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Report on Stevington Neighbourhood Plan 2020-2035

An Examination undertaken for Bedford Borough Council with the support of Stevington Parish Council on the June 2020 submission version of the Plan.

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Main Findings - Executive Summary

From my examination of the Stevington Neighbourhood Plan (the Plan/SNP) 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) – the Stevington Parish Council;
- The Plan has been prepared for an area properly designated – the Parish of Stevington as shown on page 10 of the Neighbourhood Plan;
- The Plan specifies the period to which it is to take effect: to 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

Stevington Neighbourhood Plan 2020-2035

- 1.1 The Neighbourhood Plan Area comprises the Parish of Stevington, which covers an area of some 678 hectares (1676 acres) about 6 miles north-west of Bedford, within Bedford Borough Council (BBC). The Parish contains several small settlements with a combined population of some 580 people. The main settlement of Stevington is a historic rural village with some 285 dwellings first mentioned in the Domesday Book of 1086. It is set within the limestone landscape of the River Great Ouse valley comprising mainly working arable farms with an extensive network of footpaths and bridleways.
- 1.2 Stevington has an older age profile than Bedford Borough as a whole with 56% of residents aged over 50 in 2011 (Borough 33.9%); 27% of residents aged over 65 (Borough 15.8%); and only 13% aged 0-15 (Borough 20.1%). By 2021, the population who are 75 or over in Stevington are projected to form 21% of the village population.
- 1.3 Self employment and working from home are relatively high within Stevington, with a number of small businesses and a range of professional services located within the village. Bedford, Milton Keynes and

Northampton are key work destinations and a higher than average number of residents commute daily to London.

- 1.4 The village benefits from a Community Shop run by volunteers and two public houses, otherwise there are no schools, GP surgeries or clinics, Post Office or banking facilities. Residents are dependent on nearby larger towns or villages and, in particular, Bedford for shopping and other services. With limited public transport, residents are largely reliant on the use of the car to access these.
- 1.5 There is an active community life, with a well-used Village Hall with adjacent sports field and children's play area, a number of clubs and societies, two churches with halls, the two public houses (the Royal George and The Red Lion) and a popular Cinema Club.
- 1.6 Stevington is served by narrow, rural roads from the north west, south west and south east, which converge on the 13th Century Stevington Cross in the centre of the village. These roads provide access to local highways, primary routes and rail travel. The A422 connects Bedford and Milton Keynes; the A6 which runs north to south links Bedford to Rushden and Luton; the A428 leads to Northampton and Olney; and the A421, a "strategic route" from west to east (which links the M1 via the south of Bedford to the A1) provides access to south Milton Keynes.
- 1.7 There are some 62 listed buildings of which 49 are individual dwellings. The village has the cruciform layout typical of an Anglo-Saxon village and many of the listed buildings lie within the Conservation Area designated in 1970. To the south east of the village is located the Stevington Windmill, listed as Grade II*, which was built in 1770 and is the only complete windmill left in the county.
- 1.8 The preparation of the SNP coincided with the emergence of the Bedford Borough Local Plan (BBLP). The BBLP 2030 was adopted by BBC in January 2020. The draft SNP was prepared generally in accordance with the several different BBC development plan documents which had effect in 2019. Nevertheless, in accordance with Government policy guidance, the SNP has been reviewed and updated to conform with the now adopted BBLP 2030.¹
- 1.9 The SNP is required to be in general conformity with the strategic policies of the statutory development plan, which is now the BBLP 2030 and the Bedford Borough Allocations and Designations Local Plan 2013 (BBADLP). I address the matter of general conformity of the SNP with the strategic policies of the Development Plan throughout my report.

¹ PPG Reference ID: 41-009-20190509.

The Independent Examiner

- 1.10 As the Plan has now reached the examination stage, I have been appointed as the examiner of the SNP by BBC, with the agreement of Stevington Parish Council (SPC).
- 1.11 I am a chartered town planner and retired government Planning Inspector, with more than 45 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

- 1.12 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.
- 1.13 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').

1.14 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

1.15 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.

1.16 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 During the early preparation of the draft SNP, 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;

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.

- The Core Strategy and Rural Issues Plan (CSRI) 2008 (to 2021); and
 - The Allocations and Designations Local Plan (ADLP) 2013.
- 2.2 In its initial drafting, the SNP was prepared to be in general conformity with the strategic policies in these BBC Development Plan Documents (DPDs), which had effect in 2019. Nevertheless, as the emerging BBLP was being drafted, the SPC sought to ensure that the SNP reflected the reasoning and evidence informing the local plan process. The SPC recognised the importance of minimising any conflicts between those policies in the Neighbourhood Plan and those in the emerging Local Plan during its preparation.
- 2.3 The BBLP 2030 was adopted by BBC in 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
- 2.4 In view of the close attention paid to the BBLP emerging policies during the preparation of the SNP, and the opportunity for review and updating of the SNP prior to its submission towards the end of May 2020, the submitted SNP has been prepared to be generally in conformity with the most up to date Development Plan policies.
- 2.5 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

Submitted Documents

- 2.6 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted in May 2020. These comprise:
- Stevington Neighbourhood Plan, June 2020;
 - Stevington Parish Map;
 - Basic Conditions Statement, April 2020;
 - Consultation Statement, February 2020;
 - Strategic Environmental Assessment screening report, October 2018;
 - Habitat Regulations Assessment for the SNP, January 2019;
 - Regulation 16 consultation responses;
 - Stevington Parish Council Local Green Space Submission 2016;
 - Housing Capacity Study: Urban Vision July 2018; and

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.

- Responses from SPC dated 7 September 2020 to my questions of 28 August 2020.

All the above documents are available on either the Borough Council or Parish Council websites.⁵

Site Visit

- 2.7 I visited the Neighbourhood Plan Area unaccompanied by any interested party on the 7 September 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

- 2.8 This examination has been carried out on the basis of the written submissions (written representations). 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. As noted, I have received further clarification from the QB in response to my letter of 28 August 2020.⁶ As a result, in terms of the appropriate level of scrutiny for the SNP, I consider that hearing sessions are not necessary.

Modifications

- 2.9 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 Stevington Neighbourhood Plan has been prepared and submitted for examination by SPC, which is the qualifying body for an area that was designated by BBC on 1 October 2013.
- 3.2 It is the only Neighbourhood Plan for Stevington Parish and does not relate to any land outside the designated Neighbourhood Plan Area.

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

⁶ See footnote 5.

Plan Period

- 3.3 The Plan specifies the period to which it is to take effect in section 1.1, which is to the year 2035. Although the SNP covers a period beyond the term of the BBLP, this does not in my assessment raise any issues of compliance. It may however be necessary to review the SNP when the BBLP is carried forward beyond 2030. In the interests of clarity, it would be helpful for the Plan to state the date prominently on the front cover [PM1].

Neighbourhood Plan Preparation and Consultation

- 3.4 A resolution to create a neighbourhood plan was passed on 17 September 2013. SPC was assisted by the Neighbourhood Plan Working Group (SNPWG), which carried out extensive consultation with the people of Stevington, landowners and others with an interest in the Parish and has taken their views into account in the preparation of the SNP.
- 3.5 A launch event for the preparation of the SNP was held in May 2015. The Consultation Statement sets out a summary of the consultation exercises which were then undertaken in the preparation of the SNP. The programme of consultation included updates in the quarterly Stevington Magazine, the creation of a dedicated website with regular updates throughout the Plan preparation process, the distribution of information leaflets and of questionnaires, and a community engagement exercise to consider the draft policies in November 2015. There was a “soft launch” consultation exercise which was completed in October 2018, with a “full document” consultation exercise from April to July 2019 before the Regulation 14 6-week consultation from 9 December 2019 to 27 January 2020.
- 3.6 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 10 July 2020 and closed on 24 August 2020. I have considered the representations that were made at the Regulation 16 stage in preparing this report. I am satisfied that a transparent, fair and inclusive consultation process has been followed for the SNP. Due regard has been had to the advice in the PPG on plan preparation and the SNP is procedurally compliant in accordance with the legal requirements.

Development and Use of Land

- 3.7 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

- 3.8 The Plan does not include provisions and policies for ‘excluded development’.

Human Rights

- 3.9 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 SNP has been screened for Strategic Environmental Assessment (SEA). The conclusion was that it is unlikely that there will be any significant environmental effects arising from the SNP and that SEA is not required. The screening report was sent to the Environment Agency, Historic England and Natural England for comment. All three Agencies responded to confirm that SEA was not required. I have read the SEA screening report and have no reason to disagree with its conclusion.
- 4.2 The recently adopted BBLP does not allocate any growth in housing numbers for Stevington. To meet local need, the SNP aims to deliver between 11-15 new dwellings during the Plan period. The Housing Capacity Study (July 2018) considered five alternative options for meeting this need. It also identified sufficient capacity for that level of new housing to be delivered through infill and redevelopment within the Settlement Policy Area (SPA) as defined in the BBLP. I am satisfied that the SPC has taken an appropriate and thorough approach to the consideration of reasonable alternatives in accordance with the requirements of SEA in the assessment of housing sites in the preparation of the SNP.
- 4.3 A Habitats Regulations Assessment (HRA) was carried out for the BBLP 2030 which identified the potential for likely significant effects on two European sites, The Ouse Washes and Portholme, downstream of Bedford. Although the policies within the Local Plan should protect the European sites if followed, detail was not available from the other emerging neighbourhood plans in the authority area to confirm this for all developments. Further screening of the Stevington Neighbourhood Plan has been carried out to ensure that there were no unforeseen likely significant effects.
- 4.4 This screening of the SNP identified the same likely significant effects on the two European sites as the Bedford Borough Local Plan to 2030 but at a reduced scale. Following Appropriate Assessment of the SNP (AA Stage 2) some rewording of the policies of the SNP has been undertaken to provide protection to the European sites. The policies provide the framework to avoid or mitigate against any likely significant effects, with the exception of the threat from non-native invasive plants, which by its nature cannot be eliminated entirely.

- 4.5 The HRA concludes that the Stevington Neighbourhood Development Plan can proceed as it will not have significant effects on any European sites itself or in combination with other plans, on the assumption that other plans avoid or have mitigated against the likely significant effects. Based on my own independent assessment, I agree with this conclusion.

Main Issues

- 4.6 I have approached the assessment of compliance of the SNP 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

Regard to National Policy and Advice

- 4.7 The SNP 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 historic village and attractive rural setting. A vision statement to reflect the development aims for Stevington is identified in Chapter 2. Below this are listed 7 development aims for the area, which are based upon the feedback and support received from local people. The objectives include the protection of its special characteristics such as the green open spaces, its distinctive landscape setting and the historic assets within the Parish; whilst seeking to allow for some new housing of appropriate design and scale to meet the needs of residents of the Parish.
- 4.8 These objectives have regard to the advice in NPPF paragraph 28, which identifies matters to be delivered through non-strategic policies in neighbourhood plans. The SNP is positively prepared, with an aspirational but deliverable approach to the development of the Parish, and it has been shaped through early, proportionate and effective engagement within the local community.
- 4.9 In general, the policies of the SNP are clearly written and unambiguous⁷ and I recommend modification where necessary to achieve this requirement. Where there is some duplication of the policy set out in the BBLP 2030⁸, I recommend deletion where appropriate.
- 4.10 An assessment has been carried out to indicate that there is capacity within the SPA to meet local needs for housing without the allocation of new housing sites. With the range of policies formulated to meet its development aims, the SNP demonstrates a positive approach to an appropriate level of growth within the Parish. Subject to the modifications which I recommend, the SNP has had regard to national policy and advice.

⁷ See PPG Reference ID: 41-041-20140306.

⁸ See NPPF paragraph 16 f).

Contributes to the Achievement of Sustainable Development

- 4.11 By taking a positive approach to the delivery of residential development to meet local needs, the SNP provides for sustainable development through its housing and other development policies. Whilst the Plan provides for new housing in the village, in doing so it has regard to the economic, social and environmental needs of the local community. The SNP accords with paragraph 29 of the NPPF since it complements the strategic policies for the area.
- 4.12 The three overarching objectives of sustainable development are integral to the core objectives of the SNP. Together with the policies of the BBLP 2030, the policies and proposals of the SNP contribute to the achievement of sustainable development in accordance with national policies and advice.
- 4.13 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

- 4.14 I set out the planning policy context for the SNP in section 2 above. The SNP was prepared alongside the emerging BBLP 2030 and the policies, as submitted in the SNP June 2020, seek to be in general conformity with those in the BBLP 2030 as adopted in January 2020.
- 4.15 The village of Stevington is identified in the BBLP 2030 as being within the rural areas of the Borough. In considering the location of development in rural areas in the BBLP, the distinction between settlements and areas of countryside is established by defining SPAs. The aim of the Local Plan for the rural areas is to direct development to within the defined SPA boundaries in accordance with Policy 5S.
- 4.16 Stevington is listed in the BBLP as a settlement with a SPA. There is no requirement in the BBLP 2030 for the SNP to allocate land for housing in order to meet Borough wide needs, but the provision of new housing may be brought forward through the neighbourhood planning process. Policy 5S of the BBLP 2030 allows for development in villages with a SPA, provided that it is consistent with the other policies of the Development Plan. The SNP makes no proposals to alter the SPA as defined in the BBLP Policies Map Inset 32. This map is reproduced at page 9 of the SNP.
- 4.17 Within the village there are sites which were designated as Village Open Space in the BBADLP (Policy AD40). The BBLP designates areas for Local Green Space (LGS) in accordance with national policy but does not designate any LGS in Stevington. SPC has carried out its own assessment of proposals for LGS designation as part of the preparation of the SNP.

This approach is appropriate since LGS can only be identified in Local or Neighbourhood Plans.⁹

- 4.18 The SNP has been developed with proper regard to the strategic direction and policies of the BBC DPDs, which I identify in Section 2 above. In addition, with some modifications which I recommend below, the SNP demonstrates general conformity with the recently adopted strategic policies of the BBLP 2030. BBC has been involved throughout the preparation of the SNP 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 SNP is in general conformity with the strategic policies of the Development Plan.

Specific Issues of Compliance of the Plan Policies

Housing Policies

- 4.19 To reflect the need identified by the SPC and the views expressed by the local community during the consultation process, Policy HO1 gives positive support for proposals for new housing within the SPA subject to certain criteria. These criteria identify the detailed matters to be addressed in any planning application. They reflect local concerns and the specific issues which require addressing within Stevington, and as such comply with national policy relating to the content of non-strategic policies appropriate in neighbourhood plans.
- 4.20 Policy HO2 seeks to ensure that new housing will meet the particular needs identified for Stevington as a result of its population profile and in response to the views of the local community. Having regard to the rural character of Stevington, and the limited opportunity for new housing to be provided, I consider this policy to be justified.
- 4.21 To enable the change of use of existing buildings to dwellings outside the SPA, Policy HO3 sets out the criteria to be applied in the consideration of such proposals. The criteria address issues relevant to the locality. They are clearly set out in the Policy and justified in the explanatory text.
- 4.22 Policy HO4 supports the subdivision or demolition of existing dwellings within the SPA but generally outside the Conservation Area. It lists the detailed criteria against which any proposal would be considered. The Policy is clearly set out and fully justified in the particular circumstances of Stevington.
- 4.23 I am satisfied that the Housing Policies of the SNP meet the Basic Conditions.

⁹ See NPPF paragraph 99.

Design and Heritage Policies

- 4.24 The text and policies in this section reflect the importance of the character and appearance of the village and its surrounding landscape to the community of Stevington. There are no issues of compliance raised by Policies DH1 and DH3.
- 4.25 Policy DH2 deals with non-designated heritage assets. In the NPPF paragraph 197 sets out the approach which should be taken when considering such proposals. Policy DH2 requires that new development does not cause harm to the significance of the asset, that it preserves its historical and architectural interest and that extensions do not dominate the original building. As a result, the policy imposes a more onerous requirement in the assessment of development that affects a non-designated heritage asset than that set out in national policy. There is no clear justification set out to justify this more onerous approach.
- 4.26 National policy¹⁰ sets out the criteria through which any proposals for the development of non-designated heritage assets should be assessed. In the absence of any clear evidence to justify a more restrictive set of criteria in the SNP, I recommend Policy DH2 should be deleted in order for the SNP to have the necessary regard to national policy. I also recommend changes to the explanatory text to the policy to reflect the deletion of Policy DH2 [**PM2**].
- 4.27 Subject to the modifications which I recommend in the Appendix, the Design and Heritage Policies meet the Basic Conditions.

Environment Policies

- 4.28 Policy EN1 sets out criteria which aims to protect the particular qualities of the environment of Stevington. The Policy raises no issues of compliance.
- 4.29 Stevington has a number of Village Open Spaces (VOS) which were designated in the BBADLP 2013. In the preparation of the BBLP consideration was given by BBC to changing the designation of VOS to Local Green Space (LGS) in accordance with the criteria set out in national policy and advice. Because Stevington was preparing a neighbourhood plan, the SPC took on the task of reviewing green spaces within the Parish to identify potential LGS designations.
- 4.30 Policy EN2 identifies two former VOS (LGS1 and LGS3) to be designated as LGS, and two additional sites which had not previously been identified. Having regard to the importance to the community of the Village Playing Field (LGS1) and the Meadow opposite to Manor Farmhouse (LGS3) I consider the designation of these sites as LGS to be fully justified.

¹⁰ NPPF paragraph 197.

- 4.31 LGS2 is the site of the Stevington Windmill together with the strip of land which provides access to the site. The Windmill is an important local feature and the approach is clearly well used and maintained. It does not enjoy any protection as a public right of way. Having regard to the historic, amenity and wildlife importance of the site I consider that the designation as LGS is justified.
- 4.32 With regard to LGS4, this is formed by a strip of woodland which runs from Park Road and widens out into a small spinney adjacent to the bank of the River Great Ouse. There are paths through the woodland and along the river bank which appear well used by walkers. A Public Footpath (19) runs along the south east of the woodland. The wooded strip provides a visual screen between Oakley and Stevington, it is used for informal recreation with access to the riverbank and is a valuable wildlife habitat. Although the woodland is protected by a Tree Preservation Order (TPO), I consider that the designation as LGS is justified.
- 4.33 The four sites designated in Policy EN2 as LGS meet the criteria in national policy and advice, and the Policy raises no issues of compliance. However, clause 2 of Policy EN2 provides that "*Designated Local Green Space must remain as open green spaces*". This ignores the exceptional circumstances test in NPPF paragraph 136, as policies for managing development within a LGS should be consistent with those for Green Belts.¹¹ Therefore, in order to have regard to national policy, I propose a modification to clause 2 of Policy EN2 to clarify that LGSs should be managed in a manner compatible with their designation. [PM3]
- 4.34 Subject to the modification which I recommend in the Appendix, the Environment Policies meet the Basic Conditions.

Community Facilities

- 4.35 Stevington has experienced the loss of community facilities as a result of lack of viability and cost saving. The community understandably seeks to retain those community assets which remain. This approach complies with NPPF paragraph 92c) which states that planning policies should guard against the unnecessary loss of valued facilities and services. In the BBLP, Policy 99 addresses the loss of existing sports and community facilities and sets out the circumstances in which their loss or replacement will be permitted.
- 4.36 The criteria in Policy CF1 (1–4) generally accord with national and local plan policy. In the "List of Community Facilities", all the buildings have public access and are used for community meetings, clubs or events apart from the Almshouses in Park Road. These are the responsibility of a charity which provides low cost accommodation for up to 5 beneficiaries at a time and are effectively in use as private residences. As private residences, I consider it is inappropriate for the Almshouses to be included

¹¹ NPPF paragraph 101.

in the list of community facilities and recommend that it should be deleted from the list. [PM4]

- 4.37 Subject to the modification which I recommend in the Appendix, the Community Facilities Policy meets the Basic Conditions.

Transport and Infrastructure Policies

- 4.38 Policies T11 deals with traffic impact from new developments. As currently drafted the policy identifies matters of concern to the local community which is appropriate for a neighbourhood plan. However, I recommend some modifications to ensure that the criteria will endure over time, are clearly drafted and will provide the opportunity for the objective assessment of proposals having regard to issues of local concern. [PM5]
- 4.39 T12 raises no issues of compliance.
- 4.40 In the interests of clarity and to meet the requirements of the local water authority, I recommend a modification to Policy T13 to refer to the use of Sustainable Drainage Systems (SuDS). The use of SuDS would help to reduce the risk of surface water and sewer flooding and have wider benefit in terms of water quality enhancement. [PM6]
- 4.41 Subject to the modifications which I recommend in the Appendix, the Transport and Infrastructure Policies meet the Basic Conditions

Business and Employment

- 4.42 The SNP seeks to provide an attractive environment for businesses and services to locate and flourish. Policy BE1 sets out the criteria against which new business, employment and tourism related development will be considered. The Policy raises no issues of compliance.
- 4.43 Policy BE2 seeks to ensure that new development incorporates provision for high speed internet connectivity. However, BBLP Policy 94 sets out the requirement for the installation of infrastructure to support fibre optic broadband technology in both residential and non-residential development. In order to avoid the repetition of policy, I recommend that Policy BE2 and the subsequent text be deleted. [PM7]
- 4.44 Subject to the modification which I recommend in the Appendix, the Business and Employment Policies meet the Basic Conditions.

Factual and Minor Amendments and Updates

- 4.45 There are some typographical errors in the text of the SNP. I have not identified them unless they would affect the Basic Conditions. Minor amendments can be made consequential to the recommended

modifications, alongside any other minor changes or updates, in agreement between SPC and BBC.¹²

5. Conclusions

Summary

- 5.1 The Stevington 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 Stevington Neighbourhood Plan, as modified, has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary and which would require the referendum to extend to areas beyond the Plan boundary. I therefore recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Overview

- 5.5 The production of the SNP 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 Neighbourhood Plan Working Group for producing a well written and effective Neighbourhood Plan.
- 5.6 The Plan has achieved the difficult task of setting out positive proposals to enable Stevington to accommodate new housing. The SPC has consulted with and taken into account the views of the local community, whilst seeking to allow for a level of new homes which will benefit the community and protect the character and setting of Stevington as an attractive and historic village within the countryside. As a result, the SNP meets the Basic Conditions. With the recommended modifications

¹² PPG Reference ID: 41-106-20190509.

appended to my report, the SNP should provide an effective Plan for the management of the future planning of Stevington.

Wendy J Burden

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Front cover	Insert under Heading "2020-2035".
PM2	Page 39	<p>Delete Policy DH2.</p> <p>Delete heading "DH2 Interpretation" and insert new heading "Non-designated heritage assets".</p> <p>In the second sentence of the first paragraph under the new heading:</p> <ul style="list-style-type: none"> • Change "the policy" to "national policy as set out in NPPF paragraph 197". • Delete "a significant factor" and insert "taken into account".
PM3	Page 50 Policy EN2	In 2.: delete "remain as open green spaces" and insert "be managed in a manner compatible with their designation".
PM4	Page 53 Policy CF1	Delete "a. Almshouses, Park Road".
PM5	Page 57 Policy T11	<p>In 1.: delete "made to ensuring" and insert "paid to".</p> <p>In a.: delete "existing problems of traffic capacity are not exacerbated, especially on existing pressure points" and insert "whether there is adequate highway capacity to support the proposal, in particular".</p> <p>In b.: delete "there is no adverse" and insert "the".</p> <p>In c.: delete "there is no significant adverse" and insert "the".</p>
PM6	Page 58 Policy T13	<p>Rename: "Sustainable Drainage Systems".</p> <p>In 1. Delete "sustainable urban drainage" and insert "Sustainable Drainage Systems (SuDS)".</p>

PM7	Page 61 Policy BE2	Delete Policy BE2 and the subsequent text.
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