I propose a modification to that part of the policy relating to development outside the defined SPA [**PM3**].
- 4.25 The site allocations are made through BNP Policies 2 and 3. I have indicated in paragraph 4.4 above that I am satisfied that the process of selection to identify these sites was soundly based. Having regard to the evidence submitted for the examination, I am satisfied that the sites are appropriately located and capable of being developed within the Neighbourhood Plan period.
- 4.26 There is a need for some additions to the policies to address concerns raised by Anglian Water Authority in the Regulation 16 consultation and to ensure that the site allocation policies accord with Policy 93 of the BBLP 2030 [**PM 4 & 5**]. For the same reason, I also recommend some additions to BNP Policy 4 [**PM 6**]. The modifications will ensure that the sites allocated in BNP Policies 2 and 3, together with the design criteria in BNP Policy 4, provide for the use of sustainable drainage systems in new developments where appropriate and ensure that opportunities to improve water quality, amenity and biodiversity benefits are realised.
- 4.27 BNP Policy 4 is supported by Appendix B to the BNP which provides advice on design for new development within the village. Appendix B clearly states that the Village Design Guide is advisory and not prescriptive and, as such, it raises no issues of compliance with the Basic Conditions.
- 4.28 With the proposed modifications, BNP Policies 1- 4 meet the Basic Conditions.

Parking and Transport

- 4.29 The availability of public transport as the most sustainable form of travel is limited in a rural village, such as Bletsoe, and therefore it is important to make provision for private cars. Bletsoe is an attractive and historic settlement. Roadside car parking can be harmful to the character and identity of the village and, therefore, the provision of off-road parking can make a positive contribution to the appearance of the village. To respond to the particular circumstances within Bletsoe, the second objective of the BNP seeks to manage traffic and transport provision and to encourage safe and sustainable movement.

4.30 To meet the objective, BNP Policies 5 and 6 seek to ensure that appropriate provisions are made for the parking of vehicles and to encourage sustainable transportation methods wherever possible. I am satisfied that these policies will deliver the aims of national policy, they are in general conformity with the relevant strategic policies of the BBLP 2030 and the ADLP and meet the Basic Conditions.

Local Green Space

4.31 In the BBC ADLP, Policy AD 40 sets out criteria for the designation of open spaces as Village Open Spaces and Views. The Policy resists the development of land which is so designated on the ADLP Policies Map *“unless it can be demonstrated that the reasons for designation are not compromised or that other material considerations outweigh the need to retain the Village Open Space or View undeveloped”*.

4.32 Sites are shown on the BNP Policies Map for Village Open Space and these correspond to those identified in the ADLP. No additional sites are put forward. The sites in the BNP are then subject to BNP Policy 7, which seeks to protect Village Open Spaces and carries forward the provisions of Policy AD 40.

4.33 Since the ADLP was adopted, the NPPF has introduced a new higher tier of protection for open spaces called Local Green Space (LGS). This provides for the protection of green space which is of particular importance to communities through the designation of such sites in local and neighbourhood plans. BPC has not sought to test the green spaces in Bletsoe against the criteria for LGS in the NPPF as part of the work on the BNP.⁷ However, the policies of the ADLP form part of the statutory development plan. BNP Policy 7 aligns with Policy AD40 and the newly adopted Policy 35S in the BBLP 2030, which protects existing green infrastructure in the Borough. BNP Policy 7 therefore meets the basic conditions.

4.34 However, the BBLP 2030 includes Policy 45 “Local Green Space” which seeks to designate areas which are demonstrably special to local communities as LGS. In the review of the BNP it would be appropriate to consider whether any of the areas currently designated as Village Open Spaces would meet the criteria of the NPPF for LGS.

Facilities and Services

4.35 The fourth objective of the BNP is to ensure that the village benefits from sufficient facilities and services. In the BBLP 2030, Policy 94 seeks to secure the installation of telecommunications infrastructure in new developments. BNP Policy 8 carries through the provisions of this policy to the BNP and meets the Basic Conditions.

⁷ NPPF paragraph 100.

Non Policy Actions

4.36 In addition to the BNP Policies which I am required to consider against the statutory tests, each of the policy areas and objectives of the BNP are also supported by “Non Policy Actions”. These generally represent the intentions of the community for actions to be taken to achieve their wider aspirations. Though I have taken note of these Non Policy Actions, they will not form part of the statutory development plan and are not therefore considered against the Basic Conditions.⁸

Factual and Minor Updates

4.37 There are a number of factual updates that are required to the Plan as a consequence of the adoption of the BBLP in January 2020, including revisions to paragraphs 1.4-1.5, 2.6-2.13 and 7.3-7.4. These do not affect the Basic Conditions and can be made, alongside any other minor updates, in agreement between BPC and BBC.

5. Conclusions

Summary

- 5.1 The Bletsoe Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard to all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify some of the policies to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates.
- 5.4 The Bletsoe Neighbourhood Plan, as modified, has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

⁸ PPG Reference ID: 41-004-20190509.

Overview

- 5.5 The production of the BNP has undoubtedly required a high level of commitment and hard work by a group of volunteers from the local community. I commend the Parish Council and the BNPSG for producing a well written and effective Neighbourhood Plan. The Plan seeks to fulfil the wishes and aspirations of the local community whilst recognising the requirements of national and local plan policy. With the modifications appended to my report, the BNP should provide an effective Plan for the management of the future planning of Bletsoe.

Wendy J Burden

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Front cover	Insert prominently the Plan period "2017 – 2035" above "Our Parish – Our Plan – Our Future".
PM2	Appendix C	<p>Replace Appendix C of the submitted BNP with the version updated in February 2020.</p> <p>Update and replace the small text under each policy box in so far as it relates to the newly adopted Development Plan policies.</p>
PM3	Page 22 BNP Policy 1	<p>Amend the second paragraph as follows:</p> <p>"In order to maintain the intrinsic value of the countryside development proposals located outside of the defined SPA will be permitted if it is appropriate having regard to the policies of the adopted development plan, or where it can be clearly demonstrated that the proposal is sustainable development which seeks to enhance the vitality of the village, the historic environment and rural economy."</p> <p>Insert footnote after "development plan" as follows:</p> <p>"In particular Bedford Borough Local Plan 2030 Policy 7S."</p>
PM4	Page 24 BNP Policy 2	<p>Add to the list of criteria:</p> <p>"</p> <ul style="list-style-type: none"> • Proposals for the development of the site will include a scheme for surface water drainage using sustainable drainage systems which will achieve development run off rates at greenfield equivalents. • It can be demonstrated that opportunities to improve water

		quality, amenity and biodiversity benefits would be realised.”
PM5	Page 25 BNP Policy 3	Add to the list of criteria: ” <ul style="list-style-type: none"> Proposals for the development of the site will include a scheme for surface water drainage using sustainable drainage systems which will achieve development run off rates at greenfield equivalents. It can be demonstrated that opportunities to improve water quality, amenity and biodiversity benefits would be realised.”
PM6	Page 27 BNP Policy 4	Add to the list of criteria: ” <ul style="list-style-type: none"> Proposals for development which would materially increase surface water run off should include a scheme for surface water drainage using sustainable drainage systems which will achieve development run off rates at greenfield equivalents. It can be demonstrated that any opportunities to improve water quality, amenity and biodiversity benefits would be realised.”