

RECORD OF EXECUTIVE DECISION TAKEN BY AN EXECUTIVE MEMBER

This form **MUST** be used to record any decision taken by the Elected Mayor or an individual Executive Member (Portfolio Holder).

The form must be completed and passed to the Chief Officer Legal and Democratic Services no later than NOON on the second working day after the day on which the decision is taken. No action may be taken to implement the decision(s) recorded on this form until 7 days have passed and the Chief Officer Legal and Democratic Services has confirmed the decision has not been called in.

1. Description of decision

To secure the necessary agreements so that the Bromham Neighbourhood Plan can progress to the referendum stage of the neighbourhood plan making process, it is agreed:

- To make modifications to the Bromham Neighbourhood Plan in line with the recommendations set out in the examiner's report (Appendix A) and that as modified (Appendix B), the Plan meets the basic conditions
- That the formal Decision Statement (Appendix C) be published by 10 July 2020 in order to comply with the statutory deadline, and to inform those interested about the Council's decision
- To make arrangements to progress the Plan to the referendum stage of plan preparation
- That the designated Bromham Neighbourhood Area represents the appropriate geographical area to be covered by the referendum

2. Date of decision

29TH June 2020

3. Reasons for decision

The purpose of this decision is to provide information about the examination of the Bromham neighbourhood plan; to explain the examiner's recommended modifications to the plan and to set out the Council's response to those modifications. The Council must decide whether to progress the plan to referendum and in doing so, decide the area over which the referendum should take place.

4. Alternatives considered and rejected

Consideration has been given to the need for modifications not proposed by the examiner. It has been determined that no such modifications are required in order for the Bromham Neighbourhood Plan to meet the basic conditions. Consideration has also been given to the need to extend the referendum area beyond the neighbourhood area but it has been determined that this is not necessary.

5. How decision is to be funded

Once the decision has been made to proceed to referendum, a claim for £20,000 from MHCLG can be made in the next available claim window. This represents a contribution towards the Council's costs associated with fulfilling its duty to assist the Parish in the preparation of its plan, and the costs

associated with the examination process (including the examiner) and the referendum. Any costs in excess of £20,000 will need to be borne by the Council, though it is not anticipated that the examination process and the referendum combined will be more than this amount. Costs associated with assisting the neighbourhood plan group to prepare their Plan are funded from the Plans and Strategies Reserve.

6. Conflicts of interest

| Name of all Executive members who were consulted AND declared a conflict of interest. | Nature of interest | Did Standards Committee give a dispensation for that conflict of interest? (If yes, give details and date of dispensation) | Did the Chief Executive give a dispensation for that conflict of interest? (If yes, give details and the date of the dispensation). |
|---------------------------------------------------------------------------------------|--------------------|----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| | | | |

The Mayor has been consulted on this decision

Signed: 

Date: 29th June 2020 Name of Decision Taker: Mayor Dave Hodgson

This is a public document. A copy of it must be given to the Chief Officer Legal and Democratic Services as soon as it is completed.

Date decision published:29 June 2020.....

Date decision can be implemented if not called in:9 July 2020.....

(Decision to be made exempt from call in.....NO.....)

Bedford Borough Council – Report to the Mayor

Date – June 2020

Report by the Chief Officer Planning & Infrastructure Development

Subject: BROMHAM NEIGHBOURHOOD PLAN

1. Executive Summary

Neighbourhood plans are statutory development plans produced by parish/town councils or neighbourhood forums. Bromham Parish Council has produced a neighbourhood plan for the Bromham parish area.

The Plan was submitted to Bedford Borough Council on 17 January 2020 and in line with regulatory requirements, was subject to a six-week consultation (27 January to 9 March 2020). It has since been formally examined by Ms Wendy Burden BA(Hons) DipTP MRTPI who is an independent examiner.

The examiner has produced a report (Appendix A) which recommends that the Plan is modified in order to meet legal requirements and is then progressed to a referendum of people who live within the designated neighbourhood area.

Bedford Borough Council must decide:

- whether to progress the Plan to a referendum and
- whether to modify it (in the ways recommended by the examiner or otherwise) or
- whether to refuse the Plan.

The Council must consider each of the examiner's recommendations on the content of the Plan and decide what action to take. If the Plan is to progress to referendum, the council must also decide whether the referendum area should be extended beyond the neighbourhood area, which in this case is Bromham Parish.

2. Recommendations

The Mayor is asked to consider this report and if satisfied agree:

- To make modifications to the Bromham Neighbourhood Plan in line with the recommendations set out in the examiner's report (Appendix A) and that as modified (Appendix B), the Plan meets the basic conditions
- That the formal Decision Statement (Appendix C) be published by 10 July 2020 in order to comply with the statutory deadline, and to inform those interested about the Council's decision
- To make arrangements to progress the Plan to the referendum stage of plan preparation
- That the designated Bromham Neighbourhood Area represents the appropriate geographical area to be covered by the referendum

3. Reasons for Recommendations

To give information about the outcome of the Bromham Neighbourhood Plan examination and to secure agreement to progress the Bromham Neighbourhood Plan to referendum, which is the next stage of the plan-making process.

4. Key Implications

(a) Policy

Neighbourhood plans are examined to ensure that they meet the 'Basic Conditions' which are set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). The 'Basic Conditions' ensure, amongst other things, that appropriate regard has been had for local and national policies. 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 (in this case saved policies in the Local Plan 2002, continuing policies in the Allocations and Designations Local Plan 2013 and the Local Plan 2030);
- Be compatible with and not breach European Union (EU) obligations; and
- Meet prescribed conditions and comply with prescribed matters.

Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended) prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

(b) Legal Issues

The scope of a neighbourhood plan examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). 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). 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 examiner must also consider if the neighbourhood plan is compatible with the Convention on Human Rights.

On receipt of the examiner's report, the Neighbourhood Planning (General) Regulations 2012 require that a Local Planning Authority must publish a decision statement setting out what actions will be taken in response to each of the examiner's recommendations. If the authority proposes to accept the examiner's recommendations, a decision statement must be published within 5 weeks of receiving the examiner's report. Arrangements for the referendum must then commence.

If the authority proposes to make a decision which differs from that recommended by the examiner, it must notify relevant people and invite representations for a period of 6 weeks. The local planning authority may, if it considers it appropriate to do so (for example if the Council's proposed changes are significant or controversial), refer the issue to further independent examination and receive a further report. Once any period for further representations is over, the local planning authority must issue its final decision within 5 weeks and proceed to referendum.

In this case it is recommended that the examiner's proposed amendments are accepted. If this is agreed, the decision statement relating to the Bromham Neighbourhood Plan must be published by 10 July 2020.

The neighbourhood plan passes the referendum of local voters if it achieves a simple majority (i.e. 50% +1 or over). No minimum turnout is required. If a plan passes referendum, the council must 'make' (adopt) it as soon as reasonably practicable unless the Council considers that the plan breaches EU obligations or human rights legislation. If there is a majority 'No' vote or a tied vote then the neighbourhood plan will not come into legal force.

The Council must normally hold a referendum within 56 working days from the date that the decision to take the plan forward to a referendum is published, however due to Covid19 restrictions, Neighbourhood Planning Referendums cannot be held before 6 May 2021. This is outlined in the Local Government and Police and Crime Commissioner (Coronavirus) Postponement of Elections and Referendums (England and Wales) Regulations 2020. The Council must publish notice that the referendum will take place not fewer than 28 days before the referendum date.

The Neighbourhood Planning (Referendums) Regulations 2012 (as amended) cover all aspects of organising and conducting polls.

The Referendum question is 'Do you want Bedford Borough Council to use the neighbourhood plan for Bromham Parish to help it decide planning applications in the Neighbourhood Area'.

Decisions to proceed to referendum and to 'make' the neighbourhood plan are taken by Bedford Borough Council's Executive rather than Full Council.

Bedford Borough Council can be challenged on the making of the plan by way of judicial review. Challenges must normally be made within six weeks of the making of the plan.

(c) Resource Implications

The Government provides funding to assist councils to fulfil their neighbourhood planning duties. Because plans that have passed examination cannot progress swiftly to referendum, MHCLG have changed when claims can be made. A claim for £20,000 can now be made when the local planning authority issues a decision statement (as set out under Regulation 25 of the Neighbourhood Planning (General) Regulations 2012) detailing its intention to send the plan to referendum (rather than when a referendum date has been set). The next available claim window is yet to be announced. This funding represents a contribution towards the Council's costs associated with fulfilling its duty to assist the Parish Council in the preparation of its plan, and the costs associated with the examination process (including the examiner) and the referendum. Any costs in excess of £20,000 will need to be borne by the Council, though it is not anticipated that the examination process and the referendum combined will be more than this amount. Costs associated with assisting the neighbourhood plan group to prepare their Plan are funded from the Plans and Strategies Reserve.

When the neighbourhood plan is formally 'made', the percentage of community infrastructure levy (CIL) receipts payable to the Parish Council arising from development within the parish will increase from 15% to 25% resulting in Bedford Borough Council's percentage decreasing to 75%. National Planning Practice Guidance explains that parish councils must use the CIL receipts passed to them to support the development of the parish council's area by funding the provision, improvement, replacement, operation or maintenance of infrastructure; or anything else that is concerned with addressing the demands that development places on the area.

(d) Risk Implications

The recommendations in the examination report are not binding, but if the Council chooses not to agree with the examiner's recommendations without a sound reason, there is a risk of legal challenge which could lead to reputational damage and financial costs. Whilst there is also a risk of legal challenge if the Council does follow the examiner's recommendations, it must be considered that the risk is lower.

Any modifications made to the content of the plan should be done so only in order to make the plan meet the basic conditions and other legislative requirements. Making modifications for any other reasons (other than formatting or spelling corrections) could lead to a legal challenge.

(e) Environmental Implications

The Bromham Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by Bromham Parish Council with assistance from Bedford Borough Council. The SEA screening concluded that it was unnecessary to undertake SEA. The examiner supported this conclusion.

The Plan was further screened to determine if Habitats Regulations Assessment (HRA) was necessary. The HRA was carried out by specialist consultancy Bodsey Ecology Ltd. It concluded that the Plan would not have a significant effect on European sites either alone or in combination. Natural England, which was consulted on the Plan, did not dispute this conclusion. The examiner found no reason to disagree.

Both the SEA screening and the HRA have been reviewed in light of the proposed modifications to the Plan. The conclusions of both remain unchanged.

(f) Equalities Impact

In preparing this report, due consideration has been given to the Borough Council's statutory Equality Duty to eliminate unlawful discrimination, advance equality of opportunity and foster good relations, as set out in Section 149(1) of the Equality Act 2010.

A relevance test for equality has been completed. The equality test determined that consideration as to whether the Bromham Neighbourhood Development Plan should progress to referendum has no relevance to Bedford Borough Council's duty to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. An equality analysis for this decision is not needed.

However, the development of the Bromham Neighbourhood Development Plan is relevant to Bromham Parish Council's General Equality Duty. The Parish Council is responsible for discharging their duty. An equality analysis has been carried out by the Parish Council. The findings can be found on the Bromham Parish Council [website](#).

5. DETAILS

General background

Neighbourhood planning was introduced through the Localism Act 2011. New powers allow qualifying bodies (parish or town councils, or neighbourhood forums in areas without parish or town councils) to produce neighbourhood plans which enable communities to set planning policies for their area. Once adopted, neighbourhood plans become part of the Council's statutory development plan and must be taken into account alongside Bedford Borough Council's local plans and national policy when planning applications are determined.

Producing a neighbourhood plan allows parish and town councils to increase the amount of Community Infrastructure Levy (CIL) funds they receive from developments within their area from 15% to 25%, incentivising the production of plans, especially those that propose growth.

The stages of preparation of a neighbourhood plan are similar to those for the preparation of a local plan. They are summarised in the following table.

| Preparing a neighbourhood plan | | |
|---------------------------------------------|----------------------------------------------------------------|--------------------|
| Stage | Responsibility | Progress |
| Neighbourhood Area Designation | Application by parish council, publicity & decision by BBC | Complete |
| Prepare draft neighbourhood plan | NP group/parish council with assistance from others | Complete |
| Pre submission consultation (Regulation 14) | NP group/parish council (6 weeks minimum) | Complete |
| Finalise plan in light of comments made | NP group/parish council | Complete |
| Submit plan to the local planning authority | NP group/parish council | Complete |
| Pre-examination consultation(Regulation 16) | BBC (6 weeks minimum) | Complete |
| Examination | Examiner appointed by BBC (agreed by NP group/ parish council) | Complete |
| Consider examiner's recommendations | BBC and NP group/parish council | We are here |
| Referendum | Organised by BBC | |
| Plan 'made' (part of the development plan) | BBC | |

The examination

Neighbourhood plans must be examined by a suitably qualified independent person, appointed by the Council and agreed by the qualifying body.

The neighbourhood plan examiner's role is limited to considering whether the neighbourhood plan meets the basic conditions and other relevant legal requirements. The examiner does not consider whether the plan is sound. The examiner also considers whether the referendum area should be extended beyond the neighbourhood area.

Most neighbourhood plan examinations will not require a hearing session to be held though this is an option if the examiner considers it necessary.

Legislation requires that the Council considers each of the recommendations made by the examiner in his/her report and decide what action to take in response. This decision must be published within five weeks of the receipt of the examiner's report.

However, if the authority proposes to make a decision which differs from that recommended by the examiner, it must notify relevant people and invite representations. This is further explained in the 'Legal Issues' section above.

If the plan proceeds to referendum and passes by a simple majority, Legislation does not allow any further amendments to be made to the plan. Therefore, the stage between examination and referendum (this stage) is the only point at which further amendments can be made.

The referendum

Anyone who can usually vote in a local election and who is resident in the referendum area can vote in a neighbourhood plan referendum. The referendum area is usually the neighbourhood area, but the examiner may recommend that it be extended if there are matters that are of interest to nearby communities. The plan must pass by a simple majority and there is no minimum turnout. If a simple majority is achieved the Council will be required to 'make' (adopt) the plan unless it breaches EU or human rights legislation.

The decision on when to hold the referendum falls to the Council's returning officer. Due to restrictions imposed by Covid19 and the change in Regulations, Neighbourhood Plan referendums cannot be held before 6 May 2021.

The qualifying body (the parish council or neighbourhood forum) can withdraw a plan at any time.

The Bromham Neighbourhood Plan

| Progress of Bromham Neighbourhood Plan | |
|-----------------------------------------------|---------------------------------|
| Neighbourhood area designated | 18 August 2014 |
| Draft plan consultation (Regulation 14) | 25 February to 8 April 2019 |
| Post submission consultation (Regulation 16) | 27 January 2020 to 9 March 2020 |
| Submitted for examination by BBC | 18 March 2020 |
| Examiner's report received | 5 June 2020 |

The following extract from the examiner's report summarises her findings. The full report can be found at Appendix A.

Main Findings - Executive Summary

From my examination of the Bromham 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) – Bromham Parish Council;

- The Plan has been prepared for an area properly designated – the Parish of Bromham as shown on Map 1 on page 4 of the Neighbourhood Plan;
- The Plan specifies the period to which it is to take effect: to 2030; 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.

The examiner proposes eight specific recommendations as follows:

| Proposed modification number (PM) | Page no./ other reference | Modification | Reason for recommendation |
|------------------------------------------|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| PM1 | P13 Policy HA1 | Delete the first paragraph. Insert “The sites set out below and shown on Map 2 are allocated for residential development. Any proposal for the development of an allocated site must meet the requirements of the relevant Policies of the Bedford Borough Council development plan before planning permission will be granted.” | To ensure that the sites are allocated and to require that they comply with other relevant development plan policies. |
| PM2 | P13-14 Policy HA2 | Delete Policy HA2. | No justification has been given for including an overall requirement for the phasing of each of the allocations in the BNP. |
| PM3 | P19 Policy AH1 and AH2 | Delete Policy AH1. Policy AH2: in line 4 delete “should” and insert “shall”. | Since the remainder of Policy AH1 is comprehensively addressed by the provisions of BBLP 2030 Policy 58S, I recommend its deletion. |

| Proposed modification number (PM) | Page no./ other reference | Modification | Reason for recommendation |
|-----------------------------------|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PM4 | P24-25 Policy BP | <p>BP1: add to existing, "Provision for the requirements listed within this Policy shall be included within a planning application for the development of the site. A Section 106 Agreement which includes the timescale for implementation of the provisions shall be concluded prior to the grant of any planning permission."</p> <p>BP2: in line 2 delete "that would" and insert "required to"; in line 4 delete "should" and insert "shall".</p> <p>BP3: delete "should" and insert "shall".</p> <p>BP4: in line 1 delete "should" and insert "shall"; in line 3 delete "should" and insert "to"; in line 4 delete "should" and insert "shall"; in line 5 delete "would" and insert "are to"; in line 6 delete "would" and insert "will".</p> <p>BP5: in line 1 delete "should" and insert "shall"; in line 2 delete "this could" and insert "to".</p> <p>BP7: delete the first sentence and before "The potential –" insert "An assessment of commercial demand for a retail unit to serve the new neighbourhood shall be submitted to the local planning authority as part of the application for detailed planning</p> | <p>To make clear that the provisions which are identified are requirements which are to be met, rather than optional or desirable facilities.</p> <p>No indication is given in the policy as how the commercial demand for a shop unit may be assessed. As submitted this part of the policy is aspirational and lacks clarity as to its deliverability, which is in variance with national policy.</p> |

| Proposed modification number (PM) | Page no./ other reference | Modification | Reason for recommendation |
|-----------------------------------|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <p>permission of the development. The new unit to be located within Beauchamp Park with". After "amenity" delete "would also need".</p> <p>BP8: in line 1 delete "should" and insert "shall"; after "development" insert "in accordance with the requirements of the Highway Authority."</p> <p>BP9: in line 1 delete "should" and insert "shall".</p> <p>BP10: in lines 1, 3, 5 on page 23 delete "should" and insert "shall". In first bullet point on page 24 delete "should" and insert "shall". After "provided to" insert "discourage the passage of vehicular traffic through the scheme from Peacock Road and Barker Drive and to".</p> <p>After "Highway Design Guidance" insert new bullet point "Subject to agreement with the Highway Authority measures to increase pedestrian and cyclist safety should include the provision of a safe pedestrian and cycle crossing of Stagsden Road between the northern and southern segments of Beauchamp Park to provide access to the Village Oval and other recreational facilities."</p> | <p>This will provide clarity as to when the consideration of commercial demand for a new shop should be carried out by the developer of the site.</p> <p>To make it clear what the improvements will be.</p> <p>In order to discourage traffic movements through the village, the bus service will not extend to Barker Drive, and it is intended to design the internal road network to deter the passage of vehicular traffic through the scheme whilst maintaining pedestrian and cycle connectivity.</p> <p>To secure delivery of community infrastructure.</p> |

| Proposed modification number (PM) | Page no./ other reference | Modification | Reason for recommendation |
|-----------------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| | | <p>OS2 in line 2 delete “that would” and insert OS4: add to policy wording, “A Section 106 Agreement will be completed between the local planning authority and the developer of Badmham Park Estate to provide for the provision and future maintenance of the pedestrian and cycle track to the grant of planning permission for the residential development of Old Estate Yard. The track shall be completed and open for use prior to the occupation of the first new dwelling.” OS5 in draft of “Local Plan”, “Provision of pedestrian and cycle space shall be included within the planning application for the development of this site. A Section 106 Agreement shall include the timescale for the provision of the public green open space shall be tracked shall be tracked prior to the grant of planning permission.”</p> | |
| PM7 | P30 Policy HA4 | <p>Second paragraph in the first line delete the first line and insert “shall”. “should” and insert “shall”.</p> | <p>To change form conditional to the imperative tense, so that the policies meet the Basic Conditions.</p> |
| PM8 | P33-34 Paragraph B.10.2 Policy CI.1 | <p>Paragraph B.10.2: in the second sentence delete after “listed” and insert “within the site specific policies to ensure that they are incorporated within future planning applications for the allocated sites. They contribute to the achievement of the</p> | <p>To indicate that community infrastructure will be provided through the development of the allocated sites.</p> |

| Proposed modification number (PM) | Page no./ other reference | Modification | Reason for recommendation |
|-----------------------------------|---------------------------|---------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <p>following objective.”</p> <p>Delete Policy CI 1.</p> | <p>Since the provisions identified in Policy CI.1 are more appropriately to be included within the site specific policies, I recommend Policy CI 1 be deleted</p> |

These recommendations serve to ensure that the plan meets the basic conditions. Officers therefore recommend that they are agreed and the Bromham Neighbourhood Plan be amended accordingly.

The examiner explains that it is open to the Parish Council to make minor modifications to the Plan such as attending to typographical errors (para 4.4 of the examiner’s report). A small number of these have been identified. Officers recommend however that no further changes are required in order for the Plan to meet the basic conditions and therefore if agreed, no further consultation is necessary before proceeding to referendum.

The Bromham Neighbourhood Plan incorporating the examiner’s proposed modifications and other minor modifications can be found at Appendix B.

Examination area

The examiner considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. She concluded that the Plan as modified would have no policies or proposals which she considered significant enough to have an impact beyond the designated Neighbourhood Plan boundary. As a result she recommends that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area. Officers agree with this conclusion and recommend that the neighbourhood area as designated should be agreed as the referendum area.

Next steps

Bedford Borough Council must publish a statement (Appendix C) setting out with reasons its decision on each of the examiner’s recommendations. Preparations must then be made to hold the referendum.

6. **Summary of Consultations and Outcome**

The Plan has been the subject of two statutory consultations. The neighbourhood plan group carried out pre-submission consultation on a draft plan, known as Regulation 14 stage, and the Council undertook post-submission consultation; the Regulation 16 stage. Details of the Regulation 14 responses are included in the Consultation Statement which is part of the evidence base for the Neighbourhood Plan and can be found on the Council's [website](#). The Regulation 16 responses were provided to the examiner of the Plan who considered them during the examination. They can be found on Bedford Borough Council's web-site on the [neighbourhood planning pages](#).

The following people have been consulted in preparing this report:

Management Team
Team Leader (Governance, Property, Planning, Litigation)
Manager (Business Partner) for Environment, Enabling, Law & Governance
Chief Officer for Corporate Finance & Pensions

No adverse comments have been received.

7. **Ward Councillor Views**

Not applicable for this report.

Report Contact Officer: Kim Wilson

File Reference: Neighbourhood Plans

Previous Relevant Minutes: None

Background Papers: None

Appendices: Appendix A - Examiner's Report
Appendix B - Bromham Neighbourhood Plan showing modifications
Appendix C – Decision Statement



Intelligent Plans
and examinations

Report on Bromham Neighbourhood Plan - 2030

An Examination undertaken for Bedford Borough Council with the support of Bromham Parish Council on the January 2020 submission version (updated March 2020) of the Plan.

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

Date of Report: 5 June 2020

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Main Findings - Executive Summary

From my examination of the Bromham 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) – Bromham Parish Council;
- The Plan has been prepared for an area properly designated – the Parish of Bromham as shown on Map 1 on page 4 of the Neighbourhood Plan;
- The Plan specifies the period to which it is to take effect: to 2030; 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

Bromham Neighbourhood Plan - 2030

- 1.1 The Neighbourhood Plan Area comprises the Parish of Bromham, which covers an area of 820 hectares some 4 miles north west of Bedford, within Bedford Borough Council (BBC). Bromham is a large and attractive rural village with a population in excess of 4,950 at the 2011 Census. Heritage assets which contribute to the character and appearance of the village include St Owen’s Church, Bromham Hall, Bromham Mill, the Village Road school site, Bromham Bridge and several privately owned listed buildings. The village also benefits from attractive green areas which include Bromham Park, the Green and Vicarage Green, together with three fragments of ancient woodland. These areas contribute to the pattern of green spaces which characterise the village.
- 1.2 Bromham village is well served by shops, public houses, a garage and community facilities, which has given the village Rural Key Service Centre status within Bedford Borough. It has close links with both Bedford and Milton Keynes with easy access to a number of trunk roads, the motorway network and the rail network from Bedford Railway Station. Although the village has close links with the town of Bedford, the River Great Ouse and the A428 provide natural boundaries between the Parish and the town. An

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issue raised by local residents is that Bromham should maintain its identity and integrity and this concern has influenced the identification of potential new housing sites within the Neighbourhood Plan Area.

- 1.3 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 in January 2020. The BNP 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 BNP has had close regard to the policies that were emerging in the preparation of the BBLP 2030.¹
- 1.4 The Bromham 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. In view of the changed status of the BBLP 2030 in January, I asked for a review of Table 1 of the submitted Basic Conditions Statement to be undertaken in order to identify the level of compliance between the BNP and the statutory BBLP 2030. I address the matter of general conformity of the BNP with the strategic policies of the Development Plan throughout my report.

The Independent Examiner

- 1.5 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 Bromham Parish Council (BPC).
- 1.6 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

- 1.7 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.
- 1.8 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:

¹ PPG Reference ID: 41-009-20190509.

- 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').

1.9 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

1.10 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.

- 1.11 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 ensure that the BNP reflected the reasoning and evidence informing the local plan process and recognised the importance of minimising any conflicts between those policies in the Neighbourhood Plan and those in the emerging Local Plan during its preparation. 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 Plan³. The BNP covers the same period as the adopted BBLP 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

Submitted Documents

- 2.4 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted in March 2020. These comprise:
- Bromham Neighbourhood Plan, January 2020;

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.

- Bromham Parish Map;
- Basic Conditions Statement, January 2020;
- Consultation Statement;
- Supporting Document 1 - Community Engagement Strategy, November 2014;
- Supporting Document 2 Village Questionnaire, 2015;
- Supporting Document 3 Housing Needs Survey, 2015;
- Supporting Document 4 Issues and Options Paper on Housing and Education and explanatory material relating to Old Stable Yard Development, 2016;
- Supporting Document 5 Consultation Exercises - Summary of Findings;
- Supporting Document 6 Strategic Environmental Assessment screening report;
- Supporting Document 7 Bedford Borough Council's Site Assessment and Selection Methodology;
- Supporting Document 8 Bedford Borough Council's Highway; Access and Transport Surveys of Bromham Sites;
- Supporting Document 9 Summary of Site Assessments;
- Supporting Document 10 Housing Needs Survey Report, 2015;
- Supporting Document 11 Flood-Risk Sequential Test – Bromham Neighbourhood Area, November 2019;
- Supporting Document 12 CFA Archaeology – Archaeological Survey Land off Stagsden Road;
- Supporting Document 13 Landscape Collective – Advice Note on Landscape, Heritage and Archaeology, September 2017;
- Supporting Document 14 Bedford Borough Council Historic Environment Record relating to Bromham;
- Supporting Document 15 Ecological Survey of Salem Thrift and Moliver's Wood, May 2017;
- Supporting Document 16 Habitat Regulations Assessment, October 2018;
- Regulation 16 consultation responses;
- Joint responses from BPC and BBC of 1 April and 13 May 2020 to my questions of 19 March and 30 April 2020;
- Larger scale Map 5; and
- Letter from Rainier Developments Ltd of 21 May in response to my questions of 30 April and the letter in response from BPC and BBC dated 13 May 2020.

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

2.5 In respect of the joint response provided to my questions by BPC and BBC on 1 April 2020, I was provided with an updated version (dated 31 March 2020) of the BNP (and the Basic Conditions Statement), to which all references in this report refer.⁶

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

⁶ View at footnote 5 above.

Site Visit

- 2.6 I visited the Neighbourhood Plan Area unaccompanied by any interested party on the 29 April 2020.⁷ 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

- 2.7 This examination has been dealt with by written representations. There were some requests to be heard in representations received as a result of the Regulation 16 Consultation.
- 2.8 However, 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 both BBC and the QB in response to my letters of 19 March and 30 April 2020 (and a further response from Rainier Developments Ltd).⁸ 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.

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 Bromham Neighbourhood Plan has been prepared and submitted for examination by BPC, which is the QB for an area that was designated by BBC on 18 August 2014.
- 3.2 It is the only Neighbourhood Plan for Bromham Parish and does not relate to any land outside the designated Neighbourhood Plan Area.

⁷ Following the production of a risk assessment (in view of the COVID-19 restrictions in place at that time), my site visit was officially authorised by Bedford Borough Council.

⁸ View at: <https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/neighbourhood-planning/bromham-neighbourhood-development-plan/>

Plan Period

- 3.3 The Plan specifies clearly the period to which it is to take effect in paragraph 1.1, which is to the year 2030. The Plan states the date prominently on the front cover.

Neighbourhood Plan Preparation and Consultation

- 3.4 A summary of the consultation exercises undertaken in the preparation of BNP is set out in submitted Document 5. BPC launched its neighbourhood planning exercise at a public event in the Village Hall on 20/21 February 2015 which was attended by over 350 people. The Bromham Neighbourhood Plan Steering Group (BNPSG) comprising residents and Parish Councillors set out potential themes for the BNP and ideas for other themes were invited. A request for volunteers to the BNPSG was published at this event and the invitation was repeated in June 2015. In July 2015, a village questionnaire and a housing needs survey was circulated to all residential and non-residential properties in Bromham. Some 593 responses were received to the questionnaire, with 84 responses to the housing needs survey.
- 3.5 The questionnaire document included the map of potential housing development sites provided by BBC. A public event at the Village Hall in April 2016 exhibited the findings of the questionnaire together with details of the potential redevelopment of Old Stable Yard at Hall Farm to clarify the extent of the proposal. The children at the village schools were consulted in 2016 and the local business community was engaged through an event in September 2016.
- 3.6 Later that year an Issues and Options Consultation covering housing and education matters was circulated to all households. This identified the sites which were being considered to accommodate the 500 new homes required in the then emerging BBLP 2030. Some 484 responses were received, which provided clear views as to the preferred locations for development and the types of future housing. In March 2018, the emerging findings for the BNP were publicised at a public event in the Village Hall. This was attended by some 278 people.
- 3.7 There has been some objection to the scale of new housing which was required for Bromham, and there remains some disagreement as to the best choice of site for the new housing. However, the location of the majority of the new housing to the west of the village, close to the A428 was broadly supported. 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 25 February and 8 April 2019. The consultation was publicised on the seven Parish Council notice boards throughout the village. A leaflet was distributed to all Bromham dwellings (about 2000) as well as to shops and other services and organisations in the village. This provided details

of where copies of the documents could be accessed and how representations could be made. Statutory bodies were consulted in accordance with the requirements of the Regulations. The consultation was also highlighted on the front page of the March 2019 edition of Bromham Broadsheet, which is delivered to every home and non-residential premise in Bromham.

- 3.9 Some 65 responses were received of which 54 were from local residents, or individuals. 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.
- 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 January 2020 and closed on 9 March 2020. This led to 39 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 Part B 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 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 BNP 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 A Habitats Regulations Assessment 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 emerging neighbourhood plans to confirm this for all developments. Further screening of the Bromham Neighbourhood Plan has been carried out to ensure that there were no unforeseen likely significant effects.
- 4.3 This screening of the BNP 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 BNP (AA Stage 2) some rewording of the policies of the BNP 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.
- 4.4 The HRA concludes that the Bromham 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.
- 4.5 The BBLP 2030 identifies Bromham as a key growth village which should accommodate an additional 500 new dwellings to reflect its status as a Rural Key Service Centre. As part of the preparation of the BBLP 2030, there was a call for sites by BBC in 2014. In the selection of the sites to be allocated for new housing in the BNP, BBC's site assessment and selection methodology was adopted to help inform the process. 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 the BNPSG has taken an appropriate and thorough approach to the consideration of reasonable alternatives in the assessment of housing sites in the preparation of the BNP.

Main Issues

- 4.6 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

Regard to National Policy and Advice

- 4.7 The BNP sets out the background and context to its preparation and provides a broad description of the character and appearance of the Plan

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area, with its attractive village and rural setting. The main objective of the BNP is to allocate land for new housing, but the Vision of the Plan and its Aims seek to retain the identity and integrity of the village, minimise the impact of additional traffic generated by new development, maintain access to Bromham Park and other green spaces and footpaths and enhance the value of Bromham Mill to village residents and other local people.

- 4.8 In the BBLP 2030 Bromham is identified as a Rural Key Service Centre. To deliver sustainable development and growth which will enhance the vitality of the Borough's urban and rural communities, Bromham is identified for the location of strategic residential development of some 500 new homes. The BNP allocates sufficient land for housing to meet the requirement in the BBLP 2030 over the next 10 years. Furthermore, the BNP has provided the local community with the opportunity to influence the type, design, location and mix of new development in accordance with national and local plan policies.
- 4.9 A neighbourhood plan may allocate more land than is required to accommodate the level of new housing specified in the local plan, but it may not allocate less land than is required. Through the identification of land to accommodate the 500 new homes required in the BBLP 2030, the BNP has complied with national policy and advice. The main issue of compliance in the BNP which I identify relates to the requirement in NPPF paragraph 16 d) for policies to be "clearly written and unambiguous". PPG further states a policy in a neighbourhood plan should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.⁹ Some of the policies require modification to provide clarity as to what constitutes a requirement of the policy and what might be a desirable consequence. This is a matter which can be dealt with through modifications which I address in relation to each of the policies later in the report.

Contributes to the Achievement of Sustainable Development

- 4.10 By taking a positive approach to the delivery of residential development in accordance with the BBLP 2030, the BNP provides for sustainable development through its site allocations and policies. Whilst the Plan focuses primarily on the allocation of housing land, in doing so it has regard to the economic, social and environmental needs of the local community. 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.
- 4.11 Section B.3 of the BNP addresses sustainable development and refers to requirements in the policies of the BBLP 2030 relating to energy efficiency, water, habitats and species. Together with the policies of the

⁹ PPG Reference ID: 41-041-20140306.

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BBLP 2030, the policies and proposals of the BNP contribute to the achievement of sustainable development in accordance with national policies and advice.

- 4.12 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

- 4.13 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 recently adopted BBLP 2030, I requested that Table 1 of the Basic Conditions statement be updated to indicate the extent to which the policies as submitted in the BNP March 2020 are in accord with those in the adopted BBLP 2030.
- 4.14 The need for the BNP to generally conform with the strategic BBLP 2030 is acknowledged in paragraph A.1.3. Early drafts of the BBLP covered the period to 2035 and that was the intention for the BNP. However, to align with the BBLP 2030 the BNP would need to provide land which would enable 500 new homes to be delivered by 2030. To meet this requirement, the period covered by the BNP has been identified to mirror that of the BBLP 2030 as adopted.
- 4.15 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 Allocation Policies

- 4.16 In the BBLP 2030, Policy 3S identifies the Spatial Strategy for the Borough with strategic residential development to take place in key service centres. The amount and distribution of development between settlements in the Borough is set out in Policy 4S. Bromham is required to identify sites to provide 500 homes generally in and around defined Settlement Policy Area Boundaries. All sites are to be allocated in neighbourhood development plans.
- 4.17 The overall level of development identified in BBLP 2030 Policy 4S is stated to be a minimum of 3,169 dwellings. The policy then sets out the levels of development expected to be provided in identified locations. The

sum of the list of allocations expected by 2030 is well in excess of the minimum figure of 3,169, and as a result I consider that the figure of 500 dwellings allocated to Bromham should not be regarded as a minimum figure which the BNP should seek to exceed.

- 4.18 In the BNP, the policy objectives relating to the location of new housing in the village are set out under paragraph B.1.5. Policy HA1 then lists the sites to be allocated for housing to meet the requirement in the BBLP 2030 for 500 new dwellings.
- 4.19 Having regard to the process of site assessment and selection which has been carried out in the preparation of the BNP, and the evidence submitted for the examination, I am satisfied the allocations in Policy HA1 are soundly based and capable of being developed within the Neighbourhood Plan period. The large sites on the west side of the village are appropriately located in relation to the village centre and the strategic road and public transport networks. The smaller site at Old Stable Yard mainly comprises previously developed land and its release for development would accord with Government policy.
- 4.20 I have referred to the need for policies to be clearly written and unambiguous to ensure that there can be no doubt as to the requirement of the policy. In Policy HA1 it states that the three sites "should be allocated for development". Clearly the release of the sites is provisional on any proposal being in accord with the other policies of the Development Plan, but the allocation of the sites should come first and be positively spelled out. I recommend the modification to the first paragraph of Policy HA1 to ensure that the sites are allocated and to require that they comply with other relevant development plan policies [**PM1**]. With this modification Policy HA1 meets the Basic Conditions.
- 4.21 The first part of Policy HA2 seeks financial contributions from developers of sites allocated for residential development towards improving local infrastructure. It is recognised in the NPPF that there will be circumstances where financial contributions from a developer are necessary to make a development acceptable in planning terms. However, these must be directly related to the development and fairly and reasonably related in scale and kind. As drafted, it is not clear from Policy HA2 in what circumstances any financial contributions would be required from developers or how they would be calculated.
- 4.22 Provision for the assessment of financial contributions from new development is made in BBLP Policy 33. This requires new development proposals to ensure that they will have no harmful impact on the adequacy of existing infrastructure such as utilities, schools, health and community facilities. Where any adverse impacts are identified, developers will be required to contribute towards measures to mitigate any harmful impact. This policy provides the overall context within which any proposal for the development of the sites listed in HA1 must be assessed. As a result, there is no need for a general requirement to be

repeated in the BNP¹⁰, and I therefore recommend that the first part of Policy HA2 be deleted.

- 4.23 The second part of HA2 requires a Phasing Plan to indicate the timescales for delivery. However, it is unlikely that such a plan would be necessary for all the sites in the BNP. Where a phasing plan is justified, reference should be included in the site specific policies and I consider these later in the report. No justification has been given for including an overall requirement for the phasing of each of the allocations in the BNP and therefore I recommend that the whole of Policy HA2 be deleted [**PM2**].
- 4.24 Policy HA3 requires the provision of safe, sustainable transport connections for new housing developments and lists examples of the way this may be achieved. The policy has appropriate regard for national policies and is in general conformity with local plan strategic policies and therefore meets the Basic Conditions.

Affordable Housing

- 4.25 The BNP has the objective that new housing development on the allocated sites should make provision for affordable housing as required by the policies of the BBC Development Plan which applies at the time the proposal comes forward. Policy AH1 seeks to implement that objective.
- 4.26 In the BBLP 2030, Policy 58S sets out in detail the requirements for the provision of affordable housing. Any proposal to develop the sites allocated in the BNP will be required to comply with this BBLP 2030 policy. As a result, there is no need for a policy in the BNP which basically refers back to the BBLP 2030 policy.
- 4.27 Policy AH1 does make an addition to the requirements in the BBLP policy through the reference to “high quality” affordable housing. However, through this requirement the BNP seeks a higher standard of development than that provided for in either the BBLP 2030 or in the NPPF. In the absence of any justification for such a higher standard, this requirement in the BNP conflicts with national policy and should be deleted.
- 4.28 Since the remainder of Policy AH1 is comprehensively addressed by the provisions of BBLP 2030 Policy 58S, I recommend its deletion [**PM3**].
- 4.29 Policy AH2 relates to housing mix within the allocated housing sites. The policy seeks to ensure that the housing needs which were identified through the 2015 Bromham Housing Needs Survey are provided for. This is an evidence based policy which complements the provisions of the BBLP. I recommend a modification to reflect the imperative rather than the conditional tense [**PM3**] and with this change the Policy meets the Basic Conditions.

¹⁰ NPPF, paragraph 16 f).

Site Specific Policies

- 4.30 In the BBLP 2030, Section 8 sets out detailed Place Making policies which include requirements for design quality and principles, green infrastructure, landscape, tree retention and hedgerows; the assessment and management of impacts in relation to design, access, disturbance and pollution, the River Great Ouse and infrastructure; the protection and enhancement of the historic environment and heritage, and biodiversity and geodiversity.
- 4.31 Any proposal for the development of a site allocated in the BNP will be assessed against the policies in the BBLP 2030. The BNP adds to the BBLP 2030 policies through the identification of specific requirements for each site in section B.4.
- 4.32 I have referred earlier in the report to the requirement in the NPPF paragraph 16 d) that policies be clearly written and unambiguous so that it is evident how a decision maker should react to development proposals. To ensure that the BNP complies with this requirement, I recommend some modifications to the wording of the policies to ensure that it is clear to a reader what constitutes a requirement of the policy and what might be negotiable or aspirational.
- 4.33 Taking first Policy BP, it is stated to be "Beauchamp Park Development and Requirements Policy". Where the policy is setting out requirements rather than aspirations, it would be more effective and less ambiguous if the use of the conditional tense was avoided. There are also some phrases which need to be changed to make clear that the provisions which are identified are requirements which are to be met, rather than optional or desirable facilities. I set out these recommended modifications in detail in **PM4**.
- 4.34 A Phase 1 Contaminated Land Assessment has been submitted in support of an outline planning application for Beauchamp Park to assess the potential for ground contamination from landfill. The assessment indicates this is most likely inert landfill made up of spoil from the A428 Bromham bypass construction during the 1990's. As such it would be unlikely to cause any hazard or reason to constrain the delivery of the development.
- 4.35 A standard condition would be attached to any planning permission to require further ground investigation prior to the start of development. In the event that it was found that the ground conditions would seriously delay the delivery of the site and affect the supply of housing within the Borough, this is a matter which may be addressed through the next review of the Development Plan.
- 4.36 In order to secure the delivery and implementation of the requirements of Policy BP, further wording is recommended to be added to BP1. This ensures that the provision of the various facilities and infrastructure listed in the Policy are included within the detailed plan for the site, and that an

appropriate agreement is secured with the developers of the site to ensure their implementation. That agreement should include timescales (or phasing) for implementation [**PM4**].

- 4.37 In relation to BP7, no indication is given in the policy as how the commercial demand for a shop unit may be assessed. As submitted this part of the policy is aspirational and lacks clarity as to its deliverability, which is in variance with national policy. I note that paragraph B.5.11 identifies the potential for a new shop unit if there is commercial demand. I recommend a modification to BP7 to require an assessment of the commercial demand for a shop to serve the new neighbourhood to be carried out and submitted as part of a detailed planning application. This will provide clarity as to when the consideration of commercial demand for a new shop should be carried out by the developer of the site [**PM4**].
- 4.38 BP8 seeks improvement to the sightlines to the north at the Stagsden Road/A428 traffic island without specifying what the improvement should be. Since it will be necessary for any improvement to meet the standard required by the relevant Highway Authority, I recommend some additional wording to make this clear [**PM4**].
- 4.39 I note that two vehicular access points are required to serve the main part of the Beauchamp Park site. The main access will be from Stagsden Road, and the other from Barker Drive. In order to discourage traffic movements through the village, the bus service will not extend to Barker Drive, and it is intended to design the internal road network to deter the passage of vehicular traffic through the scheme whilst maintaining pedestrian and cycle connectivity. I recommend a modification to the first bullet point of BP10 on page 24 to reflect this aim [**PM4**].
- 4.40 In order to secure delivery of the community infrastructure identified in Policy CI 1 (which I deal with below), I recommend some further additions to ensure that the requirements identified in Policy CI 1 for Beauchamp Park are provided for within Policy BP [**PM4**].
- 4.41 Policy SR sets out the requirements for the development of Stagsden Rise. As for Policy BP1, I recommend the insertion at SR1 of new wording to secure the provision of the various facilities and infrastructure listed in the policy. A number of changes to the text are also necessary, as recommended, to ensure that the requirements of the policy can be clearly identified and implemented. I also recommend some additions to include the provisions identified in Policy CI 1 which I address below. These are covered in **PM5**.
- 4.42 Policy OS sets out the requirements for the development of Old Stable Yard. As for Policies BP and SR, I recommend a number of changes to the text to ensure that the requirements of the policy are clearly identified. These are covered in **PM6**.

- 4.43 OS4 refers to a permissive link to be provided from the development site to the village. I noted at my site visit, the lack of footpaths along Lower Farm Road and consider that a pedestrian/cyclist route is necessary to ensure that residents of the 30 dwellings proposed for the allocation have a safe and sustainable route into the village centre. A suitable route could be provided on land which is in the same ownership as the proposed site and therefore there is a realistic chance that a link to the village can be delivered.
- 4.44 However, as submitted, the policy provides no timetable for the provision of the link and makes no provision for its future maintenance. I recommend changes to OS4 to ensure that an agreement is reached between the BPC and the landowners to provide for the provision and future maintenance of the link prior to the grant of planning permission on the site, and that the new link is provided prior to the occupation of any dwelling within the site [**PM6**]. The requirement for a pedestrian/cycle track is also identified in Policy CI 1. I set out my reasons for deleting that Policy below.
- 4.45 A modification is recommended to OS5 to secure the provision of the public green space [**PM6**].
- 4.46 Subject to the modifications which I recommend in the Appendix, the Site Specific Policies comply with the Basic Conditions.

Windfall Sites

- 4.47 It is a policy objective of the BNP to develop windfall sites within the Settlement Policy Area (SPA) where they provide efficient and effective use of available land. Proposals outside the SPA are subject to the provisions of BBLP 2030 Policy 7S, which sets out the circumstances in which development may be permitted elsewhere in the Neighbourhood Plan Area.
- 4.48 In the NPPF windfall sites are defined as “sites not specifically identified in the development plan”. In paragraph 68 it is stated that local planning authorities should “c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes”.
- 4.49 Policies HA4 and HA5 deal with windfall sites in the BNP within the existing SPA in accordance with the national policies and are in general conformity with the strategic local plan policies. With a modification to HA4 from the conditional to the imperative tense, the policies meet the Basic Conditions [**PM7**].

Community Infrastructure

- 4.50 The policy objective aims to ensure that developers of the allocated sites should contribute to the enhancement and improvement of facilities and

services in Bromham both within the development and more generally within the village.

- 4.51 Policy CI 1 identifies the priorities for additional community facilities. It identifies the provisions to be made in the Beauchamp Park and Stagsden Rise developments, and the requirement for a pedestrian/cycle track to support the Old Stable Yard development.
- 4.52 The submitted policy generally repeats the requirements which are identified in the site specific policies. The only additional requirement is CI 1b), which seeks the provision of a safe pedestrian and cycle crossing of Stagsden Road between the northern and southern segments of Beauchamp Park.
- 4.53 To avoid repetition within the BNP and to make it clear how the provisions sought in CI 1 are to be delivered, I have recommended that all the requirements in the policy are included within the relevant site specific policies. This would make it clear that it is the responsibility of the landowner/developer of each allocated site to incorporate or contribute to the provisions which are identified for that scheme. I recommend modifications to Policy BP [**PM4**], Policy SR [**PM5**] and Policy OS [**PM6**] to address these matters.
- 4.54 Some changes will also be required to the text in paragraphs B.10.2 to indicate that community infrastructure will be provided through the development of the allocated sites. Since the provisions identified in Policy CI.1 are more appropriately to be included within the site specific policies, I recommend Policy CI 1 be deleted [**PM8**].

Education Provision

- 4.55 The school in Bromham plays a central role in the community. It has recently been extended to accommodate three forms of entry and is being changed from a Lower School to a Primary School. However, with the new development allocated for the village, a fourth form of entry may be required to accommodate the children associated with the new development.
- 4.56 The BPC has participated in positive discussions with the education authority to identify a solution for the expansion of the school within its existing campus, and it is proposed to allow the increased use by the school of the existing village playing fields which are in the ownership of the BPC. Current users of the playing fields will have additional facilities available for their use within the Beauchamp Park development and will not therefore be disadvantaged.
- 4.57 Policies EP1 to EP4 identify the main issues to be addressed in the further development of the school and set out the position of the BPC to be adopted in future discussions with the education authority. Since the matters covered in these policies are for negotiation with the education

authority, it is appropriate for the use of the conditional tense to be retained. Initiatives pertaining to traffic issues which relate to the allocated sites are provided for in the site specific policies for those sites which complement the approach taken in EP3. I am satisfied that the policies relating to education provision meet the Basic Conditions.

Non Policy Actions

Part C – Community Issues and Aspirations

4.58 In addition to the BNP policies which I am required to consider against the statutory tests, Part C of the BNP addresses those issues which are aspirational. They relate to measures which may be sought in order to improve the general quality of life and well being within the village rather than land use issues which relate to the development and use of land in the statutory sense. Part C sets out actions to be taken by the community to help achieve their wider aspirations. Though I have taken note of these, they will not form part of the statutory development plan and are not therefore considered against the Basic Conditions. ¹¹

Part D – Implementing and Monitoring the Plan

4.59 Part D does not set out policies but lists the means by which the BNP will be delivered and monitored. It also identifies the BPC's priorities for the use of the Community Infrastructure Levy. Part D raises no issues of compliance with the Basic Conditions.

Factual and Minor Updates

4.60 Now that the BBLP 2030 has been adopted by BBC, I recommend that the BNP be updated to remove all references to the emerging or draft BBLP. 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 Bromham 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.

¹¹ PPG Reference ID: 41-004-20190509.

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- 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 Bromham 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 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. In doing so, the BPC and BNPSG have consulted with and taken into account the views of the local community, whilst seeking to realise the status of Bromham as a Rural Key Service Centre and provide for the level of new housing required in the BBLP 2030.
- 5.6 The Plan has achieved the difficult task of setting out positive proposals to enable Bromham to accommodate the requirement for new housing whilst seeking to reflect the wishes and aspirations of the local community. As a result, the BNP meets the Basic Conditions. With the modifications appended to my report, the BNP should provide an effective Plan for the management of the future planning of Bromham.

Wendy J Burden

Examiner

Appendix: Modifications

| Proposed modification number (PM) | Page no./ other reference | Modification |
|-----------------------------------|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PM1 | P13 Policy HA1 | Delete the first paragraph. Insert "The sites set out below and shown on Map 2 are allocated for residential development. Any proposal for the development of an allocated site must meet the requirements of the relevant Policies of the Bedford Borough Council development plan before planning permission will be granted." |
| PM2 | P13 Policy HA2 | Delete Policy HA2. |
| PM3 | P18 Policy AH1 and AH2 | Delete Policy AH1. Policy AH2: in line 4 delete "should" and insert "shall". |
| PM4 | P23-24 Policy BP | BP1: add to existing, "Provision for the requirements listed within this Policy shall be included within a planning application for the development of the site. A Section 106 Agreement which includes the timescale for implementation of the provisions shall be concluded prior to the grant of any planning permission." BP2: in line 2 delete "that would" and insert "required to"; in line 4 delete "should" and insert "shall". BP3: delete "should" and insert "shall". BP4: in line 1 delete "should" and insert "shall"; in line 3 delete "should" and insert "to"; in line 4 delete "should" and insert "shall"; in line 5 delete "would" and insert "are to"; in line 6 delete "would" and insert "will". |

| | | |
|--|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <p>BP5: in line 1 delete "should" and insert "shall"; in line 2 delete "this could" and insert "to".</p> <p>BP7: delete the first sentence and before "The potential -" insert "An assessment of commercial demand for a retail unit to serve the new neighbourhood shall be submitted to the local planning authority as part of the application for detailed planning permission of the development. The new unit to be located within Beauchamp Park with".</p> <p>After "amenity" delete "would also need".</p> <p>BP8: in line 1 delete "should" and insert "shall"; after "development" insert "in accordance with the requirements of the Highway Authority."</p> <p>BP9: in line 1 delete "should" and insert "shall".</p> <p>BP10: in lines 1, 3, 5 on page 23 delete "should" and insert "shall".</p> <p>In first bullet point on page 24 delete "should" and insert "shall".</p> <p>After "provided to" insert "discourage the passage of vehicular traffic through the scheme from Peacock Road and Barker Drive and to".</p> <p>After "Highway Design Guidance" insert new bullet point "Subject to agreement with the Highway Authority measures to increase pedestrian and cyclist safety should include the provision of a safe pedestrian and cycle crossing of Stagsden Road between the northern and southern segments of Beauchamp Park to provide access</p> |
|--|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | | |
|-----|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <p>to the Village Oval and other recreational facilities.”</p> <p>In the penultimate bullet point delete “should” and insert “shall”.</p> <p>In final bullet point insert before “An equipped”, “A new play area shall be provided to provide for a range of age groups together with”; delete “An” and insert “an”; delete “should” and insert “to”.</p> |
| PM5 | P26-27 Policy SR | <p>SR1: add to existing, “Provision for the requirements listed within this Policy shall be included within the planning application for the development of the site. A Section 106 Agreement which includes the timescale for implementation of the provisions shall be reached prior to the grant of any planning permission.”</p> <p>SR2, SR3, SR4, SR6, SR7, SR8, SR9: delete all cases of “should” and insert “shall”.</p> <p>SR2: in line 2 delete “that would” and insert “are required to”.</p> <p>SR4: add after “play area”, “covering a range of age groups.”</p> |
| PM6 | P29-30 Policy OS | <p>OS2, OS3, OS7, OS8: delete all cases of “should” and insert “shall”.</p> <p>OS2: in line 2 delete “that would” and insert “to”.</p> <p>OS4: add to policy wording, “A Section 106 Agreement shall be completed between the local planning authority and the landowner of Bromham Park Estate to provide for the design, provision and future maintenance of the pedestrian and cycle track prior to the grant of planning permission for the residential development of Old Stable Yard. The track shall be</p> |

| | | |
|-----|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <p>completed and open for use prior to the occupation of the first new dwelling.”</p> <p>OS5: add after “Local Plan”, “Provision of public green open space shall be included within the planning application for the development of the site. A Section 106 Agreement which includes the timescale for provision of the public green open space shall be reached prior to the grant of any planning permission.”</p> |
| PM7 | P30 Policy HA4 | Second paragraph: in the first line delete “should” and insert “shall”. |
| PM8 | P31–32 Paragraph B.10.2 Policy CI.1 | <p>Paragraph B.10.2: in the second sentence delete after “listed” and insert “within the site specific policies to ensure that they are incorporated within future planning applications for the allocated sites. They contribute to the achievement of the following objective.”</p> <p>Delete Policy CI 1.</p> |

Bromham Neighbourhood Plan Steering Group &
Bromham Parish Council



Draft

**BROMHAM
NEIGHBOURHOOD
PLAN - 2030**

Bromham Neighbourhood Plan Steering Group & Bromham Parish Council
Bromham Village Hall, Village Road, Bromham, MK43 8JP, Tel: 01234 828851,
email: NHP@bromhamparish.co.uk, www.bromhamparish.co.uk

Modifications recommended by the examiner. Strikethrough for deletion and bold for new text.

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PART A - Introduction and Context

A.1 – INTRODUCTION

A.1.1. Bromham's Neighbourhood Plan (the Plan) sets out a vision for Bromham in the period to 2030 and contains policies designed to achieve that vision. The Plan reflects the Government's approach to planning as set out in the Localism Act 2011, which gives local people a stronger voice in what happens in their area, and the National Planning Policy Framework.

A.1.2 The Plan was developed by a Steering Group comprising local people, led by Bromham Parish Council. The non-Parish Councillors on the Steering Group volunteered to assist in developing the plan in response to a request for volunteers published at the initial consultation event which launched the planning process in February 2015. The invitation was subsequently repeated in the June 2015 edition of the Bromham Broadsheet, which is delivered to every residential and non-residential property in the village. Since then, there has been extensive consultation with residents. The Plan was endorsed by Bromham Parish Council in December 2018: accordingly, all recommendations and views expressed are those of the Parish Council.

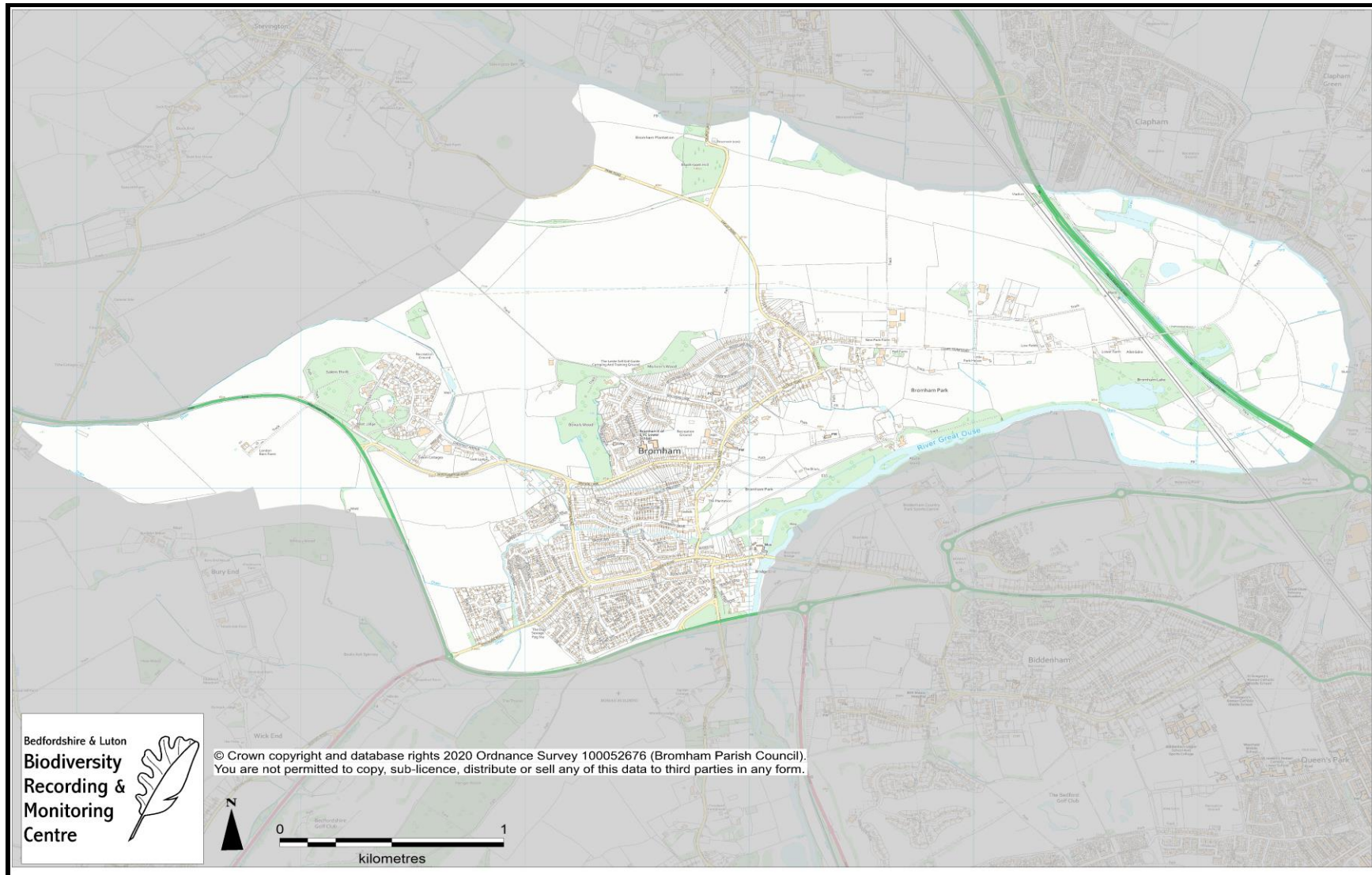
A.1.3 The planning process provided residents with an opportunity to express views about where future development should be located within the village and to comment on a range of other aspects of village life. The resulting plan aims to ensure the future wellbeing of our community. However, the Plan must accord with the wider planning framework at both national and local level, and in particular must conform to Bedford Borough Council's strategic planning priorities, as set out in Bedford Borough Local Plan 2030. Although the Borough Council's draft local plan now covers the period to 2030 only, its original intention and early drafts of its plan related to the period to 2035. We also developed our plan to cover the period until 2035 specifically to accord with the Borough Council's original and long-held intention. However, we accept that to comply with the local plan, the new dwellings allocated to Bromham will need to be in place by 2030 and it is with some reluctance that we agree that the plan should now cover the shorter period – to 2030.

A.1.4 The Plan is divided into four main sections: Part A – which is this introductory section; Part B, which deals with the planning policies against which planning applications will need to be assessed; Part C, covering community issues and aspirations for the future; and Part D covering the implementation and monitoring of the plan.

A.2 - BROMHAM NEIGHBOURHOOD AREA BOUNDARY

A.2.1 The civil parish of Bromham - see Map 1 - was formally designated a neighbourhood area under the Town and Country Planning Act 1990 by Bedford Borough Council on 18 August 2014.

Map 1 – Bromham Civil Parish



A.3 - HOW THE PLAN FITS WITH THE WIDER PLANNING SYSTEM

A.3.1 Although the Localism Act 2011 intends that local people have more say in decision-making relating to their area, there are other important requirements to which neighbourhood plans must adhere. At the national level, neighbourhood plans must take account of the National Planning Policy Framework (NPPF) and planning law. At the local level, the Plan must conform with Bedford Borough's current strategic priorities (See Para A.1.3 above) and ultimately with Bedford Borough Local Plan 2030, and together with the Local Plan will form part of the development plan for Bedford Borough when they are made and adopted.

A.3.2. The emerging Bedford Borough Local Plan 2030 has identified Bromham as a key growth village which should accommodate a further 500 dwellings to reflect the village's current status as a Rural Key Service Centre (which means that it currently has a range of shops, a garage, library, GP surgeries and other facilities). Other Rural Key Service Centres, such as Clapham, Great Barford and Sharnbrook have also been required to accommodate circa. 500 new dwellings. Under the Localism Act 2011, a neighbourhood plan may allocate more land than is required to accommodate the number of dwellings specified in the local plan for the neighbourhood area, but it may not allocate less land than is required.

A.3.3. The consultation process undertaken during the development of the Plan has given residents the opportunity to have a say about, amongst other things, where new housing should be located within the village. In the absence of such a plan, Bedford Borough Council would make that decision.

A.4 – CONSULTATION

A.4.1. Our Community Engagement Strategy, published in November 2014, is at Supporting Document 1 and is also available on Bromham Parish Council's website:
<https://bromham.bedsparishes.gov.uk/a/8070292-8070325>

A.4.2. Our vision and aims for the Plan derive wholly from residents' views as expressed through our consultation events and exercises. Bromham Parish Council launched its neighbourhood planning exercise on 20/21 February 2015 at a public event at Bromham Village Hall. The event was used to suggest, and invite residents' comments on, potential themes for the plan. These included housing, the environment, getting around the village, schooling and young people, village facilities and heritage sites. Over 350 people attended the event.

A.4.3. In July 2015, a village questionnaire (See Supporting Document 2) and a housing needs survey (See Supporting Document 3) were circulated to all residential and non-residential properties in Bromham. The questionnaire elicited 593 responses, which provided the steering group with a clearer understanding of residents' views. The housing needs survey was conducted on our behalf by Bedfordshire Rural Communities Charity and received 84 responses.

A.4.4. The questionnaire findings were exhibited at a public event at Bromham Village Hall in April 2016. At the same event, there was also a detailed explanation of the proposed redevelopment of the Old Stable Yard at Hall Farm. In the questionnaire document, we used the map of proposed sites provided by Bedford Borough Council, which showed the whole of Bromham Park Estate's landholding in Bromham rather than the limited area of land south of

Lower Farm Road where development was proposed. This led to the misapprehension by many residents that there was a proposal to build in what is locally known as 'Bromham Park' – or 'the Park'. The more detailed explanation provided at the April 2016 event was designed to give residents a clearer understanding of what was actually proposed.

A.4.5. The feedback we received at the event suggested that the explanation was successful in clarifying the location and extent of the proposed Old Stable Yard Development. However, we sought to test this view with the wider community by circulating the written material about Hall Farm used at the event with an 'Issues and Options' consultation (see below) and seeking views on it.

A.4.6. The next limb of consultation was an event to engage the local business community with the emerging Neighbourhood Plan. This was held in September 2016.

A.4.7. In late 2016 an Issues and Options Consultation (See Supporting Document 4) covering housing and education matters was circulated to all households. It elicited 484 responses and provided a clearer view about the preferred locations and types of future housing. The responses also suggested a clear preference that the school should remain centrally located within the village. Supporting Document 4 also contains the material circulated about extent of the Old Stable Yard at Hall Farm, which was circulated with the Issues and Options Consultation.

A.4.8. On 2 and 3 March 2018 a public event was held at Bromham Village Hall which set out our emerging findings and invited comments. Our aim was to ensure that we were still on the right track. Although there were substantial snowfalls on the days leading up to and during the event, 278 people attended.

A.4.9. During 2015, we also consulted the children at (then) Bromham Lower School, Lincroft Middle School and Sharnbrook Upper School, the main state schools attended by Bromham children.

A.4.10 The sequence and nature of our consultation exercises, and summaries and analyses of responses, is set out at Supporting Document 5 and is also available on Bromham Parish Council's website - <https://bromham.bedsparishes.gov.uk/a/10942793-11645147>

A.5 - VISION AND AIMS

A.5.1 The comments and suggestions received at the February 2015 launch event enabled us to generate the Plan's vision and aims as set out below:

Vision and Aims

Vision

Our vision is that Bromham should retain its identity and integrity as a rural village whose inhabitants enjoy its facilities safely, continue to have access to Bromham Park and its other green spaces, and derive value from Bromham Mill and other village facilities. Any new development in Bromham should be assimilated in a way that retains these characteristics while safeguarding the environment.

Aims

Our aims are -

1. Identity and Integrity

to ensure that the village retains its broad shape and distinctive character and remains separate from, albeit linked with, Bedford and the surrounding villages;

2. Safety

to ensure that the location and layout of any new development reflect the need to minimise the impact of the additional traffic generated, in terms of volume and speed, on the rural character and safety of the village;

3. Bromham Park and other Green Spaces

to enable inhabitants to enjoy continued access to Bromham Park and other green spaces and footpaths;

4. Bromham Mill

to enhance the value of Bromham Mill to the inhabitants of Bromham and other local people by increasing the number of events and activities it hosts and giving the site a more dynamic and central focus in village life.

A.5.2 This vision remains central to the Plan and the aims have been among our principal drivers.

A.6 - THE NEIGHBOURHOOD PLAN

A.6.1. The Plan's main objective is to allocate land for new housing, but it also covers village life more generally and looks at a range of issues that emerged in the consultation process as being likely to affect the future quality of life in Bromham.

These include -

- the type, tenure and style of new housing;
- transport and traffic issues – getting around safely both now and in a bigger, busier village in the future, with as much emphasis on pedestrians, cyclists and users of public transport as on vehicle users with a view to encouraging sustainability;
- ensuring there are adequate local services and facilities;
- the provision of sufficient schooling and facilities for young people;
- Retaining access to Bromham Park and preserving green spaces and ancient woodlands;
- the protection and regeneration of Bromham Mill; and
- ensuring that the environment of the village and its surroundings is protected and there are no negative likely significant effects relating to the Water Framework Directive or to European sites designated under European Directive 92/43/EEC by output from the River Great Ouse.

A.6.2. It is also important that the plan does not have a deleterious effect on the environment. Neighbourhood Plans may require a Strategic Environment Assessment (SEA), but only where there are potentially significant environmental effects. As the 'responsible body', the Parish Council completed an SEA screening report (see Supporting Document 6) recommending that an SEA was not required. This report was sent to Natural England, Historic England and the Environment Agency as the statutory consultation bodies. None of the bodies suggested that an SEA was required.

A.7 - ABOUT BROMHAM

A.7.1. Bromham is a large rural village, within a civil parish covering an area of 820 hectares, approximately four miles northwest of Bedford. It sits largely on high ground overlooking the Great Ouse Valley.

People

A.7.2. The latest population data come from the 2011 Census, which showed that Bromham had a population of 4,957, made up of 2,069 dwellings and 2,028 households. Home ownership, at 89%, was high compared with Bedford Borough's average of 67%: 4% of households rent from social landlords and 7% rent privately. Housing was predominantly detached (52%) or semi-detached (33%)

A.7.3. Around 39% of those employed were managers, directors or in professional occupations, which exceeded the average for Bedford Borough. Similarly, the proportion of adults with degree level qualifications - 37% - was also above the Borough average.

A.7.4. Multiple car ownership per household was much higher than for the Borough as a whole, with 41% having two cars and 14% with three cars or more. Only c. 9% of households had no car at all, compared with c. 20% across the Borough.

A.7.5. Most people travelled to work by car (78%) and c.13% commuted by train, bus, cycle or on foot. Approximately 8% of those who were employed worked from home.

A.7.6. Although these data are now over seven years old, there have not been changes in the village that would suggest the village's population characteristics have changed substantially.

Places

A.7.7. Bromham has a large number of heritage assets, including St Owen's Church, Bromham Hall, Bromham Mill, the Village Road site of the school, Bromham Bridge and a number of privately-owned listed buildings. In addition to the iconic green space of Bromham Park, the Green and Vicarage Green, the parish also has three fragments of ancient woodland - Salem Thrift, Molivers Wood and Bowels Wood - which form an important part of the pattern of green spaces that help to characterise the village. The Parish Council and Bromham Conservation Group work hard to protect these spaces, and the wildlife and flora they support, for future generations to enjoy.

A.7.8. There are two active church communities in the village: St Owen's Church located in Bromham Park and the Baptist Church on Village Road. The village currently also has a range of shops, public houses, a garage, library, and GP surgeries, giving it Rural Key Service Centre status within Bedford Borough. However, there are currently plans to relocate both GP surgeries in Biddenham, a proposal that Bromham Parish Council continues to oppose.

A.7.9. Bromham remains a popular village, with its close links to Bedford and Milton Keynes. It has easy access to a number of trunk roads and the motorway network, and also to London and elsewhere via the rail network from Bedford Railway Station.

A.8 - KEY ISSUES FOR THE FUTURE

A.8.1. As discussed in Section A.5, (page 5) the views expressed by residents at the launch event, and subsequently, were central to defining the vision and aims from which a number of key issues emerged.

Housing

A.8.2. Residents' principal concern was the adverse impact that substantial new housing would have on traffic flows through the centre of the village and the main through-roads. Given that relatively few residents work within the village, there was a strong desire for new housing to be located where it would have good access to the A428 (Bromham Bypass).

A.8.3. Residents also wanted new housing that would enable both older residents to 'downsize' to accommodation more suited to their current needs, and 'affordable' housing for young people from Bromham households who want to remain within the village.

Getting Around the Village

A.8.4. Speeding, inconsiderate parking, bus services, and greater safety for pedestrians and cyclists were identified as residents' current concerns in getting around the village. Residents were concerned that these issues would be exacerbated by the traffic generated by new development. Since the opening of the Great Ouse Way – the final segment of Bedford's By-Pass - the Parish Council has received many representations about additional traffic increasing the difficulty, and consequent danger, of entering or exiting Bromham at the four junctions with the A428. We have also borne this in mind in our discussions with developers.

Access to Bromham Park

A.8.5. It was clear from the launch event and questionnaire responses that residents place a very high value on access to what is known locally as Bromham Park, or simply 'the Park'. It is a beautiful area of traditional parkland, containing St Owen's Church, and is central to the identity of Bromham. Many people walk, or exercise dogs, in the Park, and its public footpaths help to link different parts of the village. The Park provides the wider setting for the Grade 1 listed St Owen's Church and - albeit much less visibly - Grade II* listed Bromham Hall.

A.8.6. However, it is important to remember that the Park is privately owned and forms one part of a larger agricultural enterprise owned by Bromham Park Estate. The family of the current owners of Bromham Park Estate bought the land that makes up the estate in three stages between the mid-1920s and mid-1930s. The final addition to the estate was what is known as 'the Park' and was purchased to prevent it being developed for housing. An agreement was made with the former Bedfordshire County Council that the Park – and only the Park - would not be developed for housing.

A.8.7. The current owners wish to retain the Park much as it is now, with wildlife conservation areas, and some agricultural use, but also maintaining continued public access via the network of existing footpaths.

A.8.8 At the northern boundary of the land owned by Bromham Park Estate (and to the immediate south of Lower Farm Road) is the Hall Farm site. This area is set away from 'the Park' and lies outside the agreement mentioned in para 8.7.6. Until recently, Hall Farm was used as a commercial livery but is now proposed by the owners as Old Stable Yard development. The land in question contains a farmhouse, stabling and other agricultural buildings, together with fields to the south and east and the site is considered suitable for helping to meet the housing requirement for Bromham, subject to the policies in Section B7.

The School

A.8.9. Bromham Primary School plays a major role within the village community. There was a suggestion during the early stage of the neighbourhood plan process that an additional school, or school site, might be needed elsewhere in the village. We share the view of the school governors and both the current and previous Head Teachers that it is important for Bromham's children – and for the cohesion of the village – that there should continue to be a single school within the village, preferably on the existing single campus. The school would then remain at the heart of our community.

Identity and Integrity

A.8.10. Residents were very clear in their desire to maintain the identity and integrity of Bromham. There was concern that although the village needed to maintain its strong links with the town of Bedford, it should not be subsumed within Bedford nor merged with surrounding villages. The river and the A428 provide some physical separation from Bedford, providing natural boundaries for the parish, but we have had in mind residents' concerns in considering some potential sites for new housing development.

Services and Facilities

A.8.11. The quality of local services is good for a village of Bromham's size but they will come under pressure with an increased population arising from the new development. Residents were concerned that services should keep pace with change in village size.

A.8.12. Bromham has some sporting, leisure and wellbeing facilities and services but there will be a need for more and better facilities to accommodate the increase in population successfully.

The Future of Bromham Mill

A.8.13. Like its neighbour Bromham Park, Bromham Mill does much to help characterise Bromham. It is a historic building in a beautiful setting and residents share our view that, together with its surrounding green space, it could be much more extensively used than is currently the case, and could help to create a dynamic community hub.

PART B – Planning Policies

B.1 – HOUSING – LOCATION

B.1.1. The requirement in the emerging Bedford Borough Local Plan 2030 that Bromham should accommodate 500 new homes in the period to 2030 is not negotiable. The issue to be resolved is where within the village the new homes should be located. In addressing this issue, we have taken account of residents' clearly expressed view that the location and layout of new development should be selected so as to minimise the impact of the associated additional traffic on the rural character of the village.

B.1.2. The questionnaire findings clearly supported this aim: those sites in the west of the village with easy access to the A428 (Bromham Bypass) attracted most support, whereas sites to the north and east of the village attracted more opposition. Because of the configuration of Bromham's roads, most of the traffic from the latter sites would inevitably be channelled along Village Road and at least one of the other main through-roads before exiting the village.

B.1.3. Although avoiding traffic blight is a major priority for residents, we have also taken account of both national and local planning policy. The National Planning Policy Framework, February 2019 version (NPPF) makes clear that encouraging the use of previously developed, or 'brownfield', sites, is one of the government's core land-use planning principles (NPPF 2019, Paras 117 and 118). Bedford Borough Council's existing strategic priorities and the emerging Local Plan 2030 also contain policies which seek to maximise the delivery of development through the reuse of suitably located previously-developed land. These were relevant considerations in the allocation of the Old Stable Yard Development at Hall Farm.

B.1.4. We used Bedford Borough Council's site selection methodology to assess each site put forward for development within the Bromham Neighbourhood Area – see Supporting Document 7. This required consideration to be given to each site's suitability, availability and deliverability for development, as well as any known physical, access or environmental constraints. We also took account of Bedford Borough Council's Highway, Access and Transport Surveys covering the sites - See Supporting Document 8. Because we also intended that Bromham residents should have a strong voice in the selection of sites, we included the findings of the village consultation exercises in the assessment as well as introducing other local knowledge, such as the existence of ancient woodland near proposed sites. The assessment process identified more sites that were 'suitable' for development in planning terms than were needed to meet the requirement to accommodate 500 dwellings. The questionnaire findings were used to provide an additional filter to enable us to allocate only sufficient land to meet the requirement. A summary of the site assessments is at Supporting Document 9 and is also available on Bromham Parish Council's website <https://bromham.bedsparishes.gov.uk/a/8070292-13393594>.

B.1.5. Taking these factors into account, our main policy objectives and policies for locating new housing are set about below.

Policy Objectives relating to the Location of New Housing

1. To allocate sufficient sites to accommodate the 500 new homes required by Bedford Borough Local Plan 2030.
2. To ensure that, where possible, development sites are located close to the A428 (Bromham Bypass) to facilitate good access to it and so avoid unnecessary journeys on village through-roads.
3. To allocate brownfield sites, provided there are no countervailing planning, sustainability or highways issues.
4. To ensure that development sites are properly integrated into Bromham, by providing good connections for pedestrians and cyclists as well as motorists.
5. To ensure that development on allocated sites ensures that there are no impacts on designated wildlife sites and takes account of potential negative significant impacts relating to the Water Framework Directive or to European designated sites downstream on the River Great Ouse

Housing Allocations Policies

HA1. – ~~Provided that the development sites meet the requirements set out in other parts of this plan, and of Bedford Borough Council’s strategic priorities at the time of any planning application, the three sites set out below and shown in Map 2 should be allocated for development. The sites set out below and shown on Map 2 are allocated for residential development. Any proposal for the development of an allocated site must meet the requirements of the relevant Policies of the Bedford Borough Council development plan before planning permission will be granted.~~

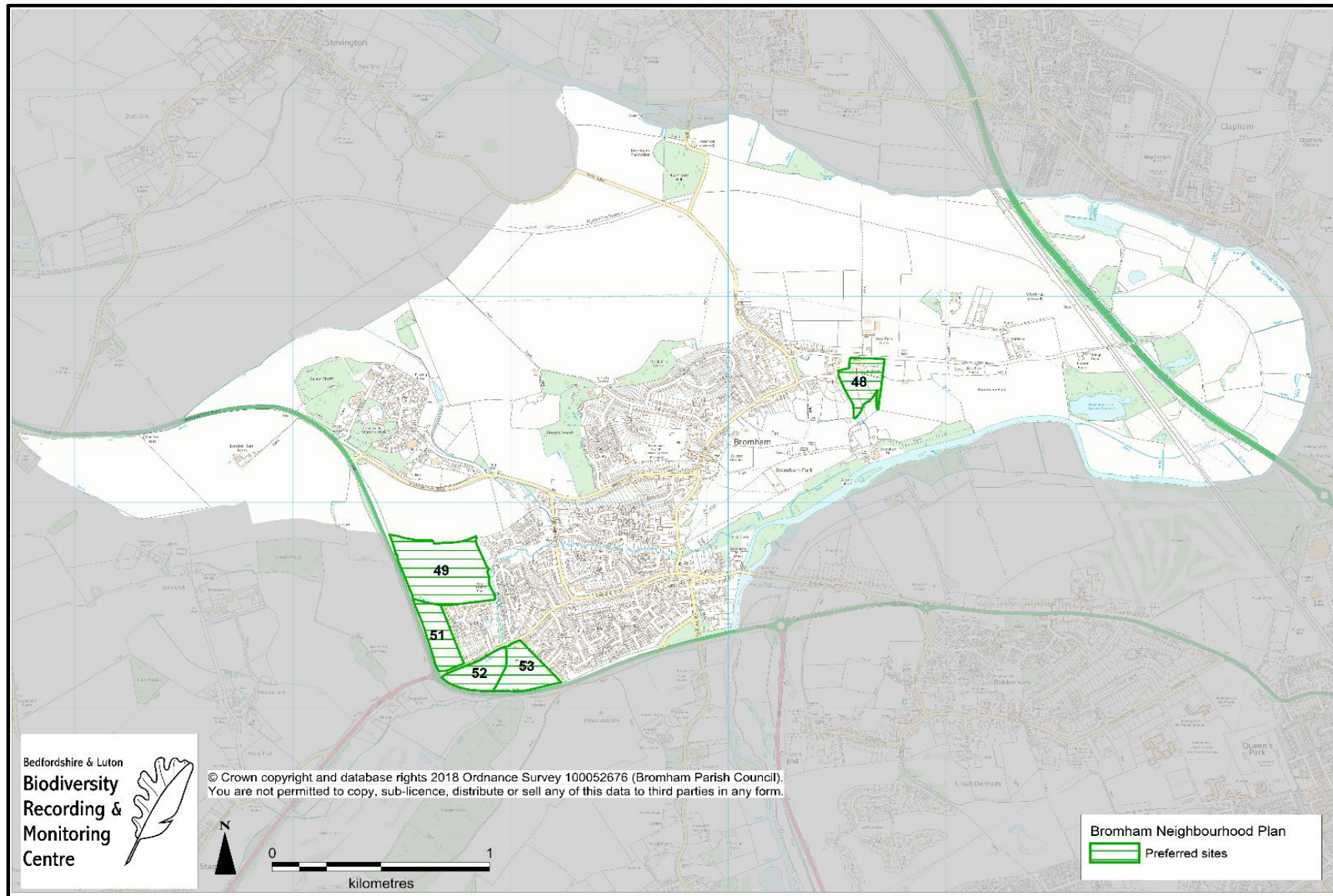
| Site | Housing units |
|------------------------------------------------------------|------------------|
| Beauchamp Park - Sites 49, 51 and 52* | a minimum of 390 |
| The Stagsden Rise Development - Site 53* | a minimum of 80 |
| Old Stable Yard Development at Hall Farm - Site 48* | A maximum of 30 |
| TOTAL ALLOCATION | 500 |

*Site numbers from Bedford Borough Council’s 2014 Call for Sites

HA2. ~~Developers of sites allocated for residential development in this plan should provide appropriate financial contributions towards improving local infrastructure as agreed with Bedford Borough Council and other relevant bodies through the planning application process.~~

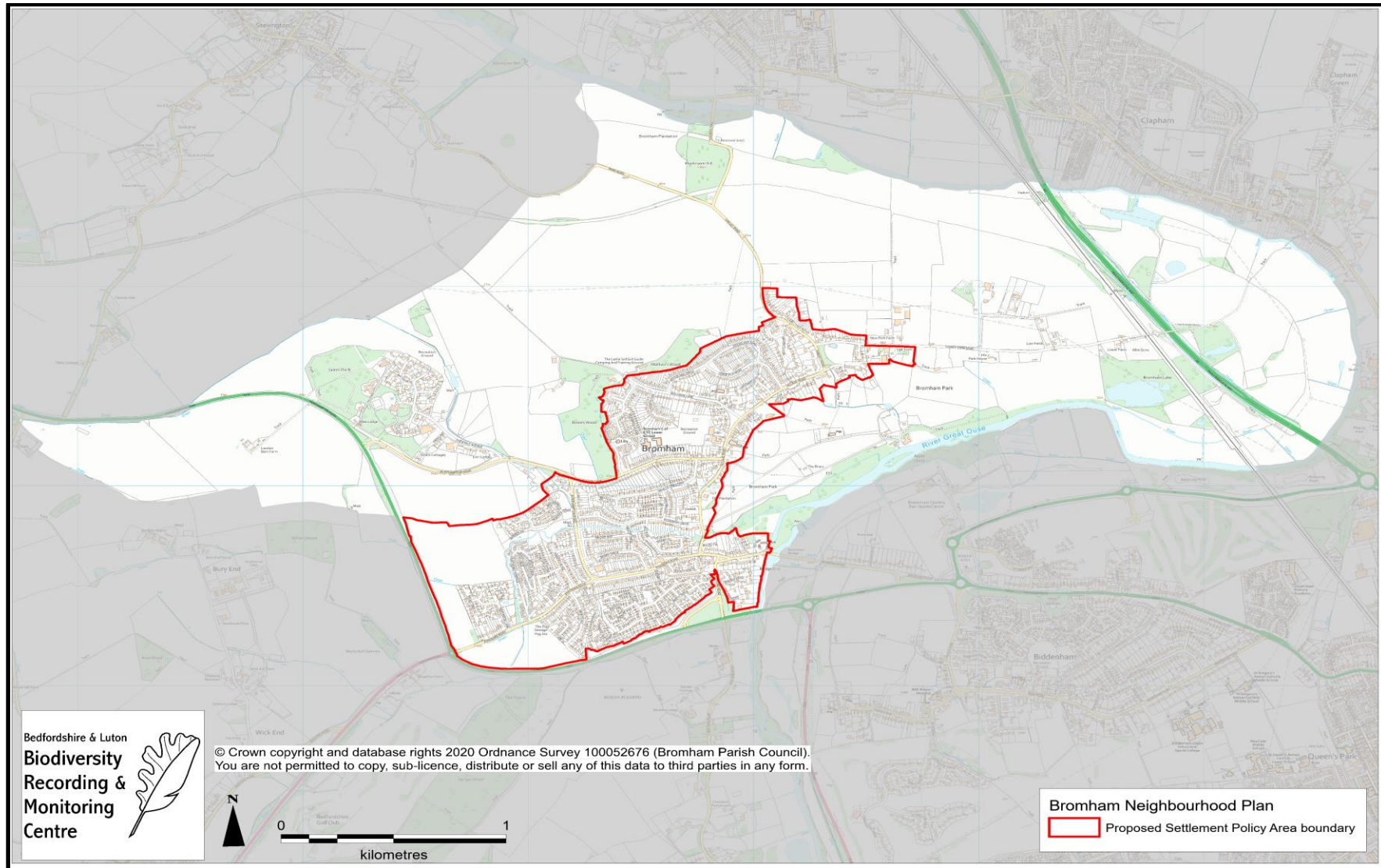
In respect of on-site infrastructure, applicants should provide a Phasing Plan to indicate delivery timescales at an appropriate stage in the planning process or as part of the Section 106 agreement.

Map 2 – Locations of the Allocated Sites



B.1.6. These allocations would create the Settlement Policy Area for Bromham Neighbourhood Area as set out in Map 3 below:

Map 3 – Settlement Policy Area for Bromham Neighbourhood Area



B.1.6. Beauchamp Park is an amalgamation of three sites put forward in 2014 that attracted strong support from residents, and clearly meets the objective of having immediate access to the A428 Bromham Bypass. Bedford Borough Council's highways and transport access assessments for each of Beauchamp Park's three constituent sites recommended that they should be taken forward for further assessment.

B.1.7. The Stagsden Rise Development is also well placed for access to the A428 Bromham Bypass and was also recommended for further assessment by Bedford Borough Council's Highways Team. Although both of these developments are well placed for access to Bromham Bypass, their interfaces with Stagsden Road, and the already busy and challenging traffic island at the junction of Stagsden Road and the A428 Bromham Bypass will need to be carefully engineered to enable traffic to get in and out of the village safely, quickly and smoothly.

B.1.8. The Old Stable Yard Development is different from the other two developments in that, although it would generate some additional traffic through the village, it is a partially brownfield site. Until 2016, the site had been used as a livery stable providing facilities for 20-30 horses: accordingly, we believe its development would comply with the requirements of the National Planning Policy Framework and Bedford Borough Council's strategic priorities relating to maximising the use of previously-developed land. We also believe that the increase in traffic would be kept within reasonable bounds by placing an upper limit of 30 new homes on the site. The owners would also create a cycle and pedestrian path from the development into the village centre through Bromham Park Estate land. This would provide a safe, sustainable link to the village facilities for residents of, and visitors to, the development.

HA3. To ensure that there is proper integration with the existing village, proposals for new housing must ensure that there are safe, sustainable transport connections, both within the development site and with the remainder of the village and should give primacy to pedestrians, cyclists and, where appropriate, bus users.

Sustainable connections can be achieved by providing -

- short, direct pedestrian and cycling routes both within each development site, where appropriate, and to other parts of the village;
- good access to existing public transport. The Stagsden Rise Development is close to the existing bus route, and the aim will be to negotiate an additional stop within Beauchamp Park to the existing bus service, subject to discussions with local bus operators and service patterns at the time the development comes forward; and
- good interfaces between roads and pavements on the new developments and the village's existing road and pavement system.

B.1.9. Further information about transport connections is set out in Section C.1 on Getting Around.

B.1.10. Developments will also need appropriate infrastructure for connections to existing utilities and services.

B.2 - AFFORDABLE HOUSING

B.2.1. During our consultations, we sought residents' views about local needs for new housing, and the types of housing that would best meet these needs. Housing to enable young people to remain within the village, and to enable older residents to move to accommodation more suited to their current needs, featured strongly in responses. Starter, affordable and family homes, as well as retirement housing, received substantial support.

B.2.2. Bedford Borough's existing strategic priorities and the emerging Local Plan 2030 set out the requirement for affordable housing on individual sites. The emerging Local Plan 2030 requires that, subject to viability, at least 30% of the housing units in any new development site should be affordable housing, and that 78% of the affordable housing should be social or affordable rented properties, and the remaining properties should be intermediate tenures, such as shared ownership. The National Planning Policy Framework 2019 (NPPF 2019) defines affordable housing as 'housing for sale or rent, for those whose needs are not met by the market...'. (See NPPF 2019 - glossary.)

B.2.3. To establish genuine need, but to guarantee anonymity for the households that responded, we asked Bedfordshire Rural Communities Charity (BRCC) to undertake a Housing Needs Survey on our behalf. The survey was designed to establish genuine housing need for households with a Bromham connection. It looked at the nature of respondents' connections with Bromham, their household composition, when they would need housing, the nature of their current housing, their preferred housing type, income and savings. There were 84 responses to the survey.

B.2.4. BRCC's report on the survey is at Supporting Document 10 and is also available on Bromham Parish Council's website <https://bromham.bedsparishes.gov.uk/a/8070292-11476917>. Its main recommendations were:

- (1) that 11 housing units built under a rural exception policy would meet 50% of the self-assessed need over the period 2015 -2020; and
- (2) up to 25 housing units available on the open market would meet a reasonable proportion of the need for two and three bedroomed bungalows and retirement properties built to 'Lifetime Homes' criteria, and 2 and three bedroomed family homes for existing owner occupier residents wishing to stay in the parish.

B.2.5. Rural Exception Schemes cover the building of units of affordable housing that remain in perpetuity for the use of the local community. However, subsequent changes mean that Rural Exception Sites are contrary to Bedford Borough Council's housing policy.

B.2.6. Although we are disappointed by this outcome, we believe that the requirement for each of the allocated development sites to contain 30% of affordable housing in both Bedford Borough Council's existing strategic priorities and its emerging Local Plan will help people with a Bromham connection secure housing within the village.

B.2.7. We also accepted the BRCC recommendation about retirement and family homes and received residents' support for it. The distribution of housing units that meet this objective are set out in the policies specific to individual sites.

B.2.8. The housing units recommended in the BRCC survey report will be included in the minimum of 30% of new affordable housing units that must feature in all of the new development sites to accord with Bedford Borough Council's strategic priorities for dealing with affordable housing.

Policy Objectives relating to Affordable Housing

To secure the required proportion of affordable housing required by Bedford Borough Council policies in force at the time in each of the allocated development sites through a mix of sizes and tenures.

Policies relating to Affordable Housing

~~**AH1.** To meet identified needs within the community, each new allocated housing development site will be required to provide, subject to viability, at least the proportion of high-quality affordable housing required by the relevant Bedford Borough Council policies in force at the time. Affordable homes should be provided as an integral part of developments and their design should be tenure blind.~~

AH2. Subject to the planning and place-making objectives current when planning applications are made, the 25 units of two- and three-bedroom bungalows, retirement homes and family houses to be built to Lifetime Homes criteria as recommended in BRCC's report in the Housing Needs Survey (Supporting Document 10) ~~should~~ **shall** be distributed proportionately among the new development sites. Each allocated site must, in any event, comply with the requirements of the Bedford Borough strategic policy relating to housing mix that are most relevant to the proposed number of housing units on the site.

B.3 - SUSTAINABLE DEVELOPMENT

B.3.1. The National Planning Policy Framework requires that there should be a presumption in favour of new development that is sustainable in the sense of meeting the needs of the present, without compromising the ability of future generations to meet their needs (See NPPF 2019 paras 7-11). The policy focus is on the economic, social and environmental needs of the local community.

B.3.2. This policy area assumes that all efforts will be made to reduce dependency on high carbon fuels and so lead to an expectation of greater use of economic renewable energy systems and fewer car journeys, facilitated by improved pedestrian and cycling routes which make good connections with village facilities.

B.3.3. The policies in the documents containing Bedford Borough Council's existing strategic priorities and the emerging Bedford Borough Local Plan 2030 relating to Healthy Communities and Energy Efficiency set out the local requirement for complying with the NPPF presumption. We would expect all new developments in Bromham to comply with the Local Plan policies. As all three developments proposed in this plan would comprise more than 10 dwellings, each will be required to achieve a 19% reduction in carbon emissions below the relevant Building Regulation requirement.

B.3.4. Each of the developments will need to take account of legislation relating to water, habitats and species as set out in the relevant policies in the Place Making chapter of the emerging Bedford Borough Local Plan 2030.

B.4 - SITE SPECIFIC POLICIES

B.4.1. This section sets out the policies to be adopted in relation to each of the allocated development sites.

B.4.2. All of the developments will be expected to comply with the requirements of the Place Making section of the emerging Bedford Borough Local Plan 2030. The particular policies relate to place-making, design quality and principles, design impacts, access impacts, disturbance and pollution impacts and infrastructure impacts.

B.4.3. The Parish Council has established a small working group to liaise with the individual developers to be clear about requirements for the detailed design proposal, including transport and sustainability, access, new facilities and green spaces, water, and habitat and species regulation. The intention is that these design proposals will be agreed between the Parish Council and the developers prior to an application for outline or full planning permission being made.

B.4.4. Developers of sites neighbouring watercourses or where surface water could enter the River Great Ouse will also be required to undertake a Habitat Regulations Assessment to ensure that the appropriate level of sustainable drainage systems are constructed to prevent pollution.

B.5 – BEAUCHAMP PARK

B.5.1. This site comprises 19.17 hectares of land immediately east of the A428 Bromham Bypass and to the north and south of Stagsden Road. See Map 4. The eastern boundary of the site borders the Meadowfield development - built by the same developers and completed in 2006 - and the Partridge Lane development. The site is suitable for 390 residential units together with recreational and community facilities, and some informal green space.

Map 4 – Location of Beauchamp Park



Site Context

B.5.2. In response to Bedford Borough Council's Call for Sites 2014, Beauchamp Park was presented as three sites – Sites 49, 51 and 52. Sites 51 and 52 have common ownership but Site 49 is separately owned, albeit the developers act for both owners. All of the land is currently in use for agricultural purposes.

B.5.3. The southern-most site contains cropmarks suggesting the former presence of part of an Iron Age/Roman-British Rectilinear Enclosure. This is not a designated heritage asset (i.e. Scheduled Monument) and as such is not protected under the Ancient Monuments Act 1979. However, it is a non-designated heritage asset and so is covered under both national and local policy as a consideration in planning terms. The developers' discussions with Bedford Borough suggest that the presence of the archaeological remains would not prevent development of the site, subject to an appropriate scheme of mitigation being agreed.

B.5.4. In the village questionnaire findings, Sites 43, 49, 51 and 52 all attracted substantial support. Site 43 is immediately north of Site 49. Sites 43, 49 and 51, taken together, could have accommodated all 500 dwellings, with Site 52 as a reserve site. However, there were other factors to take into account, such as Hall Farm Old Stable Yard Development's partially brownfield nature. There was also, at that point, concern in the Highway and Transport Access Survey of 2016 and 2017 that access from site 43 onto the Northampton Road was less than optimal, and of more concern was the reference to 'Significant traffic impacts on [the] village, especially at Northampton Road/Grange Lane and Northampton Road/A428 junctions if [there were] no access onto Stagsden Road...' See the entry for Site 43 in Supporting Document 8. Although traffic from site 43 could be directed through sites 49 and 51 to join Stagsden Road, it could create considerable traffic flows at peak hours within Beauchamp Park itself. By combining Sites 49, 51 and 52 as the main site, 390 dwellings could be accommodated, leaving Site 43 in agricultural use. We believe that to be a more efficient and effective proposal.

B.5.5. The Beauchamp Park site is located on the south-western edge of the village with potential for a highways connection to the Stagsden Road for easy access to Bromham Bypass as well as to the village. There could also be some limited access to and from the village through the Meadowfield Development, particularly for pedestrians and cyclists. Accordingly, we believe the site could provide safe walking and cycling routes to the school and other village facilities and so promote more sustainable lifestyles, as should the fact that the village's only remaining bus service passes along Stagsden Road, between sites 51 and 52. The proximity of the site to Bromham Bypass would assist in meeting residents' aim of minimising traffic impact through the village.

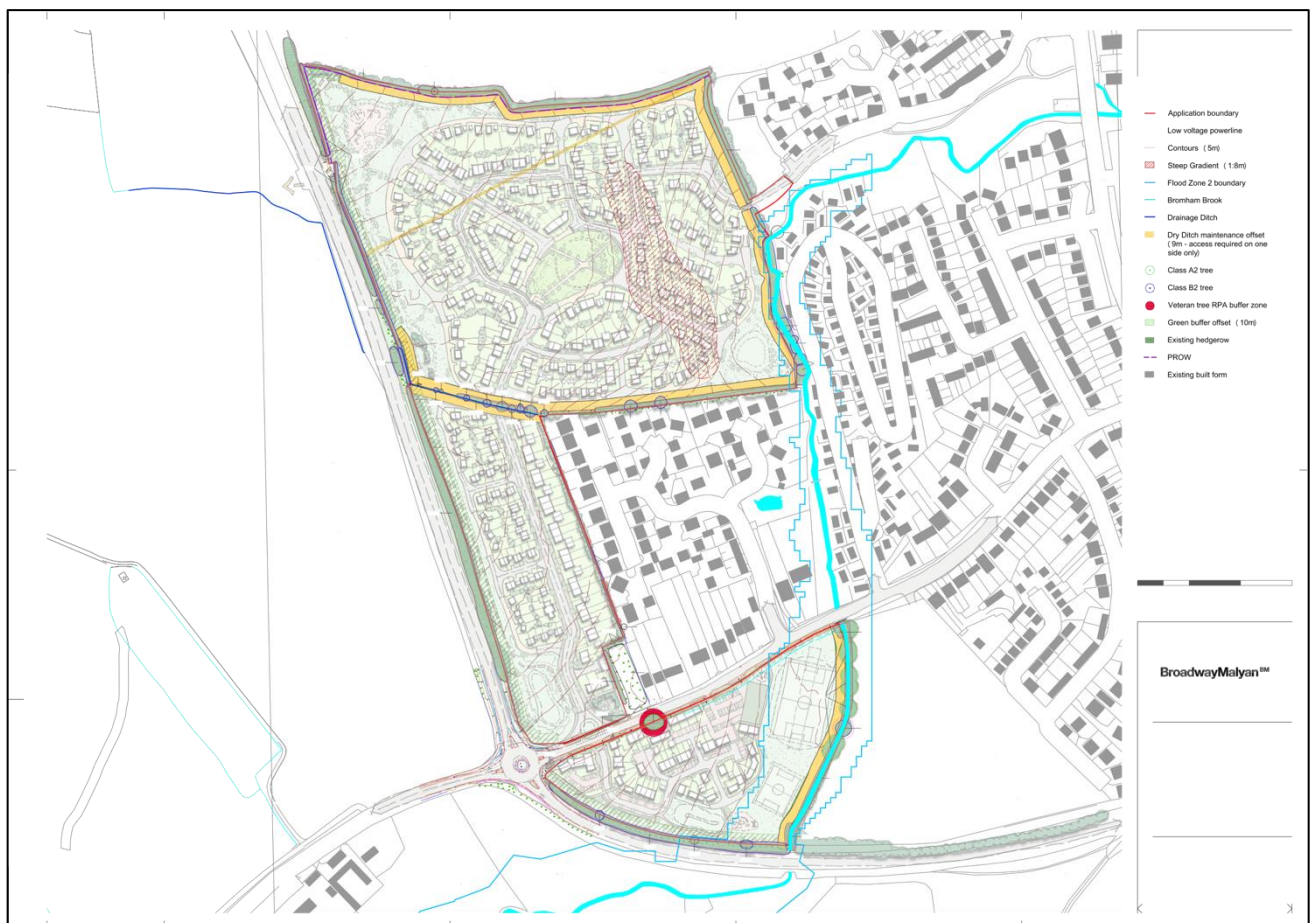
B.5.6. Some highways improvements and safety measures, including safe crossing points for pedestrians and cyclists, will be necessary to realise and emphasise the good access to the Bypass and to create sustainable, safe connectivity with the remainder of the village.

B.5.7. The site is large enough to incorporate some green space, which could accommodate a Village Oval containing some sports pitches and straight running track, together with outdoor tennis and netball/basketball courts within a Multi-Use Games Area for community recreational use, as well as more informal green space.

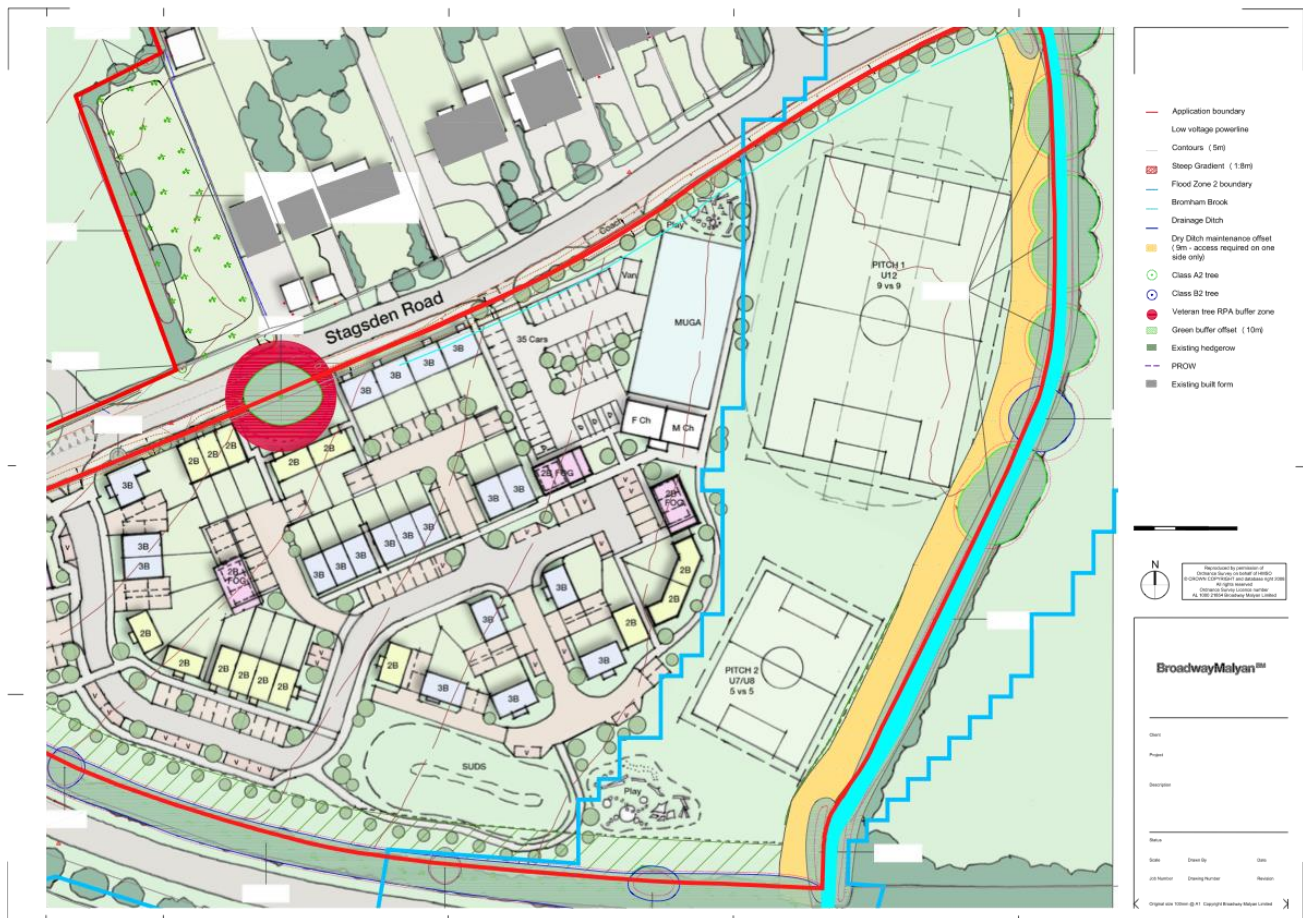
B.5.8. As the site abuts the A428 Bromham Bypass, some native tree planting along the western border would provide a buffer to traffic noise from the Bypass as well as providing wildlife habitats and space for recreational walking. We would in any event expect the sites to meet the requirements of the development plan policies relating to the protection and enhancement of existing key landscape features, and the provision of new landscaping where appropriate.

B.5.9. There are some undulations in the site and Bromham Brook borders its eastern margin for a short length. However, the different levels of the land would present no obstacles to building, although Bromham Brook will require protection in relation to surface run-off. The site contains a small area of land in Flood Zone 2 in the eastern section of Site 49, and a larger area in Flood Zones 2 and 3 in Site 52. We considered this both in the site assessment process (see Supporting Document 9) and the flood-risk sequential test (Supporting Document 11). Only water-compatible development – open space, and an outdoor sports and recreation area - is planned for the for land outside Flood Zone 1. A plan showing the indicative development area on the site is at Map 5 below. Given that the more extensive area of land outside of Flood Zone 1 is in Site 52, a larger scale plan of that site is at Map 6.

Map 5 – Beauchamp Park - Indicative Development Area



Map 6 – Site 52 - Indicative Plan of Development



B.5.10. The adjacent Meadowfield Development was completed in 2002/2003 and purchasers of dwellings there were informed that the developers had an option to build on the land covered by the central and northern parts of this site.

B.5.11. Taken together, Beauchamp Park and the Meadowfield Development, could generate sufficient demand to support a retail unit. There would also need to be sufficient commercial demand to provide such a service. Subject to that commercial demand existing, we would encourage the provision of a shop as part of the Beauchamp Park development. Such a shop could increase, and concentrate, parking in its vicinity and, in the event of a retail unit being agreed as part of the site, we would expect the developers to take that, and the impact on neighbours' amenity into account in the site design.

B.5.12. Beauchamp Park will provide by far the largest share of additional traffic. Easy access to and from the site will depend on ease of access from Stagsden Road to the A428 via the traffic island at the junction of Stagsden Road and the A428 Bromham Bypass. That traffic island is already challenging for motorists seeking to exit Stagsden Road. Sightlines from the junction to the north are poor: it is difficult to see traffic approaching from the north, which creates avoidable danger. We believe those sightlines should be improved as part of the Beauchamp Park development and that the developers should work with the Highway Authority to secure such improvements. Accordingly, we believe that improvements to the Stagsden Road/A428 traffic island should be a condition of planning permission.

BP - Beauchamp Park – Development and Requirements Policy

BP.1. Beauchamp Park amounting to 19.17ha is allocated to the development of a minimum of 390 residential dwellings and associated public open and recreational space within the site. **Provision for the requirements listed within this Policy shall be included within a planning application for the development of the site. A Section 106 Agreement which includes the timescale for implementation of the provisions shall be concluded prior to the grant of any planning permission.**

BP2. Of the affordable housing units to be built within this site there shall be at least five 1- or 2-bedroom bungalows, and fourteen 2- or 3-bedroom houses ~~that would~~ **required to** meet the development's share of BRCC's recommendation relating to retirement properties and starter homes. The development ~~should~~ **shall** also comply with the requirements for a site comprising this number of dwellings in the Bedford Borough policy relating to housing mix in force at the time.

BP3. No dwellings on this development ~~should~~ **shall** extend more than two stories from ground level.

BP4. The sports and recreation element ~~should~~ **shall** contain the Village Oval with dedicated space for cricket and shared space for rugby, two junior football pitches and an athletics track, together with Multi-Use Games Area (MUGA) with tennis/netball/basketball courts ~~should to~~ be included in this development. There ~~should~~ **shall** be changing facilities and adequate parking space to serve these facilities. The land and facilities ~~would~~ **are to** be owned and managed by the Parish Council, or ~~would~~ **will** be managed on the Parish Council's behalf.

BP5. In addition to open spaces for recreational purposes, there ~~should~~ **shall** also be some green spaces for wildlife – ~~this could~~ **to** be combined in part with native tree planting on the western border of the site, which would also act as a sound buffer to mitigate noise from Bromham Bypass.

BP6. The site must comply with development plan requirements relating to flood risk and sustainable drainage systems. Natural England and the Environment Agency must be satisfied that sites designated under European Directive 92/43/EEC will not be adversely affected.

~~BP7. Should commercial demand be found to exist, the provision of a shop unit as part of the Beauchamp Park development be encouraged.~~ **An assessment of commercial demand for a retail unit to serve the new neighbourhood shall be submitted to the local planning authority as part of the application for detailed planning permission of the development. The new unit to be located within Beauchamp Park with t**~~The potential impact on parking, traffic movements, site layout and residential amenity would also need to be considered in the siting of such a unit.~~

BP8. Sightlines to the north from the junction at the Stagsden Road/A428 traffic island ~~should~~ **shall** be improved as part of this development **in accordance with the requirements of the Highway Authority.**

BP9. Planning permission for the site ~~should~~ **shall** be subject to a planning condition requiring a programme of archaeological work. The archaeological work will include evaluation and

mitigation stages to be undertaken in accordance with advice obtained from Bedford Borough Council Historic Environment Team.

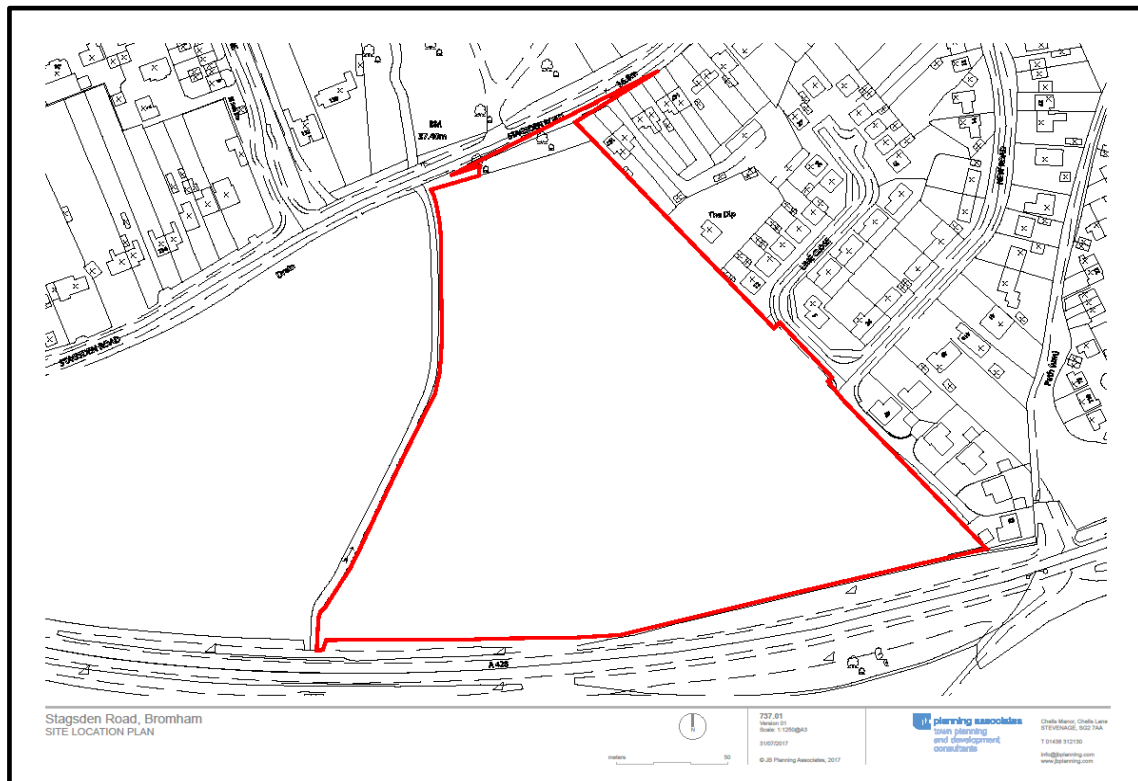
BP10. The following design principles ~~should~~ **shall** be reflected in proposals for this site –

- The overall approach to built form, street layout and landscape and dwelling density ~~should~~ **shall** aim to minimise the visual impact of the development and integrate it sensitively with the surrounding area.
- The developers ~~should~~ **shall** incorporate effective renewable and low-energy solutions within the new development to help offset additional carbon usage associated with the site.
- Appropriate highway interfaces, traffic-calming and pedestrian and cyclist safety measures ~~should~~ **shall** be provided to **discourage the passage of vehicular traffic through the scheme from Peacock Road and Barker Drive and to** further reduce the impact of the increased traffic associated with the development in accordance with the Highway Authority Design Guidance.
- **Subject to agreement with the Highway Authority measures to increase pedestrian and cyclist safety should include the provision of a safe pedestrian and cycle crossing of Stagsden Road between the northern and southern segments of Beauchamp Park to provide access to the Village Oval and other recreational facilities.**
- Garage size and off-street parking ~~should~~ **shall** comply with Highways Authority/Local Authority policies in relation to these matters that are current at the time of construction.
- **A new play area shall be provided to provide for a range of age groups together with** ~~An~~ **an** equipped playground ~~should~~ **to** be provided on the western side of the development. There are two playgrounds on the Meadowfield Development that could cater for some new residents on the eastern side of the new development.

B.6 – THE STAGSDEN RISE DEVELOPMENT

B.6.1. This site comprises 4.15ha of land between Stagsden Road, Lime Close and the A428 Bromham Bypass. See Map 7. Its western border is formed by Bromham Brook. It is suitable for 80 dwellings. The site was popular with questionnaire respondents. Planning consent for this site was granted in October 2019.

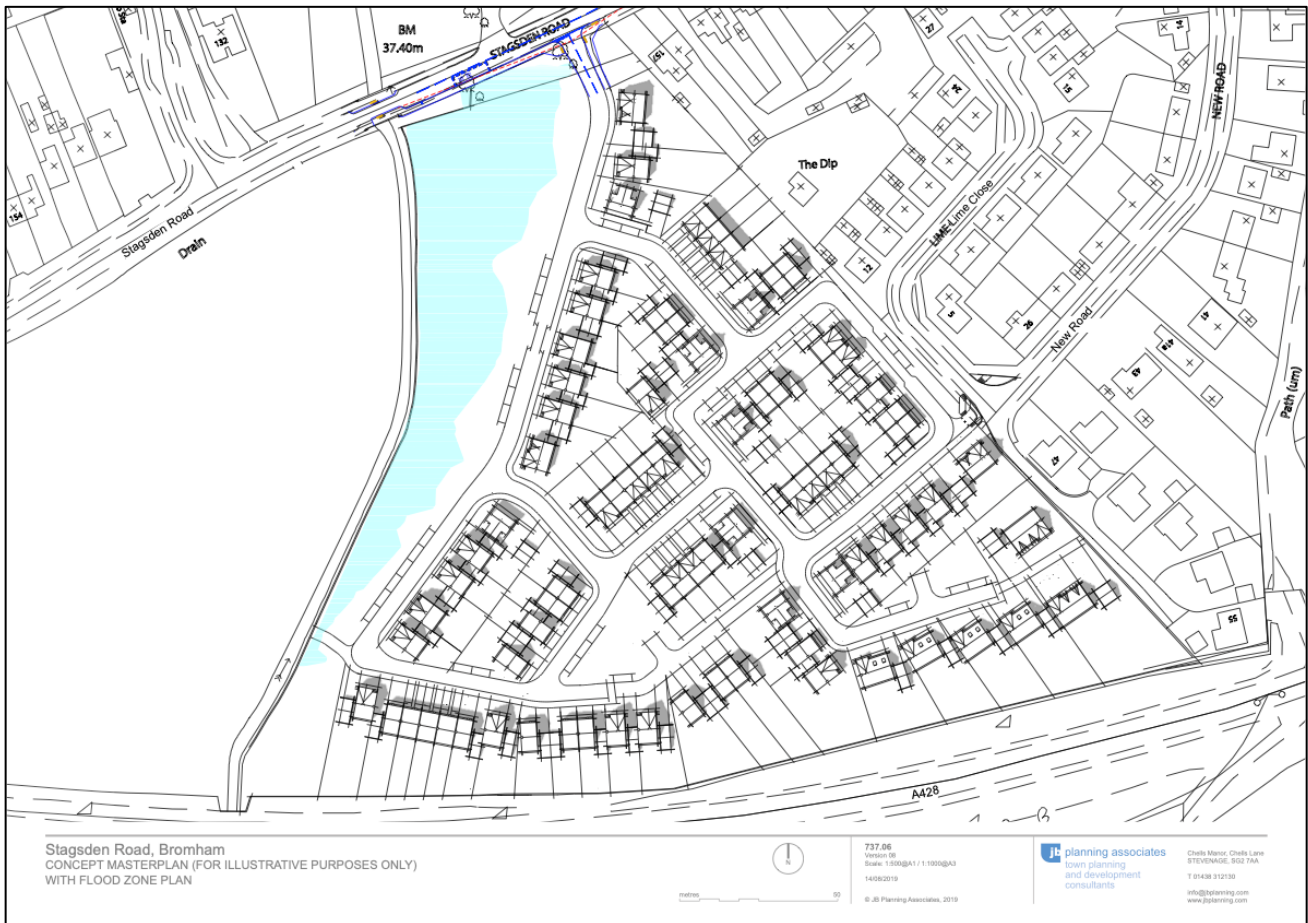
Map 7 – Location of Stagsden Rise



Site Context

B.6.2. This site is in single ownership and is currently used as agricultural land. The land rises sharply from Stagsden Road and Bromham Brook to where the site borders the A428 Bromham Bypass but should present no construction problems. The area around Bromham Brook is within the flood plain but should be designated as public open space thus providing a green edge to the western border of the development. We considered flood risk in relation to this site in both the site assessment process (see Supporting Document 9) and in the flood-risk sequential test (see Supporting Document 11). No development is planned in the areas of the site that fall outside Flood Zone 1 as shown in the indicative development area plan of the site at Map 8 below. We would also expect the developers to comply with local plan requirements relating to the protection and enhancement of existing key landscape features, and the provision of new landscaping, where appropriate.

Map 8 – Stagsden Rise – Indicative Development Area



B.6.3. This site also contains a site of historic interest in that Ordnance Survey maps from the 1880s and 1901 show quarry and lime kiln in the area, albeit much of the area of interest is now under housing to the east of the proposed development. The developers of the site have undertaken an archaeological survey of the site in accordance with a programme of works approved by Bedford Borough Council's archaeologists (See Supporting Document 12). No significant archaeology was revealed.

B.6.4. The site offers good pedestrian and cycling access to existing village facilities and lies immediately adjacent to the only remaining regular bus service: accordingly, we believe it will help to promote sustainable travel. Its location on Stagsden Road also offers good access to Bromham Bypass for those residents whose destination is not within Bromham itself.

B.6.5. We are concerned that every effort is made to minimise the traffic impact this development would have on residents in New Road and Lime Close. The developers themselves have proposed that there should be no regular direct vehicular access to the site from New Road or Lime Close, albeit there should be scope for access for emergency services vehicles. We also believe that development of the site should be possible without construction traffic using New Road and/or Lime Close.

SR - Stagsden Rise Development – Development and Requirements Policy

SR1. Stagsden Rise, amounting to 4.15 hectares of land, is allocated to the development of a minimum of 80 residential dwellings and public open space. **Provision for the requirements listed within this Policy shall be included within the planning application for the development of the site. A Section 106 Agreement which includes the timescale for implementation of the provisions shall be reached prior to the grant of any planning permission.**

SR2. Off the 30% affordable housing units to be built within this site, at least three 1- or 2-bedroom bungalows and two 2- or 3-bedroom houses ~~that would~~ **are required to** meet the development's share of BRCC recommendation relating to retirement properties and starter homes. The development ~~should~~ **shall** also comply with the requirements for a site comprising this number of dwellings in the Bedford Borough Council's policy relating to housing mix in force at the time.

SR3 No dwellings on this development ~~should~~ **shall** extend more than two stories from ground level.

SR4. New public green open space shall be created on the development in accordance with Policy AD28 of Bedford Borough Council's Allocations and Designations Local Plan. The green space ~~should~~ **shall** contain a play area **covering a range of age groups.**

SR5. The site must comply with development plan requirements relating to flood risk and sustainable drainage systems. Natural England and the Environment Agency must be satisfied that sites designated under European Directive 92/43/EEC will not be adversely affected.

SR6. Subject to agreement with the Highways Authority, a safe crossing point for pedestrians and cyclists ~~should~~ **shall** be provided across Stagsden Road to facilitate safe access to and from the existing bus stop on the north side of Stagsden Road

SR7. There ~~should~~ **shall** be no regular vehicular access to this development from New Road or Lime Close but there ~~should~~ **shall** be scope for access for emergency services vehicles.

SR8. Construction traffic associated with this site ~~should~~ **shall** be prohibited from New Road and Lime Close.

SR9. The following design principles ~~should~~ **shall** be reflected in proposals for this site –

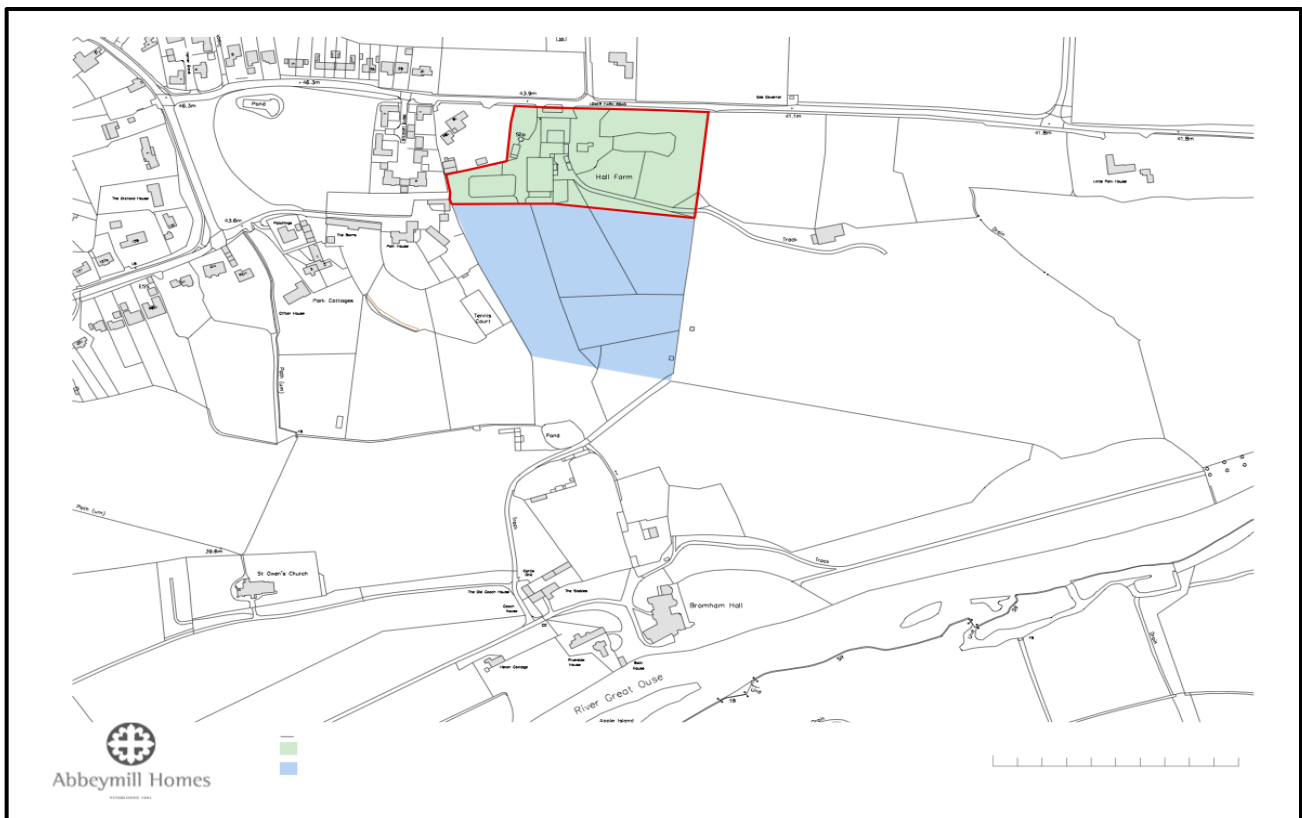
- The overall approach to built form, street layout and landscape and dwelling density ~~should~~ **shall** aim to minimise the visual impact of the development and integrate it sensitively with the surrounding area.
- The developers ~~should~~ **shall** incorporate effective renewable and low-energy solutions within the new development to help offset additional carbon usage associated with the site.
- Appropriate highway interfaces, traffic-calming and pedestrian and cyclist safety measures ~~should~~ **shall** be provided to further reduce the impact of the increased traffic associated with the development in accordance with the Highway Authority Design Guidance.

- Garage size and off-street parking ~~should~~ **shall** comply with Highways Authority/Local Authority policies in relation to these matters that are current at the time of construction.
- An equipped playground ~~should~~ **shall** be provided within the green space on the western edge of the development.

B.7 - DEVELOPMENT SITE 3 – OLD STABLE YARD DEVELOPMENT

B.7.1. This site comprises circa 1.6 hectares of land immediately south of Lower Farm Road (see the area in green in Map 9). Given concerns about additional traffic generated on village through-roads, and the nature of the junction between Lower Farm Road and Oakley Road, (while also taking into account the traffic previously generated by the commercial livery business) we have placed a maximum of 30 dwellings on this site.

Map 9 – Location of Old Stable Yard Development



Site Context

B.7.2. The allocation of this site and the desire of residents to have continued access to Bromham Park is dealt with in sections A.4, A.8.5-8 and in most detail at para B.1.8. The site, which is owned by Bromham Park Estate, currently accommodates a farmhouse, garden and paddocks and a range of other farm buildings including stabling and hard-standing. Until 2016, it was extensively used as a commercial livery stable with exercise areas to the south.

B.7.3. Encouraging the use of previously developed land is one of the core principles of the Government's planning policy, as set out in paragraph 117 of the National Planning Policy

Framework 2019. Bedford Borough's existing strategic priorities and the emerging Bedford Borough Local Plan 2030 also seek to maximise the delivery of development through the reuse of suitably located land that has been previously developed.

B.7.4. Allocating this site for development complies with this policy but we are keen to ensure that any development does not harm Bromham Park's status as an iconic green space. The site also needs to meet the same requirements of suitability, availability and deliverability as other sites. We believe it does.

B.7.5. The site is wholly within Flood Zone 1 and is mostly flat but with suitable landscaping should not impact substantially on the visual quality of Lower Farm Road. We would in any event expect the developers to comply with development plan policies relating to the protection and enhancement of existing key landscape features, and the provision of new landscaping where appropriate.

B.7.6. Although the site would generate some additional traffic through the centre of the village, the owners would also create a cycle and pedestrian path from the development into the village centre through Bromham Park Estate land. This would provide a safe link to the village facilities for residents of the development and so encourage sustainable travel.

B.7.7. The site is located in an important historic environment, including nearby designated and non-designated heritage assets. Consequently, Bromham Park Estate commissioned a Preliminary Setting Assessment, Archaeological Note and Landscape Note to assess the potential impact of the development on the local historic environment (See Supporting Document 13). The Preliminary Setting Assessment concludes that there is scope for housing development in this area which would not harm the setting or significance of any designated heritage assets and have minimal impact on the significance of Bromham Park as a non-designated heritage asset. The Archaeology Note concludes that non-intrusive investigations, and possibly trial trenching, would be required in the preparation of a future planning application, which would inform the layout and extent of the development. Finally, the landscape Note concludes that the site is considered to be visually well contained and there is no direct inter-visibility between Bromham Hall and the site, and that views from St Owen's Church and churchyard are restricted by the existing vegetation and topography of the intervening landscapes. We have considered these reports carefully and believe they provide an evidence base for the neighbourhood plan but would expect the owner/developer to work with Bedford Borough Council on any evaluation and mitigation plan considered necessary. The supporting document referred to above has been discussed with Bedford Borough Council and the Council's comments are reflected in Policy OS7 below.

OS - Old Stable Yard Development – Development and Requirements Policy

OS1. Old Stable Yard, at Hall Farm, amounting to 1.6 hectares of land, is allocated to the development of a maximum of 30 residential dwellings and public open space.

OS2. The development ~~should~~ **shall** also include at least three bungalows and three 2 or 3-bedroom houses ~~that would~~ **to** meet the development's share of the requirement for affordable housing, and BRCC's recommendation relating to retirement properties and starter homes in the sense of being affordable by average first-time buyers. The development ~~should~~ **shall** also comply with the requirements for a site comprising this number of dwellings in the Bedford Borough Council policy relating to housing mix.

OS3 No dwellings on this development ~~should~~ **shall** extend more than two stories from ground level.

OS4. A permissive pedestrian and cycle track for residents and visitors shall be constructed through Bromham Park Estate land to provide a sustainable and safe link between Old Stable Yard and village facilities. **A Section 106 Agreement shall be completed between the local planning authority and the landowner of Bromham Park Estate to provide for the design, provision and future maintenance of the pedestrian and cycle track prior to the grant of planning permission for the residential development of Old Stable Yard. The track shall be completed and open for use prior to the occupation of the first new dwelling.**

OS5. New public green open space shall be created on the development in accordance with Policy AD28 of Bedford Borough Council's Allocations and Designations Local Plan. **Provision of public green open space shall be included within the planning application for the development of the site. A Section 106 Agreement which includes the timescale for provision of the public green open space shall be reached prior to the grant of any planning permission.**

OS6. The site must comply with development plan requirements relating to flood risk and sustainable drainage systems. Natural England and the Environment Agency must be satisfied that sites designated under European Directive 92/43/EEC will not be adversely affected.

OS7. Given that the site is located in an area with high archaeological and built heritage interest the developer must work in conjunction with Bedford Borough Historic Environment Team to comply with the Bedford Borough Local Plan strategic policy relating to the historic environment and heritage assets and any relevant legislation. In particular, any planning application relating to this site ~~should~~ **shall** be accompanied by –

- > a detailed Heritage Statement describing the significance of nearby listed buildings, the contribution that 'setting' makes to their significance, the impact that the development would have on the listed buildings, and any measures proposed to mitigate the impact;
- > a detailed earthworks survey, together with the results of an archaeological evaluation, the scope of which ~~should~~ **shall** be agreed with Bedford Borough Council; and
- > further details of the 'ecological enhancement area' proposed immediately south of the site and whether it would involve works that would impact on earthworks and below-ground remains.

OS8. The following design principles ~~should~~ **shall** be reflected in proposals for this site –

- The overall approach to built form, street layout and landscape and dwelling density ~~should~~ **shall** aim to minimise the visual impact of the development and integrate it sensitively with the surrounding area.
- The developers ~~should~~ **shall** incorporate effective renewable and low energy solutions within the new development to help offset additional carbon usage associated with the site.

- Appropriate highway interfaces, traffic calming and pedestrian and cyclist safety measures ~~should~~ **shall** be provided to further reduce the impact of the increased traffic associated with the development in accordance with the Highway Authority Design Guidance.
- Garage size and off-street parking ~~should~~ **shall** comply with Highways Authority/Local Authority policies in relation to these matters that are current at the time of construction.

B.8 - PHASING OF DEVELOPMENT

B.8.1. Although neither Bedford Borough Council nor Bromham Parish Council can control when planning applications are made, the Parish Council is concerned that everything possible is done to minimise development-related disruption in the village, particularly in the south-west of the village where the majority of new development is proposed.

B.9 - INTEGRATING WINDFALL SITES

B.9.1. Windfall development, including ‘back-land’ development (where a number of dwellings are built behind existing dwellings) and tandem development (where one dwelling is built behind another in an existing single plot), is defined as residential development on land not originally allocated for development. We accept that there may be some applications for ‘windfall’ developments within the defined Settlement Policy Area (the area within the village within which development would be permissible) over the period of this plan in that small parcels of land with safe, direct access to the existing highways network may become available for development. We would expect such sites to contain only a small number of dwellings, but each case should be considered on its merits.

Policy Objective for Windfall Sites

To develop windfall sites within the Settlement Policy Area, where they provide efficient and effective use of available land.

Policies for Windfall Sites

HA4 Applications for windfall developments will be supported where they do not have a detrimental effect on the character of the area in which the site is situated and are within the Settlement Policy Area.

Windfall sites ~~should~~ **shall** have safe, direct access to the existing highway and not result in loss of amenity (as defined in planning guidelines current at the time of the application) to neighbouring properties.

Windfall developments will need to be integrated into the existing village in the same way as the allocated development sites, by having good, safe connections for pedestrians and cyclists, as well as motorists.

HA5 Any proposed windfall site must comply with development plan requirements relating to flood risk and sustainable drainage systems. Natural England and the Environment Agency must be satisfied that sites designated under European Directive 92/43/EEC will not be adversely affected.

B.10. - COMMUNITY INFRASTRUCTURE

B.10.1 Additional housing inevitably increases the demands on services and facilities as well as on public utilities, including broadband, and highways. It is essential that developers contribute financially or practically to the provision of these services to ensure that the new developments are sustainable. Both existing strategic priorities and the emerging Bedford Borough Plan 2030 set out parameters for the provision of this infrastructure. Developers will be required to contribute to Bedford Borough Council's Community Infrastructure Levy, which spreads the cost of funding the provision of local infrastructure such as educational and other social provision across a range of developers.

B.10.2. We also expect developers to make financial contributions to some more community-based assets. These are listed ~~throughout the plan but they are drawn together below so that the aggregate contribution is clear.~~ **within the site specific policies to ensure that they are incorporated within future planning applications for the allocated sites. They contribute to the achievement of the following objective.**

Policy Objectives for Community Infrastructure

Developers of the allocated sites should contribute to the enhancement and improvement of facilities and services within Bromham, both on their own developments and more generally within the village.

Policies relating to Community Infrastructure

~~CI 1 – Priorities for additional community facilities to help integrate the new development within the village are –~~

~~a) The sports and recreation element should contain the Village Oval with dedicated space for cricket and shared space for rugby, two junior football pitches and an athletics track, together with Multi-Use Games Area (MUGA) with tennis/netball/basketball courts should be included in the Beauchamp Park development. There should be changing facilities and adequate parking space to serve these facilities. The land and facilities would be owned and managed by the Parish Council, or would be managed on the Parish Council's behalf.~~

~~Surface run-off from new sports facilities must be directed to sustainable drainage systems so that Natural England and the Environment Agency are satisfied that sites designated under European Directive 92/43/EEC will not be adversely affected downstream on the River Great Ouse.~~

- ~~b) Subject to agreement with the Highways Authority, provision of a safe pedestrian and cycle crossing of Stagsden Road between the northern and southern segments the Beauchamp Park for safer access to the Village Oval and other recreational facilities.~~
- ~~c) A new play area in Beauchamp Park and Stagsden Rise covering a range of age groups.~~
- ~~d) Should commercial demand be found to exist, the provision of a shop unit as part of the Beauchamp Park development be encouraged. The potential impact on parking, traffic movements, site layout and residential amenity would also need to be considered in the siting of such a unit.~~
- ~~(e) The provision of a pedestrian/cycle track from the Old Stable Yard Development into the village through Bromham Park Estate land.~~

B.11 – EDUCATION PROVISION

B.11.1. Since beginning the neighbourhood planning process in 2014, we have been keenly aware of the central role that the school plays within the community. We and the school management team believe that the school should be at the heart of our community. Accordingly, we have had a continuing dialogue with the school governors and both the current and previous Head Teachers about the school and the future.

B.11.2. Bedford Borough Council's Education Department has also said that it prefers to support and expand successful, popular local schools when additional places are needed. Bromham Primary School certainly meets these criteria.

B.11.3. The school currently has two sites; the Grange Lane Site and the Village Road site, albeit they are located within what is effectively a single, traffic-free 'campus' either side of Bromham Playing Field, which is owned by Bromham Parish Council.

B.11.4. The addition of 500 houses will inevitably bring a substantial influx of school-age children to the village. We were also conscious that the school is in the process of changing its status from a Lower School to a Primary School, requiring two additional classrooms for each form of entry¹, as well as increasing from two to three forms of entry. This means that as well as extending the age-range of the children it teaches, by converting from Lower School to Primary School status, the school is also increasing the number of children it teaches by extending from a two-form entry to a three-form entry school.

B.11.5. Bedford Borough Council advised us in 2016 that an additional 500 homes in the village would require an additional form of entry, requiring seven additional classrooms for a Primary School.

B.11.6. In our Housing and Education Issues and Options Paper circulated in 2016 (Supporting Document 4), we consulted on the two options for the school that we believed would meet the requirement. The first was for Bromham Primary School to upgrade to a three-form-entry school, preferably on the existing campus. This required an additional 11 classrooms as described above.

¹ A single-form-entry school means there is one 'form' (of c.30 pupils) in each school year – a two-form entry school has two forms of c.30 children in each school year and a three-form-entry means there are three forms of c.30 children in each school year etc.

B.11.7. The other option was for a new two-form entry school to be built elsewhere in the village. This would require at least two hectares of greenfield land to be developed as a school site.

B.11.8. We supported the extension of the existing school, as being in the best interests of children – and the wider community - as did a large majority of respondents to the Issues and Options paper (See Supporting Document 5, Section 4, Q9).

B.11.9. To some extent, the pace of change has overtaken us. The Kingfisher Building - as the extension on the existing Primary School site in Grange Lane is known - was formally opened by Bedford Borough's Mayor, Dave Hodgson on 30 November 2017. This will enable the school's conversion to three-form entry primary school status

B.11.10. The Education Team at Bedford Borough Council have informed us that the Kingfisher Building is needed to accommodate the predicted increase in school-age children in the village and surrounding area, before the additional 500 houses come into consideration. Accordingly, a fourth form of entry will be required to accommodate the Primary-School-age children associated with the new development.

B.11.11. We, the school, and Bedford Borough Council's Education Department continue to believe that any new building work necessary to create a four-form entry school should be contained within the school's existing Grange Lane site. We are exploring with the Education Department whether the Kingfisher Building could be extended upwards to accommodate the additional classrooms rather than extending the footprint of the school. However, the increased number of children will require additional land to be available for sport and other recreational activities. If that proves to be the case the Parish Council would for an appropriate financial consideration be prepared to enter into a lease or similar agreement to allow the school to use some of the existing village playing field, while preserving a football pitch for use by local football clubs in another part of the playing field. The school already uses part of the village playing field for some sports activities.

B.11.12. The developers of Beauchamp Park will provide other football pitches suitable for use by local football clubs, as well as other recreational space within the 'Village Oval' planned for that development. In those circumstances, there would be an overall net gain in recreation space within the village, and local football clubs will not be disadvantaged by the proposals relating to the existing playing field. We would also aim to ensure that the current village playing field could continue to be used for Bromham Show, the village's major community event.

B.11.13 We recognise that the expansion of the school could exacerbate the current peak-time traffic problems in Grange Lane at school drop-off and pick-up times, but have set out in the policies below some potential mitigation measures. We also believe that the creation of safe pedestrian and cycling routes from each of the allocated sites to the village centre will also help to ameliorate the effect on Grange Lane.

B.11.14. In accordance with para 2B.4 of Bedford Borough Council's 'Planning Obligations, Supplementary Planning Document' the cost of this development would be met from Bedford Borough Council's Community Infrastructure Levy, to which the developers of all three areas of allocated land will contribute. We will also pursue with the developers whether they could contribute to traffic improvement and other improvement practical measures associated with the school project.

Policy Objective relating to Educational Provision

To retain a single school within the village based around the current Grange Lane/Village road 'campus'

Policies relating to Educational Provision

EP1 – The parish council supports the development of Bromham Primary School on the existing campus to ensure that there is sufficient classroom space and other facilities to accommodate the expected growth in pupils from the new developments. Any proposals to develop the school site should consider design, massing, scale, transport and residential and local amenity impacts. The council will maintain its current dialogue with Bedford Borough Council's Education Department and the governors and Head Teacher of the school throughout the period of the plan to facilitate these considerations.

EP2 – Subject to a fourth form of entry at the school being required to meet local need, the Parish Council will work with Bedford Borough Council's Education Department, School Governors and Head Teacher to facilitate meeting any requirement for the provision of additional playing-field capacity subject to an appropriate financial consideration.

EP3 - Further school facilities could exacerbate the peak-time traffic problems associated with the current school site, but careful site design, further initiatives to increase walking and cycling to school, improved traffic management around the site, and a primary focus on children from Bromham and Stagsden should be deployed so as to mitigate the increase in traffic to a substantial extent.

EP4 - More use could be made of the Village Hall area as a drop-off and pick-up point to relieve the pressure on the Grange Lane entrance to the school. The potential for widening the entrance to the Village Hall car park to help the flow of traffic in and out of that area should be explored. Another potential solution would be the installation of traffic lights at the junction of the Village Hall car park entrance road and Village Road which would operate solely at the peak school drop-off and pick-up times. The latter proposal might have a wider benefit by inhibiting speeding in Village Road at peak times. These options will be pursued with Bedford Borough Council.

PART C – Community Issues and Aspirations

Some of the issues covered by the Plan are not planning issues in the sense of relating specifically to new housing and the related infrastructure. These issues relate more to aspirations to improve the general quality of life and wellbeing within the village, such as how easy it is to get around the village, its services and facilities, including those for children and young people. As such, planning permission for the developments discussed in Part B is not contingent on the aspirations set out in this part (Part C) being met and need not be taken into account by Bedford Borough Council when determining planning applications.

C.1 - GETTING AROUND

C.1.1. As part of our consultation exercise, we asked residents to comment on getting around the village, both at present and in terms of any additional problems they expect to arise from the new development. The themes covered in the consultation were speeding, pedestrian and cyclist safety, inconsiderate parking and bus services.

Getting Around and the New Developments

C.1.2. The issues for getting around that relate solely to new housing development are dealt with in more detail in Section B.1 and focus on ensuring the locations of new development provide good access to Bromham Bypass and also secure improvements in walking and cycling infrastructure in the village, which should avoid exacerbating existing access and safety concerns as well as promoting sustainability.

C.1.3. We are working with the developers of the three allocated sites to secure safe routes to village facilities for pedestrians and cyclists so as to deliver the sustainability of their sites.

Getting Around at Present

C.1.4. In terms of current issues, responses to the Questionnaire focused on parking on grass verges and pavements, speeding, cyclist and pedestrian safety, and the frequency, extent and destinations of bus services, the only form of public transport to which Bromham has immediate access. The findings relating to these questions are summarised in Supporting Document 5 and are on Bromham Parish Council's website – <https://bromham.bedsparishes.gov.uk/a/10942793-11645147>, but the data generated have been used to develop a strategy to help people and traffic get around the village safely. We are still discussing the strategy with Bedford Borough Council but our objectives and policies are set out below.

| Policy Objectives relating to Getting Around the Village |
|---------------------------------------------------------------------|
| 1. To enhance safety measures for pedestrians and cyclists. |
| 2. To encourage better compliance with speed limits in the village. |
| 3. To discourage inconsiderate parking. |

C.1.5. There are clear links between motorists speeding and the safety of pedestrians and cyclists. If speeding were reduced, pedestrian and cyclist safety would immediately be improved, which would also help to promote sustainable travel in the village. Accordingly, in terms of developing policies, we considered these two objectives together.

Speeding

C.1.6. In developing our strategy, we considered average speed cameras, physical traffic calming measures (such as road humps, speed cushions etc.) vehicle activated signs, and village entrance gates. Any strategy needs to be realistic in financial terms as well as practically and technically feasible. The cost of average speed cameras and physical traffic calming measures makes them prohibitive in anything but the long term, unless Bedford Borough Council meets some of the cost: accordingly, we propose to focus on vehicle-activated signs and improving the impact of village gateways to make it clear to motorists that they are entering a village where speed limits apply. We believe that much speeding is inadvertent and that providing drivers with reminders of the speed they are travelling will help reduce speeding overall.

GA1 – Policy to Discourage Speeding

As funding becomes available, Bromham Parish Council will purchase portable vehicle activated signs that indicate vehicle speed. These signs will be located on permanent posts at various points in the village, based on technical advice from Bedford Borough Council. The signs will be moved between the various posts from time to time to avoid them becoming 'routine'.

Pedestrian Safety

C.1.7. In considering pedestrian safety, we were particularly concerned about children on their way to and from school or school bus pick-up and drop-off points. If safe footways, cycle-paths and crossing points are available it should encourage more use of them by parents and children. There have been protracted discussions about improving children's safety as well as minimising disruptions for residents in Grange Lane near the main entrance to the school. This is a matter between the school authorities and Bedford Borough Council, but we certainly support any proposals that effectively achieve those aims.

C.1.8. There are currently pedestrian crossings near the school entrance in Village Road and in Stagsden Road near the Quenby Way junction. Like average speed cameras, pedestrian crossings would be prohibitively expensive for the Parish Council to install and maintain. We believe pedestrian refuges offer increased safety to pedestrians, including parents with small children and unaccompanied older children, as well as having an inhibitory effect on speeding. A pedestrian refuge, or refuge island, is an island between two lanes of traffic moving in opposite directions, which helps pedestrians to cross a road in stages. There are currently pedestrian refuges in Bridge End, Stagsden Road and Northampton Road.

C.1.9. We recognise that pedestrian refuges may present difficulties for drivers of buses and large agricultural vehicles and have sought advice from Bedford Borough Council on these and other technical matters. The Parish Council will work with Bedford Borough Council to identify suitable locations for pedestrian refuges, or other more suitable crossing types. Subject to the outcome of these discussions we propose the following policy on pedestrian safety.

GA2 – Policy on enhancing pedestrian safety

Subject to funding becoming available, the Parish Council will support the installation of pedestrian refuges in areas of the village agreed with Bedford Borough Council.

C.1.10. The cost of pedestrian refuges means that it is likely that they would be introduced on a piecemeal basis.

Cyclist Safety

C.1.11. We are working with Bedford Borough Council to enhance cyclist safety through the introduction of cycle lanes on Stagsden Road. If they prove effective in increasing cycle use, and so enhance sustainability, we will consider the suitability of other roads in the village for incorporating cycle lanes.

GA3 – Policy on enhancing cyclist safety

Cycle lanes will be installed in both directions on Stagsden Road on a trial basis. If they are utilised and effective they will be made permanent, and consideration will be given to introducing cycle lanes on other roads in the village where they may be effective in improving safe cycling to and from Bromham village.

Inconsiderate Parking

C.1.12. The questionnaire elicited substantial concern about parking on pavements and grass verges. In winter and during wet weather, parking on grass verges can make them dangerous and unsightly, and more difficult to maintain. Stagsden Road, Woodland Drive and Grange Lane appear to have been the main problem areas in the past.

C.1.13. The solution to such parking is often the creation of a zone in which parking on pavements and verges is prohibited, with fines imposed for non-compliance. Street signs denote the beginning and end of such zones and, where the zone covers a long distance, there would be reminder signs. Such a zone is now in place in Grange Lane as part of the arrangements relating to the school.

C.1.14. We are reluctant to introduce more, possibly unnecessary, street signs in Bromham for a problem that appears to vary in location and intensity over time. It is not clear at present that there is a substantial and ongoing problem in the other two locations mentioned above, or anywhere else in the village. However, the Parish Council has an open mind on the subject and, if residents in particular streets believe there is a substantial problem, would assess the problem and consider introducing a prohibited parking zone.

Bus Services

C.1.15. Questionnaire responses suggested that more frequent services would result in greater bus use. However, since the questionnaire was concluded Milton Keynes Council has withdrawn funding for the '40' bus service because of lack of use, leaving the '41' service between Bedford and Northampton or Stagsden as the only regular service through the village.

C.1.16. The questionnaire also suggested considerable support for routing the X5 Oxford/Cambridge service through the village, as well as for new services to destinations other than Bedford. Kempston was the most popular potential destination.

C.1.17. The Parish Council has subsequently had discussions with representatives of Bedford Borough Council and Stagecoach about maintaining existing bus services and rerouting the X5 through the village. The cost of subsidising even the '41' Service, which remains relatively lightly used, means that it is under threat of being further curtailed. There was some optimism that Stagecoach may agree to the X5 Service stopping additionally somewhere on the A428 between Bromham and Biddenham but, after consideration, Stagecoach concluded that there is no suitable stopping place in that area.

C.1.18. Given the limited use of the current '41' service, and the current economic climate, we take the view that now is not the right time to seek a direct bus service to Kempston.

C.1.19. In any event, although we recognise buses' crucial contribution to more sustainable living and would like to see the current service more heavily used to help safeguard its future, Bromham Parish Council has no specific powers in relation to bus services, which ultimately are a matter for private sector providers. Accordingly, we have provided the data the questionnaire generated about bus services to Stagecoach as the service providers, and to Bedford Borough Council, which subsidises some rural bus routes.

C.2 - VILLAGE FACILITIES

C.2.1. We considered three types of facility during our consultation exercises: **cultural and amenity services** such as the churches and the library; **commercial and professional services**, such as shops and GP surgeries; and **sport, leisure and recreational services**. This section deals with the first two categories; leisure and wellbeing are covered in Section C.3 and facilities specific to children and young people in Section C.4.

C.2.2. The village already has a range of facilities, which is why it is designated a Rural Key Service Centre by Bedford Borough Council. Some of these facilities could absorb some or all of the additional demand generated by the new developments but others may need to expand, and in some cases new facilities may be required.

Cultural and Amenity Services

C.2.3. Bromham has two active and thriving church communities in St Owen's Church of England and Bromham Baptist Churches. We are sure that both would welcome additional church members from the new developments.

C.2.4. In response to the questionnaire, residents were strongly convinced of the importance of Bromham Library and supported the idea of longer library opening hours. Subsequently, Bedford Borough Council conducted a consultation on the future of all its library services, including Bromham Library. The outcome of that consultation was that Bromham Library continues to operate, and has longer opening hours, albeit it is unstaffed for a number of hours each day. Accordingly, users need an electronic access card to gain entry to the library when it is unstaffed.

C.2.5. Given the current position on public finances, this is a better outcome than many feared, and we are grateful to Bedford Borough Council that we still have a thriving library as a village asset. We urge residents to use it.

C.2.6 Similarly, the Village Hall attracted considerable support from residents and a substantial number wanted to see it more intensively used. Given the current level of use of the village hall, and the constraints on its greater use because of potential noise and nuisance disturbance given its proximity to houses, making ends meet is a constant issue.

C.2.7. During the neighbourhood planning process, a suggestion was made that it may be more effective to create a Leisure and Amenity Centre in the Beauchamp Park development adjacent to the area earmarked for sports pitches and courts. We believed that would also have the benefit of distributing village amenities more widely around the village. It would also have freed up the current site for use by the school if more land or buildings were needed for the school.

C.2.8. We proposed this idea at the public consultation event at the Village Hall in March 2018. The comments we received about the proposal from a broad spread of post codes within the village made very clear that people value the village hall in its current location. Accordingly, we accepted the views of residents and withdrew the proposal. Any building adjacent to the green space on Beauchamp Park will be facilities for the sporting pitches and courts located there rather than the Leisure and Amenity Centre that was proposed.

C.2.9. We have described in section B11(see paras B.11.11-14 on page 26 and 27) that we may make available a section of the playing field land behind the Village Hall for the school's use (as a playing field) if that is absolutely necessary to enable the school to expand. However, we would hope to keep the amount of land transferred for this use to an absolute minimum so as to retain as much of the playing fields as possible for public use.

Policy Objectives relating to Cultural and Public Services

1. To ensure that Bromham continues to have an appropriate range of cultural and amenity services.

Cultural and Amenity Service Policies

VF1 – To continue to support Bromham Library's existence as a lively and well-used local asset and resource.

Commercial and Professional Services

C.2.10. The village currently has a small supermarket, two general/convenience stores, a pharmacy, a petrol station that encompasses a car sales showroom and further convenience shop, two public houses and a fish and chip shop as well as two GP surgeries and an osteopaths' clinic. Although in many cases, these services could accommodate much of the additional demand from the new developments, the current parking provision for these facilities would come under additional stress.

C.2.11. Parking at the shopping centre at Avoca House in Molivers Lane and Bugden's supermarket can be difficult during peak times. Although our plan aims to enhance sustainability by encouraging people to walk and cycle more within the village through improved safety for pedestrians and cyclists, we accept that, for many, using a car is essential.

At the same time, given the extent of building around where they are located, it is simply not realistic to assume that new parking areas convenient for these shops can be found.

C.2.12. To try to address some of this pressure, subject to there being clear commercial demand, we will encourage the provision of a shop unit as part of the Beauchamp Park development if commercial demand can be demonstrated.

C.2.13. During the development of the plan we took the view that Bromham was relatively well served for GP's surgeries. There is a purpose-built medical centre with good facilities behind Avoca House in the centre of the village, with some dedicated parking space. There is also a GP practice on the upper floor of Avoca House. We contacted both practices and took the view that a substantial proportion of the additional demand for day-to-day medical services generated by new development could have been accommodated within these existing practices. The building behind Avoca House is only used on a part-time basis and the practice located within Avoca House had, at that stage, recently acquired alternative accommodation in the village to avoid elderly patients having to climb stairs in Avoca House. Many Bromham residents currently walk to these village-centre practices.

C.2.14. In February 2019, Bedford Clinical Commissioning Group consulted on a new purpose-built medical facility to accommodate the work of the two existing Bromham branch surgeries, but located in Biddenham, adjacent to Great Ouse Way. There is currently no safe pedestrian or cycle route from Bromham to the proposed medical centre because the only feasible route would require pedestrians and cyclists to cross Bromham Bridge, which has a narrow single carriage way without footways. It would not be a safe route for either category. Accordingly, users of the centre would, in reality, drive to the new centre, or catch a bus, albeit the return bus journey would require users to cross the busy Bromham Road – not easy for elderly people.

C.2.15. Planning consent was granted for the new medical centre in December 2019. Although, the Parish Council does not object in any way to its neighbours in Biddenham benefiting from new facilities, it continues to have grave doubts about all GP facilities being moved out of Bromham. Bromham has an older than average population and, together with the recent decision by the British Medical Association to seek the removal of home visits from GP contracts, the decision to move all GP services out of Bromham effectively forces people to drive to their GPs. This seems to us a somewhat blinkered approach given the clearly worsening climate crisis. The Parish Council continues to believe that there should be a GP and nurse presence within the village utilising either the existing medical facility behind Avoca House or space within the building associated with the Multi-Use games area in Beauchamp Park (See para B.5.7). Such a course would have the double benefit of being sustainable as well as retaining a service in the village that helps to create a sense of community.

Other Commercial Facilities

C.2.16. As part of the consultation exercise, we asked residents what additional commercial and professional facilities of this kind could make an important contribution to the village. The complete findings are at Supporting Document 5 and on the Bromham Parish Council website: <https://bromham.bedsparishes.gov.uk/a/10082578-10082733> - but bakers', butchers' and greengrocers' shops attracted some support (although the range of goods these shops would sell are currently available at some or all of the existing shops in the village). As with a new shop unit, any decision to provide a new commercial service in the village is a matter for the private sector, but the data on the website provide some indication of potential demand.

C.2.17. Both existing strategic priorities and the emerging Bedford Borough Local Plan 2030 contain a policy relating to proposals for new shops within local centres, such as Bromham, where there is a need. Bromham Parish Council supports these policies.

C.3 - LEISURE AND WELLBEING

Policy Objective for Leisure and Wellbeing

To enhance the range and volume of sporting and recreational facilities available to residents.

C.3.1. In terms of new and additional leisure and recreational facilities, the questionnaire findings suggested that tennis courts would be the most popular additional facilities for the village, but there was also some support for a cricket club, swimming pool and gym.

C.3.2. We are conscious that interest in different sports waxes and wanes over time; accordingly, we are keen to provide facilities for a broad range of sports, both for adults and children. One suggestion made to us is that a village 'Oval', or Multi-Use Games Area (MUGA) should be created. See Section B.5. The Oval would be a green space large enough to incorporate a small cricket pitch in the summer and football and or rugby pitches in the winter depending on demand. It would also provide a grassed area for joggers, walkers and people doing outdoor fitness training. We also plan to introduce tennis courts and space for netball and basketball courts close to, but not in, the Oval. We hope to provide changing facilities in the recreation area for organised activities.

C.3.3. Although the Oval, and courts would be managed on a day-to-day basis by a service provider, and would be available for public use and, in some cases, for hire, the organisation of sporting activities such as sports clubs or matches will be for private individuals and organisations.

C.4 – FACILITIES FOR CHILDREN AND YOUNG PEOPLE

Objective relating to facilities for children and young people

To increase the range of sporting and recreational facilities within the village for children and young people, and to maintain them to a good standard.

C.4.1. Facilities for children and young people is another theme we have pursued since beginning the neighbourhood planning process. We asked for ideas in this area at the launch event and in the questionnaire. We received some good responses which are in Supporting Document 5 and on the Bromham Parish Council website <https://bromham.bedsparishes.gov.uk/a/10082578-10082733> – although we are not sure that all the ideas came from young people! To address that uncertainty, we consulted children directly through Bromham Lower School, and Lincroft and Sharnbrook schools, albeit only pupils from Bromham Lower School responded in sufficient numbers to gather formally as data.

C.4.2. The children were asked what they liked about living in Bromham and what they would like to keep as it is, and what is missing at present that would make it a better place. We got some really interesting responses. These are summarised in Supporting Document 5 and on the Bromham Parish Council website <https://bromham.bedsparishes.gov.uk/a/8070292-12794937>.

C.4.3. All of the sources of data we received suggested the need for more play areas covering different age ranges and incorporating skateboard and mountain biking facilities, and an independent youth club. There was also support for tennis courts and a cricket club. The Oval discussed in Section B.5 would provide facilities for children and young people as well as adults.

C.4.4. We have discussed play areas with individual developers and hope that we have got the provision right, both in terms of equipment and facilities and the age ranges covered by each.

C.4.5. The Village Oval, and tennis and netball courts will also improve facilities for children and young people. See Section B.5.

C.5 - EMPLOYMENT AND BUSINESS

C.5.1. Bedford Borough Council did not ask Bromham to allocate land for industrial or commercial purposes, and large-scale development of that kind would not fit well with the rural character of the village. A substantial majority of questionnaire respondents considered that the proximity of Bedford and Milton Keynes, both relatively large employment centres, meant that providing new employment opportunities in the village was not essential. However, there was support for small-scale opportunities for business start-ups and jobs at Bromham Mill. This is considered in Section C.7 below.

C.6 THE HISTORIC ENVIRONMENT

C.6.1. Like many rural parishes, Bromham has a significant number of historic assets. Bedford Borough Council's Historic Environment Record contains records for over 130 historic assets in Bromham, including 28 listed buildings, 43 other buildings, 63 monuments, including one scheduled monument – Bromham Bridge – and two landscape reports. (See the short glossary at para C.6.8 below.) Bromham Park also contains the Grade 1 listed St Owen's Church and Grade II* listed Bromham Hall, both of which are described by Historic England as 'highly significant.' Para 85 of the National Planning Policy Framework suggests neighbourhood plans should set out a positive strategy for the conservation and enjoyment of the historic environment. The Parish Council's strategy is to ensure that those heritage assets that contribute most to the distinctive character of Bromham are maintained in a way that reflects their listing status. It would then ensure that any planning applications in the vicinity of these sites would take these assets status and environment into account. The Parish Council is not sufficiently resourced to support a more detailed strategy than this.

C.6.2. The most obvious of these historic assets are the listed buildings, which include St Owen's Church, Bromham Mill, and the Village Road site of the Primary School. Bromham Hall within Bromham Park is also a very important heritage asset, but its secluded nature means it is difficult to see the building from any publicly accessible land and so it has less historic resonance with residents.

There are also a number of private houses in Village Road and around the Green, and in Stagsden Road and Thistly Green which are also listed. Bromham Mill is one of the most iconic of these buildings and we are keen to see it much more intensively used for the benefit of the community. Our aspirations for Bromham Mill are dealt with separately in Section C7 below.

C.6.3. The 'buildings' category includes houses that aren't formally listed. These also include a number of private houses, largely concentrated in the same areas as the listed buildings, but there are also a number associated with the Northampton Road between Grange Lane and the junction with the A428.

C.6.4. The monuments are often more difficult to see, but the village's only scheduled monument is Bromham Bridge, is very visible, and is an historic asset we share with the parish of Biddenham. The section of the bridge from Bromham Mill to the riverbank on the south-eastern side of the river is in Bromham, and the section of the bridge south-east of the riverbank is in Biddenham.

C.6.5. Many of the other monuments can only be detected by cropmarks visible from aerial photographs or LIDAR imagery, which uses pulsed laser technology to build up a 3D digital representation of the target area. But Bromham has evidence of a range of such monuments encompassing probable medieval boundary ditches, Iron Age/Romano-British Enclosure Cropmarks, an Iron Age hut, a Village Pump, Lime Kilns, quarries, and a variety of earth-works.

C.6.6. We have considered the location of these historic assets in assessing potential development sites and believe that they would not be detrimentally affected, or that any potential impact could be effectively mitigated. The records we considered in coming to that view are at Supporting Document 14. Both existing strategic priorities and the emerging Bedford Borough Local Plan 2030 contain a strategic policy that sets out Bedford Borough's approach to the historic environment in considering planning applications and we expect all of the allocated developments to meet the requirements of that policy

C.6.7. As many of the listed buildings and other buildings are privately owned, and many of the monuments are located on private land we do not believe that it is appropriate for Bromham Parish Council to have separate policy objectives from those of Bedford Borough Council, which we support.

C.6.8. Some of the important heritage terms relevant to this plan are set out in the short glossary below.

The Historic England Listing System, which relates mostly to buildings includes –

Grade 1 – buildings of exceptional interest

Grade II* – particularly important buildings of more than special interest

Grade II – buildings that are of special interest, warranting every effort to preserve them.

Scheduled monument – a nationally important archaeological site or historic building given protection from unauthorised change.

A monument can be described as usually a three-dimensional structure which has become relevant to a social group as part of their remembrance of historical times or cultural heritage, due to its artistic, historical, political technical or architectural importance.

C.7 - BROMHAM MILL

C.7.1. Bromham Mill is currently owned and run by Bedford Borough Council. The first recorded mention of a water mill on the current Bromham Mill site was in 1622, although the current building is of a much later date. In addition to their heritage value, both the Mill buildings and the site are clearly important to residents as a place for walking, picnicking and occasionally gathering together for public events. However, until recently it was unused for much of the year and often cut a forlorn figure on a site that should be a vibrant and dynamic entrance to the village.

C.7.2. We share the view of residents that the Mill should be more intensively used. Since 2017 we have had an arrangement with Bedford Borough Council which allows us to open the café at the Mill seven days a week throughout the year rather than the previous week-end, spring and summer-based opening regime. We have also tried to step up the number events in the building or the grounds. These include children's events at Christmas and Easter, as well as the Duck Race every other May and Millfest in September. The aim was to complement the largest and most popular event, Apple Day which Bedford Borough currently organises in October each year.

C.7.3. But sharing a café – and, more importantly, sharing in the running of a site - is not easy, for all kinds of practical reasons.

C.7.4. Since June 2017, the Parish Council has been in discussion with Bedford Borough Council about handing over the day-to-day management of the Bromham Mill site to Bromham Mill Trust, a charitable organisation established by the Parish Council but with trustees from other local groups with an interest in the Mill. The Trust's sole focus would be the Mill and the additional amenity it could provide.

C.7.5. We believe a charitable trust would be better placed to attract funding and sponsorship to make the Mill a dynamic community hub. By this we mean it would be open every day with a café, offices/studios for small local businesses and organisations, space for local artists and musicians to showcase their work and where voluntary sector services could be explained. We believe that much could also be made of the Mill outbuildings if they were sensitively refurbished, and also that much more could be done to make the Mill as a popular centre for walkers, cyclists and river users.

C.7.6. In the outline business plan submitted to Bedford Borough Council we said – 'Our objectives are:

- To utilise the assets more intensively and so provide substantially increased amenity value and benefit to the local community.
- To develop the mill as a dynamic community hub through greater use of the buildings and land for events and activities, using the buildings for small community-based businesses and local groups, and ensuring that the café is open every day so that it becomes a meeting place for friends, walkers, cyclists and river-users. Relocating the parish office to the site would also add to the Mill's central role within the community.

C.7.7. The key outcomes would be:

- Greater value from the Mill as a heritage site, visitor attraction, nature reserve and open space in rural Bedfordshire
- Greater use of the Mill and its surroundings for education, recreation and social activities
- Increased involvement and satisfaction of the local community.

C.7.8. Discussions about Bromham Mill Trust leasing the site are continuing.

C.8 – ENVIRONMENT

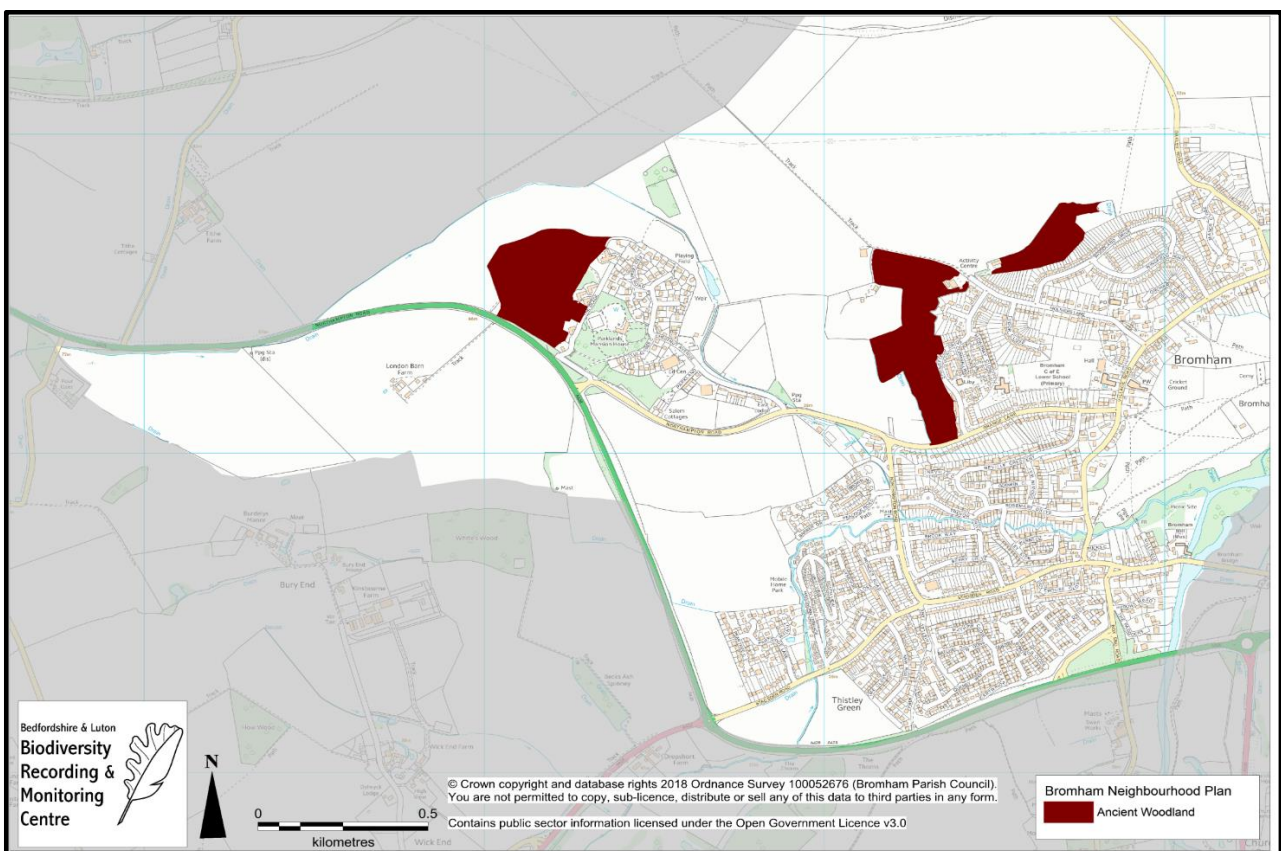
C.8.1. Bromham is still a rural village, rich in green spaces, surrounded by farmland and the river with its water meadows. It is clear from our consultation exercise that these green spaces are important to residents.

C.8.2. Particularly important is Bromham Park which, although privately owned, is accessible via public footpaths, providing a tranquil rural setting and green open space for the public to enjoy.

C.8.3. Other places within the village are also important to residents. The green space around Bromham Mill, Bromham Nature Reserve, the farmland, water meadows, footpaths and bridleways all contribute to the character and ambience of Bromham.

C.8.4. The village also has some hidden gems. Salem Thrift, Bowels Wood and Molivers Wood (See Map 10) are all examples of the remnants of ancient woodland. Salem Thrift has been in existence since at least 1300AD. It is owned and managed by Bromham Parish Council. Bowel's Wood appears on a map dated 1798, and Molivers Wood (once 'Maulwers' Wood) is referred to in a document dated 1651. Both of these sites are in private ownership but each of them makes an important contribution to Bromham's heritage and we are keen to see them preserved as living ecosystems and not detrimentally affected by new development. We commissioned ecological studies of Salem Thrift and Molivers Wood: the report on the studies is attached at Supporting Document 15 and are available on Bromham Parish Council's website: <https://bromham.bedsparishes.gov.uk/a/8070292-12794939>

Map 10 – Location of Salem Thrift, Bowels Wood and Molivers Wood Ancient Woodland



C.8.5. Given this green heritage, we also want to make a reality of residents' strong desire for new green spaces within the new developments.

| Objectives |
|------------------------------------------------------------------------------------------------------------------------|
| 1. To help to protect and preserve existing green spaces and to maintain access to them at least at the current level. |
| 2. To secure green open spaces within the new developments for both public enjoyment and for wildlife. |

C.8.6. Bromham Park is something of a special case because of its iconic status, its popularity with residents, and because it provides access to the church. We are mindful that the Park is privately owned and functions as part of a wider agricultural enterprise. We have had constructive discussions with the owners of Bromham Park Estate, who wish to maintain the Park to a good standard with a mixture of agricultural use and conservation areas while also continuing to allow public access to the area through the current network of footpaths. The Park's current owners are content to renew the agreement with the local authority to maintain the Park as a private open space.

C.8.7. Another major environmental feature in the village is Bromham Brook (more formally known as the River Stag), which has in the past flooded a number of times within the residential area of the village. Both the Beauchamp Park and Stagsden Rise Developments border on the Brook at various points. We have considered this as part of the flood-risk sequential test (See supporting document 11), and we expect these developments to comply with development plan policies which deal with flood risk.

C.8.8. The water quality in Bromham Brook will need to be protected from surface water run-off from these developments, including car parking, by an adequate sustainable drainage system. This will ensure the protection of wildlife in and around Bromham Brook. Natural England and the Environment Agency must be satisfied following consultation that sites designated under European Directive 92/44/EEC will not be affected downstream on the River Great Ouse. The advice of an ecologist was sought during the development of the plan to ensure that the relevant habitats regulations would not be breached by any of the proposals in this plan. The ecologist's report is at Supporting Document 16.

GE1. The Parish Council will continue to work with the owners of Bromham Park Estate to secure at least the current level of access for the public

GE2. Work will continue with the local highways authority to maintain existing public footpaths, permissive paths and bridleways.

GE3. Village greens and other public green spaces will continue to be maintained to a good standard, and, where necessary, liaison with owners of other green spaces will continue so as to maintain access to sites.

PART D - IMPLEMENTING AND MONITORING THE PLAN

D.1. Bedford Borough Council will be responsible for the implementation of the policies in Part B, the Planning Policies section of this plan, through the assessment of planning applications.

D.2. Bromham Parish Council will be responsible for the policies in the Community Aspirations section and for monitoring performance against the whole plan.

D.3. Each Annual Parish Meeting after the plan is adopted should receive a short but detailed report on implementation in the preceding 12 months from the Parish Council. The format of these reports will be a matter for the Chair of the Parish Meeting to determine.

D.4. There should also be regular updates about progress on the Parish Council website and in the parish magazine.

D.5. There should be a more thorough review of progress 5, 10 and 15 years into the implementation of the plan, which should be presented to the relevant Parish Meeting.

PARISH COUNCIL PRIORITIES FOR THE USE OF COMMUNITY INFRASTRUCTURE LEVY (CIL)

D.6. Although subject to change if circumstances require, the Parish Council's priorities for CIL money arising from the developments would be –

(a) contributions to improvements in any or all of the four junctions between village roads and the A428, albeit the most used junction, near the Bromham Road, Ouse Valley Way roundabout, actually lies within Biddenham Parish. This should help address the current delays, and consequent danger, of leaving and entering the village from the A428; and

(b) contributing to a safe pedestrian/cycle bridge across the River Great Ouse to create a safe and sustainable route between Bromham and Bedford. Although such a bridge alongside or parallel with the existing Bromham Bridge appears to be the best option, the Parish Council would consider and feasible alternative options.

Supporting Documents

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|------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Supporting Document 1 | Community Engagement Strategy |
| Supporting Document 2 | Village Questionnaire 2015 |
| Supporting Document 3 | Housing Needs Survey |
| Supporting Document 4 | Issues and Options Paper on Housing and Education and explanatory material relating to Old Stable Yard Development |
| Supporting Document 5 | Consultation Exercises - Summary of Findings |
| Supporting Document 6 | Strategic Environmental Assessment screening report. |
| Supporting Document 7 | Bedford Borough Council's Site Assessment and Selection Methodology |
| Supporting Document 8 | Bedford Borough Council's Highway, Access and Transport Surveys of Bromham Sites |
| Supporting Document 9 | Summary of Site Assessments |
| Supporting Document 10 | Bedfordshire Rural Communities Charity - Housing Needs Survey Report |
| Supporting Document 11 | Flood-Risk Sequential Test – Bromham Neighbourhood Area |
| Supporting Document 12 | CFA Archaeology – Archaeological Survey Land off Stagsden Road |
| Supporting Document 13 | Landscape Collective – Advice Note on Landscape, Heritage and Archaeology. |
| Supporting Document 14 | Bedford Borough Council Historic Environment Record relating to Bromham (with kind permission of Bedford Borough Council) |
| Supporting Document 15 | Ecological Survey of Salem Thrift and Molivers Wood |
| Supporting Document 16 | Habitat Regulations Assessment |

Bromham Neighbourhood Plan Group

c/o Bromham Parish Council

Bromham Village Hall

Village Road

Bromham

Bedford

MK43 8JP

Tel: 01234 828851

www.bromhamparish.co.uk



Bedford Borough Council Bromham Neighbourhood Plan POST- EXAMINATION DECISION STATEMENT

Regulation 18 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

This document is the decision statement required to be prepared under Regulation 18(2) of the Neighbourhood Planning Regulations 2012 (as amended). It sets out the response of Bedford Borough Council (“the Council”) to each of the recommendations contained within the independent examination report of the Bromham Neighbourhood Plan (“the Plan”) by independent examiner Wendy Burden, which was received by the Council on 5 June 2020.

This decision statement, the independent examiner’s report and the submission version of the Bromham Neighbourhood Plan and supporting documents can be viewed on the [neighbourhood planning pages](#) of the Council’s website.

BACKGROUND

Under the Town and Country Planning Act 1990 (as amended), the Council has a statutory duty to assist communities in the preparation of neighbourhood plans and to take plans through a process of examination and referendum. The Localism Act 2011 (Part 6, Chapter 3) sets out the Local Planning Authority's neighbourhood planning responsibilities.

This statement confirms that the modifications proposed in the examiner's report have been considered and accepted and that subject to making the recommended modifications (and other minor modifications) the Bromham Neighbourhood Plan may now be submitted to referendum.

The Bromham Neighbourhood Plan relates to the area that was designated by the Council as a Neighbourhood Area on 18 August 2014. This area is coterminous with the boundary of the parish of Bromham and is entirely within the Local Planning Authority's area.

Between 25 February to 8 April 2019, Bromham Parish Council undertook consultation on the draft Plan in accordance with Regulation 14.

Following the submission of the Bromham Neighbourhood Plan to the Council on 17 January 2020, the Council publicised the draft Plan for a six-week period and representations were invited in accordance with Regulation 16. This consultation took place between 27 January to 9 March 2020.

INDEPENDENT EXAMINATION

The Council appointed Wendy Burden, with the agreement of Bromham Parish Council, to undertake the independent examination of the Bromham Neighbourhood Plan and to prepare a report of the independent examination.

The examiner examined the Plan by way of written representations supported by an unaccompanied site visit of the Neighbourhood Plan Area on 29 April 2020.

The examiner's report was formally received by the Council on 5 June 2020. The report concludes that subject to making the modifications recommended by the examiner, the Plan meets the basic conditions set out in the legislation and should proceed to

referendum. The examiner also recommends that the referendum area should be the same as the designated Neighbourhood Area, which is the same as the administrative boundary for Bromham parish.

Following receipt of the examiner's report, legislation requires that the Council considers each of the modifications recommended, the reasons for them, and decides what action to take. The Council is also required to consider whether to extend the area to be covered by the referendum.

DECISION AND REASONS

Having considered each of the recommendations made in the examiner's report and the reasons for them, the Council has decided to accept all of the examiner's recommended modifications to the draft Plan. These are set out in Table 1 below.

The Council considers that, subject to the modifications being made to the Plan as set out in Table 1 below, the Bromham Neighbourhood Plan meets the basic conditions explained in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended), is compatible with the Human Rights Convention and that the requirements of paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) have been met.

The examiner recommended that the Plan should proceed to a referendum based on the designated Neighbourhood Area. The Council has considered this recommendation and the reasons for it, and has decided to accept it. The referendum area for the final Bromham Neighbourhood Plan will therefore be based on the designated Bromham Parish Neighbourhood Area.

These decisions were made by the Mayor on behalf of the Council's Executive on **date ???**.

As a consequence of the required modifications, the Council will alter the Bromham Neighbourhood Plan in order that it can proceed to referendum.

The Neighbourhood Plan document will be re-titled **Referendum Version**. The date for the referendum and further details will be publicised once a date is set by the Council (the referendum will not take place until May 2021 in line with the Local Government and Police and Crime Commissioner (Coronavirus) Postponement of Elections and Referendums) (England and Wales) Regulations 2020).

Table 1: Decisions on the Examiner's Recommended Modifications to the Bromham Neighbourhood Plan

| Proposed Modification Number | Bromham Neighbourhood Plan Reference | Examiner's Report Reference | Recommended Modification and Reason | Bedford Borough Council Decision/reasoning |
|-------------------------------------|---------------------------------------------|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| PM1 | P13 Policy HA1 | Page 15 | Delete the first paragraph. Insert "The sites set out below and shown on Map 2 are allocated for residential development. Any proposal for the development of an allocated site must meet the requirements of the relevant Policies of the Bedford Borough Council development plan before planning permission will be granted." | Agree with the modification for the reasons set out in the examiner's report |
| PM2 | P13 Policy HA2 | Page 16 | Delete Policy HA2. | Agree with the modification for the reasons set out in the examiner's report |
| PM3 | P18 Policy AH1 and AH2 | Page 16 | Delete Policy AH1. Policy AH2: in line 4 delete "should" and insert "shall". | Agree with the modification for the reasons set out in the examiner's report |
| PM4 | P23-24 Policy BP | Page 17 | BP1: add to existing, "Provision for the requirements listed within this Policy shall be included within a planning application for the development of the site. A Section 106 Agreement which includes the timescale for implementation of the provisions shall be concluded prior to the grant of any planning permission." BP2: in line 2 delete "that would" and insert "required to"; in line 4 delete "should" and insert "shall". | Agree with the modification for the reasons set out in the examiner's report |

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| | | | <p>BP3: delete “should” and insert “shall”.</p> <p>BP4: in line 1 delete “should” and insert “shall”; in line 3 delete “should” and insert “to”; in line 4 delete “should” and insert “shall”; in line 5 delete “would” and insert “are to”; in line 6 delete “would” and insert “will”.</p> <p>BP5: in line 1 delete “should” and insert “shall”; in line 2 delete “this could” and insert “to”.</p> <p>BP7: delete the first sentence and before “The potential –” insert “An assessment of commercial demand for a retail unit to serve the new neighbourhood shall be submitted to the local planning authority as part of the application for detailed planning permission of the development. The new unit to be located within Beauchamp Park with”. After “amenity” delete “would also need”.</p> <p>BP8: in line 1 delete “should” and insert “shall”; after “development” insert “in accordance with the requirements of the Highway Authority.”</p> <p>BP9: in line 1 delete “should” and insert “shall”.</p> <p>BP10: in lines 1, 3, 5 on page 23 delete “should” and insert “shall”. In first bullet point on page 24 delete “should” and insert “shall”. After “provided to” insert “discourage the passage of vehicular traffic through the scheme from Peacock Road and Barker Drive and to”.</p> | |
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| | | | <p>After “Highway Design Guidance” insert new bullet point “Subject to agreement with the Highway Authority measures to increase pedestrian and cyclist safety should include the provision of a safe pedestrian and cycle crossing of Stagsden Road between the northern and southern segments of Beauchamp Park to provide access to the Village Oval and other recreational facilities.”</p> <p>In the penultimate bullet point delete “should” and insert “shall”.</p> <p>In final bullet point insert before “An equipped”, “A new play area shall be provided to provide for a range of age groups together with”; delete “An” and insert “an”; delete “should” and insert “to”.</p> | |
| PM5 | P26-27 Policy SR | Page 18 | <p>SR1: add to existing, “Provision for the requirements listed within this Policy shall be included within the planning application for the development of the site. A Section 106 Agreement which includes the timescale for implementation of the provisions shall be reached prior to the grant of any planning permission.”</p> <p>SR2, SR3, SR4, SR6, SR7, SR8, SR9: delete all cases of “should” and insert “shall”.</p> <p>SR2: in line 2 delete “that would” and insert “are required to”.</p> <p>SR4: add after “play area”, “covering a range of age groups.”</p> | Agree with the modification for the reasons set out in the examiner’s report |

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| PM6 | P29-30 Policy OS | Page 18 | <p>OS2, OS3, OS7, OS8: delete all cases of “should” and insert “shall”.</p> <p>OS2: in line 2 delete “that would” and insert “to”.</p> <p>OS4: add to policy wording, “A Section 106 Agreement shall be completed between the local planning authority and the landowner of Bromham Park Estate to provide for the design, provision and future maintenance of the pedestrian and cycle track prior to the grant of planning permission for the residential development of Old Stable Yard. The track shall be completed and open for use prior to the occupation of the first new dwelling.”</p> <p>OS5: add after “Local Plan”, “Provision of public green open space shall be included within the planning application for the development of the site. A Section 106 Agreement which includes the timescale for provision of the public green open space shall be reached prior to the grant of any planning permission.”</p> | |
| PM7 | P30 Policy HA4 | Page 19 | <p>Second paragraph: in the first line delete “should” and insert “shall”.</p> | |
| PM8 | P31–32 Paragraph B.10.2 Policy CI.1 | Page 20 | <p>Paragraph B.10.2: in the second sentence delete after “listed” and insert “within the site specific policies to ensure that they are incorporated within future planning applications for the allocated sites. They contribute to the achievement of the following objective.”</p> | |

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| | | | Delete Policy CI 1. | |
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July 2020