



Basic Conditions Statement

Great Denham Neighbourhood
Development Plan

December 2022



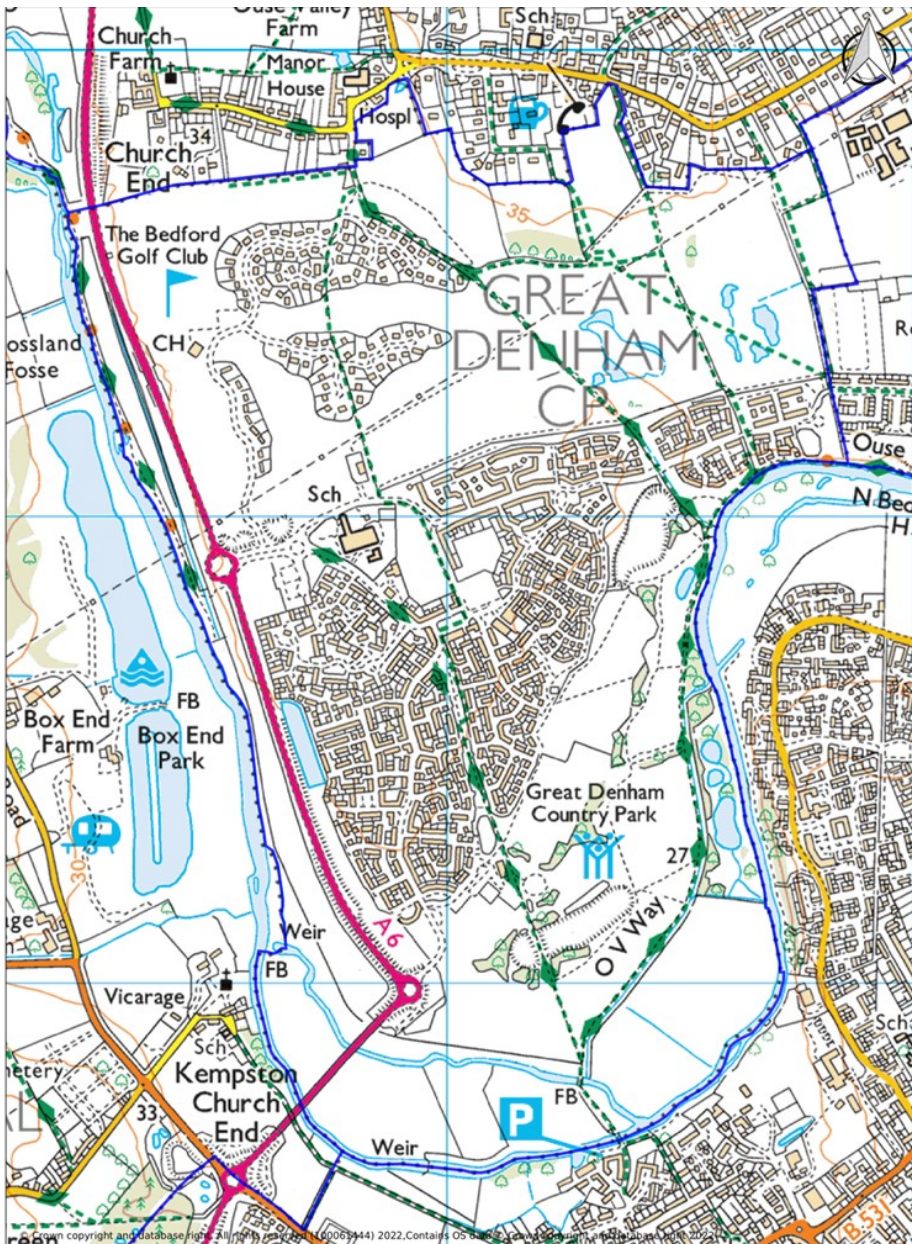
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1. Introduction

- 1.1. This Statement has been prepared by Great Denham Parish Council (GDPC) to accompany the Great Denham Neighbourhood Plan 2020-2030 (Submission Version December 2022) on submission to Bedford Borough Council (BBC) under regulation 15 of the Neighbourhood Planning (General) Regulations 2012 as amended (“the Regulations”).
- 1.2. The Neighbourhood Plan has been prepared for the Neighbourhood Area covering the whole of the Parish, as designated by Bedford Borough) in January 2014. (see Figure 1 below).
- 1.3. The policies described in the Neighbourhood Plan relate to the development and use of land in the designated Neighbourhood Area and do not relate to any other designated Neighbourhood Area. The plan period is from 1st April 2022 to 31st March 2030.
- 1.4. The Neighbourhood Plan does not contain policies relating to excluded development in accordance with the Regulations. The document also contains a number of non-statutory proposals that relate to Aspirations which do not form part of the examined ‘neighbourhood development plan’ but provides a ‘wish list’ that has emerged during consultation that the Parish Council has considered during the preparation of the document.
- 1.5. The Statement addresses each of the four ‘basic conditions’ required of the Regulations and explains how the submitted Neighbourhood Plan meets the requirements of paragraph 8 of schedule 4B to the Town and Country Planning Act 1990.
- 1.6. The Regulations state that a Neighbourhood Plan will be considered to have met the basic conditions if:
 - Having regard to National Policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan
 - The making of the neighbourhood development plan contributes to the achievement of sustainable development
 - The making of the neighbourhood development 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)
 - The making of the neighbourhood development plan does not breach, and is otherwise compatible with EU obligations

Figure 1: Map showing extent of Neighbourhood Planning Area (blue line)



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2. Background

2.1. The plan preparation has been led by GDPC, through the Neighbourhood Plan Steering Group. It has comprised three main stages:

- Evidence gathering and community engagement which has been incorporated into the Neighbourhood Plan

- Pre-Submission Neighbourhood Plan August 2022 (Draft version); the draft plan and accompanying background documents were published for more than 6 weeks in accordance with regulation 14 of the Regulations.
 - Submission Neighbourhood Plan (December 2022) which takes into account representations received on the earlier version and has been modified for submission to BBC; it is accompanied by the Basic Conditions Statement, the Consultation Report, the Green Infrastructure Plan, Great Denham Design Code.
- 2.2. GDPC has consulted the local community extensively throughout the process.
 - 2.3. The Parish Council website <https://greatdenhamparishcouncil.gov.uk/great-denham-neighbourhood-plan/> has been used throughout the process to disseminate information and publicise consultations. A number of methods to raise awareness have been used, including banners, flyers and notices on the Parish Council noticeboards.
 - 2.4. The Draft Neighbourhood Plan was formally consulted upon from 15th August 2022 to 14th October 2022. Full details are set out in the separate Consultation Report.
 - 2.5. It has also worked closely with officers of BBC since the start of the project to collate and examine the evidence base, to design and iterate policy proposals and to define the proper relationship between the NP and the Local Plan.
 - 2.6. The Plan has not duplicated Local Plan policies which will be used in determining planning applications. This has allowed the Neighbourhood Plan to focus on a smaller number of locally relevant and important policies.

3. Conformity with National Planning Policy

- 3.1. The Neighbourhood Plan has been prepared with regard to national policies as set out in the National Planning Policy Framework 2012 (NPPF) and the revised Framework of July 2021 and is mindful of the National Planning Practice Guidance (NPPG) in respect of formulating neighbourhood plans.
- 3.2. There are several NPPF paragraphs that provide general guidance on neighbourhood planning, to which the Neighbourhood Plan has directly responded:
- 3.3. In relation to the presumption in favour of sustainable development:
 - Paragraph 12: the development plan is the starting point for decision making and this includes any neighbourhood plan.
 - Paragraph 13: neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies and should shape and direct development that is outside of these strategic policies.
 - Paragraph 14: reminds us of the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to be significantly and demonstrably outweigh the benefits provided, four criteria apply.
- 3.4. The Parish Council believes that the Neighbourhood Plan is planning positively for future development in the parish and supports the delivery of the strategic policies of the adopted Development Plan as advised in the above paragraphs of the NPPF.
- 3.5. Paragraphs 18 and 21 advise that policies to address non-strategic matters and detailed matters should be included within neighbourhood plans, and the Neighbourhood Plan contains such policies.
- 3.6. Advice on non-strategic policies and the role of neighbourhood plans is identified in paragraphs 29 and 30. The Neighbourhood Plan establishes a shared vision for the area and its policies shape, direct and help deliver sustainable development. It has sought to translate objectives into a number

of meaningful planning policies to complement other development plan policies for managing development.

- 3.7. The Neighbourhood Plan strikes a positive balance between the policy constraints of the Parish and the need to support the general requirements of the development plan as set out in section 5 below.
- 3.8. The Neighbourhood Plan avoids duplicating development plan policies by focusing on policies that translate the general requirements of the development plan into a local context. Once made, the Neighbourhood Plan should be easily considered alongside the development plan and any other material considerations in determining planning applications.
- 3.9. Set out below is a brief summary of how each policy conforms to the NPPF. The particular paragraphs referred to in the table are those considered the most relevant to each policy but are not intended to be an exhaustive list of all possible relevant paragraphs.

Table 1: NPPF Conformity

Policy	Policy Title	NPPF Para no.	Commentary
D1	The Design of New Development	92, 126, 127, 130	This policy seeks high quality sustainable design for new development which respects the character of the parish.
D2	Maintaining Separation	126, 127, 130	Ensures the identity of Great Denham and Biddenham remain separate.
D3	Archaeology	130, 189, 195, 199, 201, 203	Seeks to conserve archaeological remains.
D4	Provision of Sustainable Buildings	8c, 152, 154, 157	Ensuring that new development is built sustainably and is energy and water efficient.
D5	New Housing	85, 130	Provision of affordable housing and a housing mix and embracing principles of Building for a Healthy Life.
F1	Community facilities	92,93,	Promotes protection of existing community facilities which are locally valued and increase community cohesion.
F2	Supporting Local Businesses	84, 85, 114	Appropriate business uses will be supported and retained, including Class E premises and home working.
G1	Open Space provision as part of new development	98	Open space to be provided in new developments linking to green spaces and maintained.
G2	Local Green Spaces	101, 102, 103	Designates Local Green Spaces in line with the criteria set out in the NPPF.
G3	Great Denham Country Park		New development will be required to ensure that the quality and functions of the Park are preserved and enhanced.
G4	Nature Conservation	174, 175, 179	New development is expected to retain natural features, and enhance them, provide a 10% net gain in biodiversity and plant new landscaping.
G5	Provision for pedestrians and cyclists	100, 104, 106	New development to provide pavements and improve pedestrian and cyclist safety.

Policy	Policy Title	NPPF Para no.	Commentary
T1	The traffic impact of new development	100, 104, 108, 112	Requires new development to manage traffic and ensure new traffic related infrastructure is provided.
T2	Car Parking	107, 108	Requires new parking for new development and retain existing off road parking spaces.

4. Contribution to Sustainable Development

- 4.1. Great Denham Parish Council has determined that a Strategic Environmental Assessment (SEA) and a Habitats Regulations Assessment (HRA) were not required for the Neighbourhood Plan as it considered the policies were unlikely to have a significant environmental effect, as defined by the Environmental Assessment of Plans and Programmes Regulations 2004. The SEA screening report is dated June 2022. The HRA Report is dated December 2022.
- 4.2. However, the basic condition of “contributing to the achievement of sustainable development” requires a broader scope of assessment to embrace social and economic as well as environmental objectives. For completeness therefore, Table 2 summarises the economic, social and environmental attributes of each policy.
- 4.3. The vision and objectives of the Neighbourhood Plan comprise a balance of social, economic and environmental goals. The social goals are to retain and encourage the local facilities and of meeting the need for appropriate new homes. Economic goals are relatively limited in scale in the Parish, but the provision of local business is recognised. Environmental goals include the protection and enhancement of the area’s natural and historic environment.
- 4.4. However, the objectives make clear that there are environmental parameters within which the social and economic goals must be kept by ensuring development is in scale with the rural character of the existing parish.
- 4.5. The chosen policies therefore translate the objectives of the Neighbourhood Plan into viable and effective development management policies which will deliver strong social, economic and environmental impacts.
- 4.6. The sustainability attributes of each policy are summarised in the table below.

Table 2: Sustainability Attributes

Key: *positive - neutral x negative

Policy	Policy Title	Soc	Econ	Env	Commentary
D1	The Design of new development	*	*	*	In economic terms, this policy is only slightly positive because well designed places and buildings can ensure value is retained/increased, but it is positive in environmental and social terms. It seeks to ensure that important design and biodiversity features are retained and enhanced.
D2	Maintaining Separation	*	-	*	The retention of a gap between settlements has positive social and environmental impacts ,by retaining the character of the settlement as a separate one and not developing existing open land.

Policy	Policy Title	Soc	Econ	Env	Commentary
					The land is not earmarked for development so there is a neutral economic impact.
D3	Archaeology	-	-	*	This policy will deliver a very positive impact on the historic environment.
D4	Provision of Sustainable Buildings	*	*	*	This policy has a positive impact on all three objectives, ensuring that new development is sustainable as possible in terms of construction, water and energy efficiency.
D5	Housing	*	*	x	This policy may have a negative impact on the environment, because it allows new housing. However, there are positive effects on social wellbeing by providing housing and also economic benefits by construction and by bringing in additional residents who can support local facilities. A housing mix which reflects the needs of the parish will bring positive social benefits.
F1	Community facilities	*	*	*	The retention and encouragement of community facilities will clearly be positive in terms of wellbeing and social aspects of parish life as well as retaining local businesses.
F2	Supporting Local Businesses	-	*	-	Supporting local business is very important and contributes to the economic aspect of sustainable development.
G1	Open Space as part of new development	*	-	*	This policy ensures new green spaces are provided and therefore has a positive social and environmental impact.
G2	Local Green Spaces	*	-	*	This policy protects green spaces from being developed and therefore has a positive social and environmental impact.
G3	Great Denham Country Park	*	-	*	The policy has social and environmental benefits by ensuring that the Country Park is enhanced and preserved for its various functions for leisure and biodiversity uses.
G4	Nature Conservation	*	-	*	Provides a positive impact for the natural environment and for the sense of place which can enhance the wellbeing of residents.
G5	Provision for pedestrians and cyclists	*	-	*	Ensuring the traffic environment is safe for pedestrians and does not lead to inappropriate levels of traffic is both positive for the environment and for social goals. The provision of footpath and cycleways improve the health of residents and also is a positive benefit for the environment, reducing pollution.
T1	The traffic impact of new development	*	x	*	New developments result in additional traffic. The policy seeks to reduce the impact through mitigation thereby having a positive impact on social and environmental factors.
T2	Car Parking	-	-	*	Encouraging parking could be seen as having a negative impact on the environment in terms of

Policy	Policy Title	Soc	Econ	Env	Commentary
					emissions etc, however in this location there is limited public transport opportunities.

5. General Conformity with Strategic Local Policy

- 5.1. Great Denham Parish lies within the local planning authority of the Bedford Borough Council. The Development Plan currently consists of the Allocations and Designations Local Plan 2013 and the Bedford Borough Local Plan 2030. This Local Plan includes new policies for development management as well as allocating sites for new housing and employment development. There is a requirement for neighbourhood plans to be in general conformity with the strategic policies of the Local Plan and the Neighbourhood Plan has been prepared with this in mind. The BBC documents define which policies they consider to be strategic by the suffix 'S'.
- 5.2. The following tables set out the comparison of Neighbourhood Plan policies with policies from both Local Plans.
- 5.3. Accordingly, the Neighbourhood Plan is in general conformity with the Local Plans and the policies have been designed to add local context to the development plan policies of the area.

Table 3: Conformity with BBC Allocations and Designations Local Plan 2013 and Bedford Borough Local Plan 2030

NP Policies	Policies (LP = Local Plan)	Assessment
Policy D1: The Design of New Development	LP 28S, 29 & 30, 35S, 38, 39, 40, 54	The policy seeks high quality design in many aspects, including retention of trees and hedgerows, sustainable building and construction.
Policy D2: Maintaining Separation	LP28S, 37, AD42	The policy seeks to retain the distinction between Biddenham and Great Denham, giving more detail on the Policies Map than the Local Plan and Allocations and Designations Plan.
Policy D3: Archaeology	LP 41S	Archaeology assets within the Parish are protected under this policy.
Policy D4: Provision of Sustainable Buildings	LP51S, 52, 54	The Local Plan promotes sustainable development and this policy gives requirements/guidelines specific to Great Denham.
Policy D5: New Housing	LP 58S, 59S	There is an emphasis on providing affordable homes in line with the Local Plan and any future Housing Needs Assessment.
Policy F1: Community Facilities	LP 83, 98, 99	This policy is in general conformity with Policy 99 which secures the protection of community facilities unless it is demonstrated that they are no longer viable.

Policy F2: Supporting Local Businesses	LP 81, 82, 84, 86S	This policy supports appropriate retention, provision and expansion of business enterprises .
Policy G1: Open Space Provision as part of new development	LP 35S, 97, 98	The policy seeks to ensure that new open spaces are provided in accordance with the Green Infrastructure Plan and linked to existing Green Infrastructure and wildlife corridors where possible in accordance with 35S.
Policy G2: Local Green Spaces	LP 45, 35S	The Local Green Spaces designated within this policy have been determined to be demonstrably special to the local community thereby meeting the requirements of NPPF. These spaces are protected to conserve their importance to the character of the Parish and are in general conformity with the strategic policies.
Policy G3: Great Denham Country Park	LP 28S, 35S, 44 91	All development would be expected to maintain and preserve the character and importance of the River Great Ouse and Country Park.
Policy G4: Nature Conservation	LP 35S, 42S, 43	The policy seeks to ensure that natural features and the biodiversity network is protected and enhanced, in particular biodiversity net gain expected through new development in accordance with policies 42S and 43.
Policy G5: Provision for pedestrians and cyclists	LP 31, 53, 91	All Rights of way including those throughout the parish are protected by this policy and improvements are encouraged in conformity with Policy 91.
Policy T1: the traffic impact of new development	LP 31, 32, 88	Policy 31 requires that development proposals should not have any adverse impact on access to the public highway.
Policy T2: Parking	LP 31	New development must be accompanied by appropriate parking and parish parking should be retained.

6. Compatibility with EU Legislation

- 6.1. **Strategic Environmental Assessment.** A formal screening opinion has been issued by the Parish Council, no SEA was required as set out in Section 7 of that report. The Council received a response from the Environment Agency, Historic England and Natural England, all noting that they agreed with the Council findings that the Great Denham NP does not require a full SEA to be undertaken. The Neighbourhood Plan has accordingly been prepared in accordance with EU Directive 2001/42 on strategic environmental assessment (SEA).
- 6.1. **Habitats Regulations.** The screening was carried out by Bedfordshire Rural Communities Charity for the Parish Council. Paragraph 1.9 of the report states that *“This HRA concludes that the Great Denham Neighbourhood Plan can proceed as there are no likely significant effects from the GDNP on any of the conservation objectives of any of the European sites investigated and therefore there will*

be no impact on site integrity in any of the European sites from the GDNP itself or in combination with other plans that have currently been adopted.”

- 6.2. **Human Rights.** The Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act. The overall purpose of the Neighbourhood Plan is to improve the quality of life for people living and working now and in the future in the parish from an environmental, social and economic point of view. The aims and policies in the Neighbourhood Plan have been formulated in response to local people’s views and in the light of evidence gathered for the parish, in order to meet the needs expressed and address the issues identified. In order to confirm that the NP does not have any unintended consequences for particular groups the strategic aims and the policies in the Plan have been systematically scrutinised to ensure that they do not disadvantage any potentially vulnerable groups. The Equality Act 2010 places a duty on all public authorities in the exercise of their functions to have regard to the need to eliminate discrimination, to advance equality of opportunity, and to foster good relations between persons who have a “protected characteristic” and those who do not. “Protected characteristics” are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 6.3. An assessment has been made on whether the policies in the Neighbourhood Plan have a positive, negative or neutral impact on each of the protected characteristics.
- 6.4. Certain protected characteristics are not affected by the Neighbourhood Plan, namely gender reassignment, race, religion, or sexual orientation. For persons with these characteristics, the Plan has a neutral effect. Where policies in the Plan would adversely affect persons with these protected characteristics, they would not be differently affected than persons without these characteristics. For example, if a person with these protected characteristics were disadvantaged by a policy, it would have the same consequence for a person without the protected characteristic who wished to do the same thing. Similarly, if a person with one of these protected characteristics were to benefit from a policy, it would have the same benefit for a person without the protected characteristic in the same way.

Table 4: Human Rights

Policy	Policy Title	Outcomes for persons with certain protected characteristics
D1	The Design of New Development	Broadly positive impact
D2	Maintaining Separation	Neutral impact
D3	Archaeology	Neutral impact
D4	Provision of Sustainable Buildings	Neutral impact
D5	New Housing	Broadly positive impact
F1	Community facilities	Broadly positive impact
F2	Supporting Local Businesses	Broadly positive impact
G1	Open Space provision as part of new development	Neutral impact
G2	Local Green Spaces	Neutral impact
G3	Great Denham Country Park	Neutral Impact
G4	Nature Conservation	Neutral Impact
G5	Provision for pedestrians and cyclists	Broadly positive impact
T1	The traffic impact of new development	Neutral Impact
T2	Car Parking	Neutral Impact

7. Conclusion

- 7.1. Great Denham Neighbourhood Plan has been carefully prepared in accordance with the requirements of the Regulations and satisfies the Basic Conditions as set out in Paragraph 1.6 thereby contributing to the achievement of sustainable development.