

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 make modifications to the Brickhill 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 5 December 2025 in order to comply with the statutory deadline, and to inform those interested about the Council's decision.
- That arrangements to progress the Plan to the referendum stage of plan preparation are made.
- That the designated Brickhill Neighbourhood Area represents the appropriate geographical area to be covered by the referendum.

2. Date of decision

21 November 2025

3. Reasons for decision

The purpose of this report is to provide information about the examination of the Brickhill 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 Brickhill 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 date for the referendum is published, a claim for £20,000 from DLUHC 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

21 November 2025

Tom Wooten

Signed *Andrea Spice*

Date:

21 November 2025

Name of Decision Taker:

Cllr. Andrea Spice

Portfolio Holder for Economic Growth, Planning and Prosperity

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:**21 November 2025**.....

Date decision can be implemented if not called in:**2 December 2025**.....

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

Bedford Borough Council – Report to Portfolio Holder for Economic Growth, Planning and Prosperity

Date of Meeting: 21 November 2025

Report by: Head of Planning & Building Control

Subject: BRICKHILL NEIGHBOURHOOD PLAN

1. EXECUTIVE SUMMARY

- 1.1 Neighbourhood plans are statutory development plans produced by parish/town councils or neighbourhood forums. Brickhill Parish Council has produced a neighbourhood plan for the Brickhill parish area.
- 1.2 The Plan was submitted to Bedford Borough Council on 10 March 2025 and, in line with regulatory requirements, was subject to a six-week consultation (6 May – 20 June 2025). It has since been formally examined by an independent examiner.
- 1.3 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.
- 1.4 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.
- 1.5 Bedford Borough 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 Bedford Borough Council must also decide whether the referendum area should be extended beyond the neighbourhood area, which in this case is Brickhill Parish.

2. RECOMMENDATIONS

The Portfolio Holder for Economic Growth, Planning and Prosperity is asked to consider this report and, if satisfied:

- (1) To agree to make modifications to the Brickhill 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.
- (2) That the formal Decision Statement (Appendix C) be published by 5 December 2025 in order to comply with the statutory deadline, and to inform those interested about Bedford Borough Council's decision.
- (3) That arrangements to progress the Plan to the referendum stage of preparation are made.
- (4) That the designated Brickhill Neighbourhood Area represents the appropriate geographical area to be covered by the referendum.

3. REASON FOR RECOMMENDATIONS

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

4. THE CURRENT POSITION

- 4.1 The Examiner's report has been received and this has recommended that the Brickhill Neighbourhood Plan proceed to referendum (subject to modifications). The next stage in the process is to obtain approval to proceed to referendum, which is subject to Executive approval.

5. DETAILS

- 5.1 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 Bedford Borough 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.

- 5.2 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.
- 5.3 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

- 5.4 Neighbourhood plans must be examined by a suitably qualified independent person, appointed by Bedford Borough Council and agreed by the qualifying body.
- 5.5 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.
- 5.6 Legislation requires that Bedford Borough Council considers each of the recommendations made by the examiner in his/her report and decides what action to take in response. This decision must be published within five weeks of the receipt of the examiner's report.

The Referendum

- 5.7 Anyone who can usually vote in a local election and who is a resident in the referendum area can vote in a neighbourhood plan referendum. The plan must pass by a simple majority and there is no minimum turnout. If a simple majority is achieved Bedford Borough Council will be required to 'make' (adopt) the plan unless it breaches EU or human rights legislation.
- 5.8 Bedford Borough Council must hold a referendum within 56 working days from the date that the decision to take the plan forward to a referendum is published. Bedford Borough Council must also publish notice that the referendum will take place not fewer than 28 days before the referendum date.

The Brickhill Neighbourhood Plan

Progress of Brickhill Neighbourhood Plan	
Neighbourhood area designated	8 September 2016
Draft plan consultation (Regulation 14)	8 April – 30 May 2024
Post submission consultation (Regulation 16)	6 May – 20 June 2025
Submitted for examination by BBC	21 July 2025
Examiner's report received	30 October 2025

- 5.9 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 Brickhill Neighbourhood Development 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 – Brickhill Parish Council;
- The Plan has been prepared for an area properly designated – the Parish of Brickhill, as shown on Figure 2 (page 6) of the Neighbourhood Plan;
- The Plan specifies the period to which it is to take effect, 2024 to 2034; and
- The policies (as proposed to be modified) relate to the development and use of land for a designated neighbourhood area.

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.

5.10 The examiner proposes recommendations as follows:

Proposed modification number (PM)	Submitted Neighbourhood Plan Para no/ other reference	Examiner's Recommended Modification	Reason for recommendation
PM1		<p>Clause 1: after "should", insert "seek to".</p> <p>Clause 3: after "should", delete "not" and insert "avoid".</p> <p>Clause 4: after "avoid", insert "significant".</p> <p>Clause 4b: add:</p> <p>"as defined in Defra's Agricultural Land Classification unless it can be proven that an individual site does not fall within Grades 1 or 2."</p> <p>Add new Clause 5:</p> <p>"A Statement of Biodiversity Priorities and a Local Habitat Map is to be identified in Bedfordshire's Local Nature Recovery Plan due to be published in December 2025. Opportunities to support the priorities set out in the Strategy should be taken wherever possible."</p>	<p>In the interests of clarity and to avoid being over prescriptive.</p> <p>To provide guidance as to how clause 1 might be achieved.</p>

PM2		Add under the list of designated Local Green Space a new clause: “Policies for managing development within a Local Green Space should be consistent with those for Green Belts.”	It would add to the clarity and effectiveness of the Policy.
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- 5.11 These recommendations serve to ensure that the plan meets the basic conditions. Officers, therefore, recommend that they are agreed and the Brickhill Neighbourhood Plan be amended accordingly.
- 5.12 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 4.32 of the examiner’s report). Only one 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.
- 5.13 The Brickhill Neighbourhood Plan incorporating the examiner’s proposed modifications and other minor modifications can be found at Appendix B.

Examination Area

- 5.14 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

- 5.15 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. ALTERNATIVES CONSIDERED AND REJECTED

- 6.1 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 Brickhill 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.

7. KEY IMPLICATIONS

7.1 Legal Issues – relevant legal power

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 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 Bedford Borough 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 Brickhill Neighbourhood Plan must be published by 7 December 2025

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 Brickhill 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.

7.2 Policy Issues

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.

7.3 Resource Issues

The Government provides funding to assist councils to fulfil their neighbourhood planning duties. Once the date for the referendum is published, a claim for £20,000 can be made in the next available claim window (likely to be late 2025). This represents a contribution towards Bedford Borough 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 Bedford Borough 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.

7.4 Risks

The recommendations in the examination report are not binding, but if Bedford Borough 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 Bedford Borough 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.

7.5 Environmental Implications

The Brickhill Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by Brickhill 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. 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.

7.6 Equalities Impact

In preparing this report, due consideration has been given to Bedford 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 Brickhill Neighbourhood 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 Brickhill Neighbourhood Development Plan is relevant to Brickhill 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 and is included in the Basic Conditions Statement.

7.7 Impact on Families

The Neighbourhood Plan will have no direct impact on families.

7.8 Community Safety and Resilience

The Neighbourhood Plan will have no impact on community safety and resilience.

7.9 Impact on Health and Wellbeing

The Brickhill Neighbourhood Plan will not have a direct impact on health and wellbeing.

8. SUMMARY OF CONSULTATIONS AND OUTCOME

8.1 The following Councillors, Council units, Officers and/or other organisations have been consulted in preparing this report:

Portfolio Holder for Economic Growth, Planning and Prosperity
Service Director Regulation, Housing and Customer Contact
Relevant Managers

9. WARD COUNCILLOR VIEWS

9.1 Not applicable.

10. CONTACTS AND REFERENCES

Report Contact Officer:	Sonia Gallaher, Senior Planner Sonia.gallaher@bedford.gov.uk
Declarations of Interest by the Report Author:	N/A
File Reference:	Brickhill Neighbourhood Plan 2025
Previous Relevant Minutes:	N/A
Background Papers:	N/A
Appendices:	Appendix A – Examiner’s Report Appendix B – Brickhill Neighbourhood Plan showing modifications Appendix C – Decision Statement

Report on Brickhill Neighbourhood Development Plan 2024 - 2034

An Examination undertaken for Bedford Borough Council with the support of Brickhill Parish Council on the March 2025 submission version of the Plan.

Independent Examiner: Wendy Burden BA (Hons) DipTP MRTPI

Date of Report: 30 October 2025

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Main Findings - Executive Summary

From my examination of the Brickhill Neighbourhood Development 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 – Brickhill Parish Council;
- The Plan has been prepared for an area properly designated – the Parish of Brickhill, as shown on Figure 2 (page 6) of the Neighbourhood Plan;
- The Plan specifies the period to which it is to take effect, 2024 to 2034; and
- The policies (as proposed to be modified) 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

Brickhill Neighbourhood Development Plan 2024-2034

- 1.1 The Parish of Brickhill was designated by Bedford Borough Council (BBC) as a Neighbourhood Area on 8 September 2016 and, following changes to the parish boundary, was updated on 16 September 2019¹ as shown in Figure 2 of the BNP. This reflects the full extent of the administrative boundary of the parish.
- 1.2 A public meeting was held to discuss neighbourhood plans by Brickhill Parish Council (BPC) in January 2020 and the intention to produce a neighbourhood plan was set out in a Parish Newsletter in February 2020. This was followed by an online survey in February - March 2020. Consultation and preparation of the Brickhill Neighbourhood Plan (BNP) has been led by BPC.
- 1.3 Brickhill changed from a rural community into a developed settlement following the end of World War II when Bedford was identified for a growth in population from 58,000 to 75,000. Construction started in

¹ <https://www.bedford.gov.uk/planning-and-building-control/planning-policy/neighbourhood-planning/designated-neighbourhood-areas>

South Brickhill in 1959 and North Brickhill was developed between 1966 and the 1980s. A further large development was permitted on the edge of Brickhill in Ravensden Parish in 2002 which now forms the Woodland Park Estate of 500 homes with the surrounding North Brickhill Country Park.

- 1.4 In 2015, the whole area became part of BPC, together with farmland to the north and Highfield House a Grade II Listed Building. A further Community Governance Review resulted in the transfer of Ashmead Road football pitches, St Thomas More School and adjacent areas from Clapham Parish Council to BPC.
- 1.5 The planned route for the East West Rail will pass through farmland in the northern part of Brickhill Parish close to Highfield House. The BNP will be a matter to be taken into account in a Local Impact Report which BBC is to prepare.
- 1.6 The BNP is required to be in general conformity with the strategic policies of the statutory Development Plan, which includes the saved policies of the Allocations and Designations Local Plan (ADLP) 2013 and the Bedford Local Plan 2030 (BLP 2030) adopted in 2020. A review of the BLP was taken forward by BBC with the Bedford Local Plan 2040 (BLP 2040) being submitted for examination in July 2022. However, in November 2023 the Planning Inspector raised significant concerns about the soundness of the BLP 2040, and in June 2025 he advised that the submitted plan was no longer capable of being made sound, recommending that it be withdrawn. As a consequence, the BLP2040 was formally withdrawn by BBC on 8 October 2025 so will not proceed to adoption. Accordingly, the extant development plan for the purposes of assessing the Neighbourhood Plan against the Basic Conditions² remains the saved ADLP policies and the BLP 2030. Whilst I am aware that the PPG provides advice in relation to an emerging Local Plan³, given the BLP2040 has now been withdrawn, I give limited regard to that advice.

The Independent Examiner

- 1.7 As the BNP has now reached the examination stage, I have been appointed as the examiner of the Plan by BBC, with the agreement of BPC.
- 1.8 I am a chartered town planner and retired government Planning Inspector, with some 50 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.

² See paragraph 1.12 below.

³ See PPG Reference ID: 41-009-20190509.

The Scope of the Examination

- 1.9 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.
- 1.10 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended)('the 1990 Act'). The examiner must consider:
- Whether the plan meets the Basic Conditions.
 - Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development'; and
 - 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.
 - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').
- 1.11 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

1.12 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 (under retained EU law)⁴; and
- Meet prescribed conditions and comply with prescribed matters.

1.13 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 2017.⁵

2. Approach to the Examination

Planning Policy Context

2.1 As set out in paragraph 1.6 above, the current Development Plan for the purposes of the examination of the BNP comprises the saved policies of the ADLP and the BLP2030 (which was adopted in January 2020).

2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The BNP was submitted to BBC on the 10 March 2025 therefore all references in this report are to the December 2023 NPPF and its accompanying PPG.⁶ The PPG offers advice on how the NPPF should be implemented.

⁴ The existing body of environmental regulation is retained in UK law.

⁵ 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.

⁶ A revised NPPF was published on 12 December 2024 which includes transitional arrangements for neighbourhood plans. Paragraph 239 of the December 2024 NPPF advises that its policies will only apply to neighbourhood plans submitted after 12 March 2025.

Submitted Documents

2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, alongside those submitted. These include the:

- Brickhill Neighbourhood Plan 2024 to 2034, submission version March 2025;
- Brickhill Neighbourhood Plan Basic Conditions Statement, March 2025;
- Brickhill Neighbourhood Plan Consultation Statement, March 2025;
- Brickhill Neighbourhood Plan Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment Screening Report, March 2024;
- Brickhill Neighbourhood Plan – Local Green Space Assessment, March 2025;
- Brickhill Neighbourhood Plan Supporting Documents;
- The Regulation 16 responses;
- Procedural matters and questions letter from the examiner, 28 July 2025; and
- The responses from BBC dated 6 August 2025 and from BPC dated 10 August 2025 to the examiner's questions.⁷

Site Visit

2.4 I visited the Neighbourhood Plan Area unaccompanied by any interested party on the 13 August 2025. 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

2.5 This examination has been carried out on the basis of the written submissions (written representations). The Regulation 16 consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum. In addition to the Regulation 16 responses, I have received further necessary clarifications through the exchange of correspondence during the examination (see Paragraph 2.3 above). As a result, in terms of the appropriate level of scrutiny for the BNP, I consider that hearing sessions are not necessary.

Modifications

2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal

⁷ View at: <https://www.bedford.gov.uk/planning-and-building-control/planning-policy/neighbourhood-planning/brickhill-neighbourhood-plan>

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 Brickhill Neighbourhood Plan has been prepared and submitted for examination by BPC, which is the qualifying body for an area that was initially designated by BBC in September 2016, and redesignated in September 2019 to incorporate changes to the administrative boundary of the Parish (see paragraph 1.1 above).
- 3.2 It is the only Neighbourhood Plan for Brickhill Parish and does not relate to any land outside the designated Neighbourhood Plan Area.

Plan Period

- 3.3 The Plan specifies the period to which it is to take effect on the front cover which is 2024 - 2034. Whilst the BNP covers a period which extends beyond that of the adopted BLP2030, there is no statutory requirement for the respective plan periods to align. I content that it does not give rise to any substantive issues in relation to compliance with the Basic Conditions.

Neighbourhood Plan Preparation and Consultation

- 3.4 Following the approval by BBC of the designation of the Brickhill Neighbourhood Plan Area, BPC has had responsibility for the process of preparing the BNP.
- 3.5 The BNP is based on evidence from surveys, expert reports and local consultations. A detailed record of the consultation process is set out in the Consultation Statement. A number of documents which have been produced for BBC have been referred to in the BNP and are listed on the BNP website. They include the Bedford Borough Local Housing Needs Assessment Report of Findings 2021 by Opinion Research Service.
- 3.6 Between January 2020 and September 2023 an online survey was undertaken; regular communications and discussions were held with local stakeholders; feedback was sought on potential Local Green Space (LGS) sites; a newsletter was published, and a questionnaire was provided for residents. A drop in session was held in September 2023. The draft version of the BNP was made available for the statutory Regulation 14 consultation, which took place from 8 April to the 30 May 2024. Some changes were made to the BNP following the Regulation 14 consultation and the BNP was then submitted to BBC on the 10 March 2025. Regulation 16 consultation was carried out from 6 May to 20 June 2025.

For the purposes of the examination, I have taken into account the comments in the published responses from the Regulation 16 consultation exercises.

- 3.7 I am satisfied that a sufficiently transparent, fair and inclusive consultation process has been followed for the BNP. Due regard has been had to the advice in the PPG on plan preparation and engagement, and I consider that the BNP is procedurally compliant in accordance with the legal requirements.

Development and Use of Land

- 3.8 With the modifications which I recommend, the Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

Excluded Development

- 3.9 The Plan does not include provisions and policies for 'excluded development'.⁸

Human Rights

- 3.10 No issues have been raised in relation to any potential 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 on behalf of BPC to determine whether or not the Plan requires Strategic Environmental Assessment and Habitats Regulations Assessment (SEA and HRA).⁹ The assessment concludes that it is unlikely there will be any significant environmental effects arising from the BNP. Natural England, the Environment Agency and Historic England agree with this conclusion and I find no reason to conclude otherwise.
- 4.2 Having reviewed the respective SEA and HRA screening reports, I have no reason to disagree with the conclusions of the assessments. I am therefore content that the Plan complies with the relevant EU obligations as retained in UK law.

⁸ See section 61K of the 1990 Act.

⁹ Brickhill Neighbourhood Plan Strategic Environmental Assessment and Habitat Regulation Assessment Screening Reports, March 2024.

Main Issues

4.3 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

4.4 The BNP sets out the background and context to its preparation and provides a broad description of the character and the appearance of the Plan area, with the development of the Parish and its rural heritage. The vision for the BNP set out on Page 7 has been developed to reflect the priorities of the community and helps set the future of the Parish.

4.5 There are four Planning Aims at Paragraph 2.2 which are based on the vision and the views of the community as expressed through the consultation exercises. The Plan policies are founded in the themes identified in the vision and generally relate to the matters identified in NPPF, Paragraph 28, as appropriate matters to be addressed through non-strategic policies in neighbourhood plans. The BNP is positively prepared and it has been shaped through early, proportionate and effective engagement within the local community.

4.6 In general, the policies of the BNP are clearly written and unambiguous.¹⁰ However, in my letter of the 28 July 2025, I raised some matters of clarification and issues identified in responses to the Regulation 16 consultation. I received the response from BPC on the 10 August and will recommend modifications where necessary to meet the Basic Conditions.

4.7 I have paid close regard to all the comments which I have received both in the Regulation 16 submissions and in response to my questions. As a result, I have concluded that recommendations for amendment or deletion are necessary to some policies in order to have due regard to national policy and advice¹¹ and to ensure general conformity with the strategic policies of the BLP in order that the Basic Conditions are met. I deal with matters of compliance in my commentary on each Policy later in this report.

4.8 Having regard to the work which has been carried out and the range of policies which have been formulated to meet its vision and objectives, I am satisfied that the BNP demonstrates a positive approach to the implementation of the policies of the Bedford Development Plan. Subject

¹⁰ PPG Reference ID: 41-041-20140306.

¹¹ In order to meet the Basic Conditions, the Plan must have regard to national policies and advice contained in guidance issued by the Secretary of State, as noted in Paragraph 1.12 above.

to the modifications which I recommend, the BNP has had regard to national policy and advice.

Contributes to the Achievement of Sustainable Development

- 4.9 The policies of the submitted BNP have regard to the economic, social and environmental needs of the local community. Furthermore, the Plan accords with NPPF, Paragraph 29, since it generally complements and delivers the strategic policies for the area.
- 4.10 The three overarching objectives of sustainable development (economic, social and environmental) are integral to the core aims of the BNP. Together with the policies of the Bedford Development Plan, the policies and proposals of the BNP contribute to the achievement of sustainable development in accordance with national policies and advice.
- 4.11 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

- 4.12 I set out the planning policy context for the BNP in section 2 above. As part of the statutory Development Plan, the BLP 2030 sets out the strategic policies to be taken into account in the BNP. The policies in the submitted BNP are required to be in general conformity with those that are strategic in the statutory Development Plan in order to meet the Basic Conditions.
- 4.13 Although a draft neighbourhood plan is not tested against the policies in an emerging local plan, the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the Basic Conditions against which a neighbourhood plan is tested.¹² In this case, the emerging BLP 2040 has very recently been withdrawn. Accordingly, under the circumstances (and as noted in paragraph 1.6 above) I give limited regard to this advice in the PPG.
- 4.14 In the adopted BLP 2030, the built up area of Brickhill lies within the Urban Area Boundary as designated in Policy AD41 of the ADLP 2013. The urban area boundary encloses the area where policies relevant to built-up areas apply and beyond which policies relevant to the countryside apply. The farmland and green spaces within the Parish boundary which lie outside the Urban Area Boundary are subject to the countryside policies of the BLP 2030 as set out in Policy 7S.

¹² PPG Reference ID: 41-009-20190509.

- 4.15 The BNP has generally been developed with proper regard to the strategic direction and policies of the BBC Development Plan, which I identify in Section 2 above. BBC has been involved throughout the preparation of the BNP and is generally supportive of its policies.
- 4.16 Subject to the modifications which I recommend 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

Policy BR-SG1: Local Employment

- 4.17 The Policy encourages development within Use Class E(g) which includes certain types of office, research and development, and industrial processes which would not cause harm to residential amenities. It also seeks to retain employment sites and premises unless it can be proven they are no longer viable. Whilst the Policy encourages a limited category of employment use, it does not preclude other use classes of employment and is not unduly restrictive. The Policy complies with the Basic Conditions.

Policy BR-SG2: Local Facilities

- 4.18 Policy BR-SG2 identifies the locations where new community facilities will be supported and seeks to retain units in uses open to the public and shopfronts. The Policy accords with Policies 82 and 83 of the BLP 2030 and complies with the Basic Conditions.

Policy BR-SG3: Residential Development

- 4.19 This Policy sets out the locations in which new residential development will be supported and seeks to ensure that new residential development meets the needs of the Parish. Studies have been carried out for BBC which provide evidence of the housing needs of Brickhill, in particular the need for older persons accommodation.¹³ With regard to Clause 4, since the storage of refuse bins is within 8 metres of buildings within many existing developments it would be unreasonable to make it a requirement of the Policy for such storage to be some 8 metres from any buildings in new developments. The Policy therefore complies with the Basic Conditions.
- 4.20 BPC has suggested an amendment to the final clause of the "Interpretation" with regard to water stress and local flooding. I consider that such an amendment is not necessary for the BNP to meet the Basic Conditions. However, it would be open to BPC, in consultation with BBC, to amend the text before the BNP continues to referendum, provided any

¹³ BBC Older Persons' Accommodation Strategy 2018-2023; BBC Local Housing Needs Assessment Report of Findings by Opinion Research Service 2021.

such revision reasonably falls within the scope of a minor (non-material) amendment.¹⁴

Policy BR-LE1: Green Environment

- 4.21 The Policy seeks to protect and enhance biodiversity and the specific locations listed in Clause 3. Bedfordshire's Local Nature Recovery Strategy is subject to public consultation and due to be published in December 2025. In the interests of providing guidance on how Clause 1 might be achieved, I put forward a modification to refer to this Strategy within Clause 1 of the Policy. I note that further clarification of the ways in which this will be achieved is set out below the Policy under "Interpretation". I propose some other changes to the wording of clauses in the Policy in the interests of clarity and to avoid being over prescriptive **[PM1]**. With these changes the Policy complies with the Basic Conditions.

Policy BR-LE2: Local Green Spaces

- 4.22 The Policy identifies seven Local Green Spaces (LGS) within Brickhill which would be additional to the three LGS designated in the BLP 2030. The seven proposed new LGS are within the ownership of BBC.¹⁵ They have each been the subject of appraisal¹⁶ and no objections have been raised to their designation. I have visited each of the sites and am satisfied that they meet the criteria for designation.
- 4.23 Comments have been made in the response to consultation that the BNP Policy does not clarify the basis for decision making on planning applications on designated LGS. I note the BPC comments that they do not wish to repeat Government policy in the BNP policies, and also that Policy 45 of the BLP 2030 sets out the basis for control of development of LGS. However, I consider that it would add to the clarity and effectiveness of the Policy if a clause is added as set out in **PM2** to assist users of the Plan.¹⁷ I am satisfied that with this addition the Policy complies with the Basic Conditions.

Policy BR-LE3: Local Heritage

- 4.24 The Policy requires that new development avoids harm to the route of the historic lane in Falcon Avenue. Development should have no adverse impact on, and should take opportunities to enhance, the significance and settings of 3 identified non designated heritage assets. It also states that development should take account of potential impacts on the archaeological remains within the North Brickhill Country Park. The policy

¹⁴ See paragraph 4.32 below.

¹⁵ Source: BPC response of 10 August 2025 to the Examiner's questions.

¹⁶ Brickhill Neighbourhood Plan Local Green Space Assessment.

¹⁷ By way of exception to Paragraph 16 f) of the NPPF, it has in my experience become commonplace in neighbourhood plans to restate NPPF Paragraph 107 in relation to LGS in order to reinforce the local importance attached to their protection.

has regard to Section 16 of the NPPF and complies with the Basic Conditions.

Policy BR-SD1: Place and Context

- 4.25 Policy BR-SD1 sets out the criteria to be met for new development to respond positively to local townscape and landscape characteristics. The Policy complies with the Basic Conditions.

Policy BR-SD2: Green Design

- 4.26 This Policy addresses local concerns without repeating the requirements of BLP 2030 Policies 52, 53, and 54 which address issues of water demand, development layout and energy efficiency. It also states that new development should take account of the Green Guidance Note in Section 9 of the Plan. The Policy complies with the Basic Conditions.

Policy TM1: Sustainable Transport

- 4.27 The Policy sets out the priorities for the achievement of sustainable transport and active travel, to enhance pedestrian connectivity. It is in general conformity with the BLP 2030 policies on sustainable transport and meets the Basic Conditions.

Policy TM2: Rights of Way

- 4.28 Policy TM2 complements the policies in the BLP 2030 and sets out the five types of impact on Rights of Way which need to be considered in relation to new development. It complies with the Basic Conditions.

Green Guidance Note

- 4.29 Section 09 of the BNP sets out guidance for developers on green design. It is not intended to form part of the statutory Development Plan and does make reference to non-planning matters. Although I have taken note of the guidance notes, they will not form part of the statutory Development Plan for the area and are not therefore considered against the Basic Conditions.¹⁸

Future Review

- 4.30 The Plan Period for the BNP covers runs from 2024-2034 and it is intended that the BNP be reviewed every two years. This would enable the BNP to be aligned with any review of the BLP 2030, that follows withdrawal of the BLP2040 from examination.

¹⁸ PPG Reference ID: 41-004-20190509.

- 4.31 There is no statutory requirement for a neighbourhood plan to be reviewed, although local plans are required to be reviewed at least every five years.¹⁹ Nevertheless it would be appropriate for a review of the BNP to be carried out in response to changes in relevant national and Local Plan policies. This would enable the BNP to remain relevant and complementary to national and Local Plan policies.

Factual and Minor Amendments and Updates

- 4.32 I have not identified any typographical errors in the text of the BNP that would affect the Basic Conditions. Minor amendments to the text and to the numbering of Policies can be made consequential to the recommended modifications, alongside any other minor non-material changes or updates, in agreement between BPC and BBC.²⁰

5. Conclusions

Summary

- 5.1 The Brickhill Neighbourhood Development 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, together with the evidence documents submitted with the Plan and in the course of my examination.
- 5.2 I have made recommendations to modify two policies to ensure that 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 Brickhill Neighbourhood Development 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.

¹⁹ Regulation 10A Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

²⁰ PPG Reference ID: 41-106-20190509.

Overview

- 5.5 The production of the BNP has undoubtedly required a high level of commitment and hard work by the Parish Council and other volunteers from the local community. This task has no doubt been made more difficult by the abnormal conditions arising from COVID-19. I commend the Parish Council and the Neighbourhood Plan Steering Group for their hard work and application in producing a well written and effective Neighbourhood Plan, reflected in the very small number of examiner recommended modifications.
- 5.6 I am satisfied that BPC has consulted with and taken into account the views of the local community, whilst seeking to protect the character and setting of the settlement of Brickhill as an attractive neighbourhood adjoining the countryside. As a result, the BNP, with the recommended modifications appended to my report, meets the Basic Conditions. The modified BNP has the potential to provide an effective Plan for the management of the future planning of Brickhill.

Wendy J Burden

Examiner

Appendix: Modifications

Note: Some consequential renumbering, amendment to alphabetical listings etc within the Plan will be necessary as a consequence of the PMs set out below.

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Page 24 Policy BR-LEI and Interpretation	<p>Clause 1: after “should”, insert “seek to”.</p> <p>Clause 3: after “should”, delete “not” and insert “avoid”.</p> <p>Clause 4: after “avoid”, insert “significant”.</p> <p>Clause 4b: add:</p> <p>“as defined in Defra’s Agricultural Land Classification unless it can be proven that an individual site does not fall within Grades 1 or 2.”</p> <p>Add new Clause 5:</p> <p>“A Statement of Biodiversity Priorities and a Local Habitat Map is to be identified in Bedfordshire’s Local Nature Recovery Plan due to be published in December 2025. Opportunities to support the priorities set out in the Strategy should be taken wherever possible.”</p>
PM2	Page 27 Policy BR-LE2	<p>Add under the list of designated Local Green Space a new clause:</p> <p>“Policies for managing development within a Local Green Space should be consistent with those for Green Belts.”</p>

Brickhill Neighbourhood Plan 2024-2034

~~Submission Version 3.6~~

~~March 2025~~

Version showing changes made by the Examiner. Deletions strike through and new text in yellow.



Brickhill Neighbourhood Plan

Front cover picture (Figure 1) shows Rooksmead Pond, which is one of the spaces designated as Local Green Space by this Plan.

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1. Introduction

1.1 Planning Framework for Brickhill

The Brickhill Neighbourhood Plan ('the Plan') sets out a vision and planning framework for Brickhill up to the end of 2034. The vision translates into aims and a set of policies to guide future development.

The Brickhill Neighbourhood Plan has been prepared by Brickhill Parish Council, supported by a Steering Group of local residents and parish councillors.

1.2 Status of the Neighbourhood Plan

Once 'made', the neighbourhood plan forms part of the statutory development plan for the area, together with the adopted local plan. Planning applications are required by Section 38 of the Planning and Compulsory Purchase Act to be determined in accordance with the statutory development plan, unless material considerations indicate otherwise.

The neighbourhood plan meets the Basic Conditions set out in planning legislation and also human rights law. It does not deal with excluded matters such as waste, mineral extraction, or nationally significant infrastructure.

1.3 Implementation, Monitoring and Review

The Parish Council will use the neighbourhood plan as a basis for making representations on planning applications.

The Neighbourhood Plan will be reviewed every two years and revised as appropriate. If there are significant issues that arise and affect Brickhill Parish, then Brickhill Parish Council could bring forward the review of the plan.

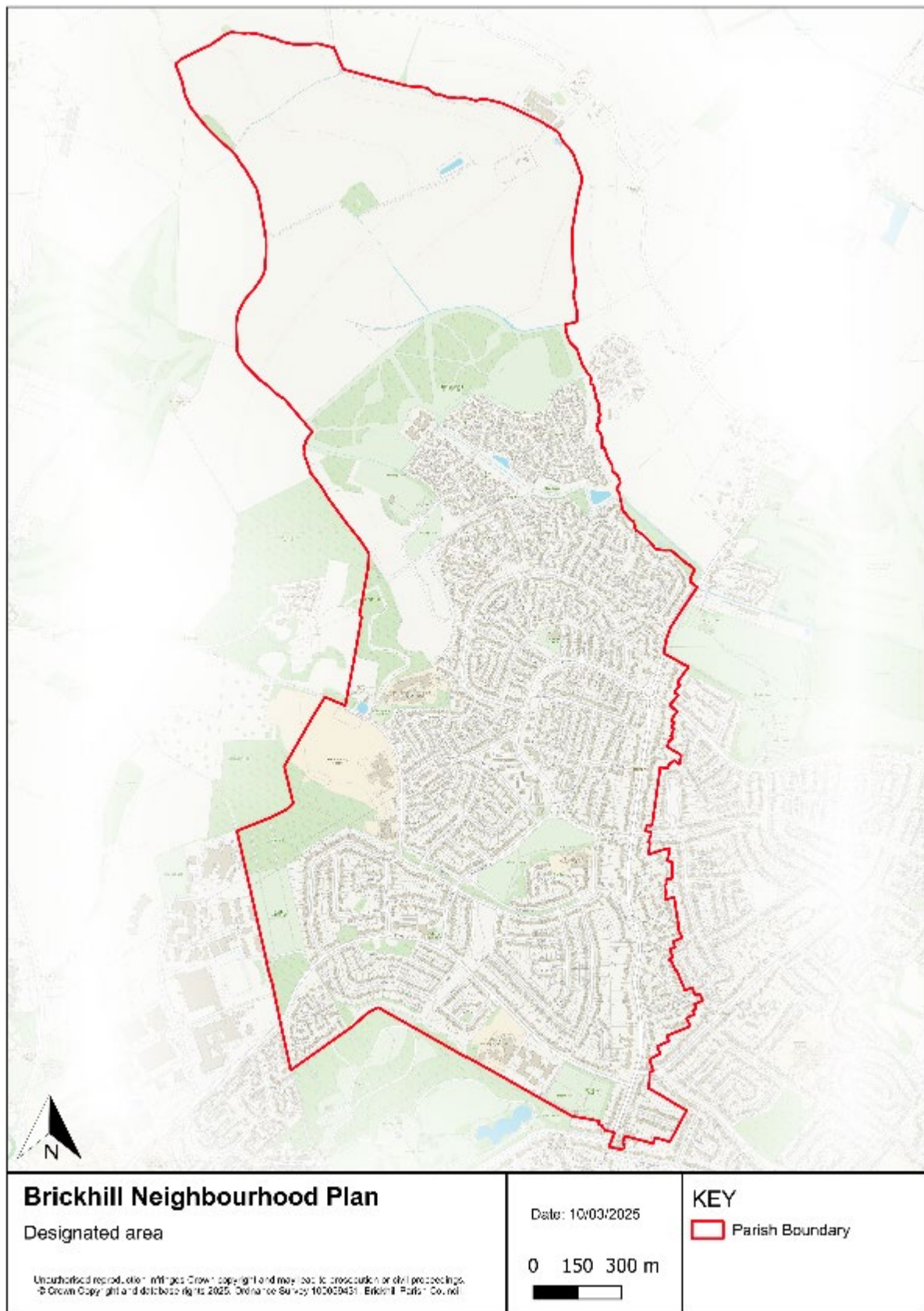


Figure 2: Brickhill Parish – Designated Neighbourhood Area

2. Aims of the Plan

2.1 A Vision for Brickhill

‘Brickhill will continue to be a place people want to live in, renowned for the quality of the environment and for the local facilities. Open spaces will be retained and improved for residents and nature. Sustainable forms of travel will be supported and enhanced. The housing needs of residents are considered if any developments occur.’

2.2 Planning Aims

- I. To enable sustainable and proportionate growth within Brickhill, to help create prosperity and meet the needs of the community.**
- II. To protect Brickhill’s environment and green spaces to support the health and well-being of current and future generations.**
- III. To ensure that development in Brickhill is well-designed, safe and sustainable.**
- IV. To support more sustainable live/work patterns and movement, including local food growing, walking, and cycling.**

2.3 Achieving the Aims

The aims underpin the policies and guidance in Chapters 5-9 of this Plan. The policies will be used in the development management process to inform decisions on planning applications.



Figure 3: Falcon Avenue - Local Green Space

3. Brickhill – Background

3.1 Development of Brickhill

Brickhill was formerly an area of farms and orchards, with just a scattering of houses along Kimbolton Road, and gatehouses for the Clapham Park convent. One of the farms was Brickhill Farm, from which Brickhill took its name.

Following World War II, momentum grew in Bedford to plan the growth of the town from a population of 58,000 to 75,000. Brickhill was chosen for large-scale housing development, construction starting in South Brickhill in 1959. North Brickhill was developed from 1966, finishing in the 1980s. As part of the development of Brickhill, schools, pubs, shops, churches, and other facilities were provided. A key feature of the planning of Brickhill was the creation of large areas of green open spaces.

The boundary of Brickhill to the north was also the town boundary. Beyond it lay agricultural fields. In 2002 permission was granted for a new development on the edge of Brickhill, in Ravensden parish. The Woodlands Park estate of 500 homes and the surrounding North Brickhill Country Park was built during the next 10 years. In 2015, following a Community Governance Review, the area became part of Brickhill parish, including farmland to the north and Highfield House, a Grade 2 listed property. A subsequent Community Governance Review resulted in the Ashmead Road football pitches, St Thomas More school and adjacent areas transferred from Clapham parish to Brickhill parish.

In May 2023 the government announced Route 1 as the planned route for East West Rail. It will pass through farmland in the northern part of Brickhill parish, close to Highfield House. As East West Rail is a Nationally Significant Infrastructure Project (NSIP), a formal decision on it will be made by Government outside the normal development plan/development management system. However, the Neighbourhood Plan will be a matter to be taken into account in a Local Impact Report which the planning authority has to prepare. The Secretary of State is obliged to have regard to any matters he considers are both important and relevant to the decision.

3.1 Strategic Context

Brickhill lies on the northern side of Bedford, with Bedford Midland railway station and Bedford town centre within 2km of the parish. The B660 from Bedford to Kimbolton runs north through the parish, while there is easy access to the A6 north to Rushden, the A421 east towards the A1 and the A428 west towards Milton Keynes and Northampton. Routes to the A6 south and towards the M1 south go via Bedford town. Bus services link Brickhill to the town centre and railway station, with other buses passing through Brickhill to Kimbolton in Cambridgeshire. Cycle and pedestrian routes are also used to connect to the town centre and other parts of Bedford.

3.2 Nature of the area

The older parts of Brickhill largely consist of housing estates, with many areas of green open spaces. The Avon Drive and Brickhill Drive shopping parades remain important focal points in the community. On the south-western edge of Brickhill lies the Victorian-era Bedford Park and also the Foster Hill Road cemetery; these connect to open spaces in Brickhill itself. On the north-western side of Brickhill are Brickhill allotments and the Park Wood Local Nature Reserve; these also connect to the areas of open space within Brickhill and to Clapham parish. The Woodlands Park estate, on the north of the previous urban area boundary, consists of 500 houses, and is surrounded by the North Brickhill Country Park and is adjacent to Clapham Park Wood, another nature reserve. To the north of the Country Park is arable land, up to the parish boundary.

Brickhill has evolved over the past sixty years. Some older parts have matured while the community as a whole has evolved as development has moved northwards. The early southern part from the Bedford Park boundary to Falcon Avenue and beyond could be distinguished as 'Old Brickhill' with its focus around the Brickhill Drive shopping precinct and the pond area opposite together with the earlier parts of the estate often referred to as the Birds. Other areas of Brickhill also have distinctive identities, such as around Waveney Green, leading on to North Brickhill and Woodlands Park.

3.3 Population

The 2021 census provides insights into the current population of Brickhill.

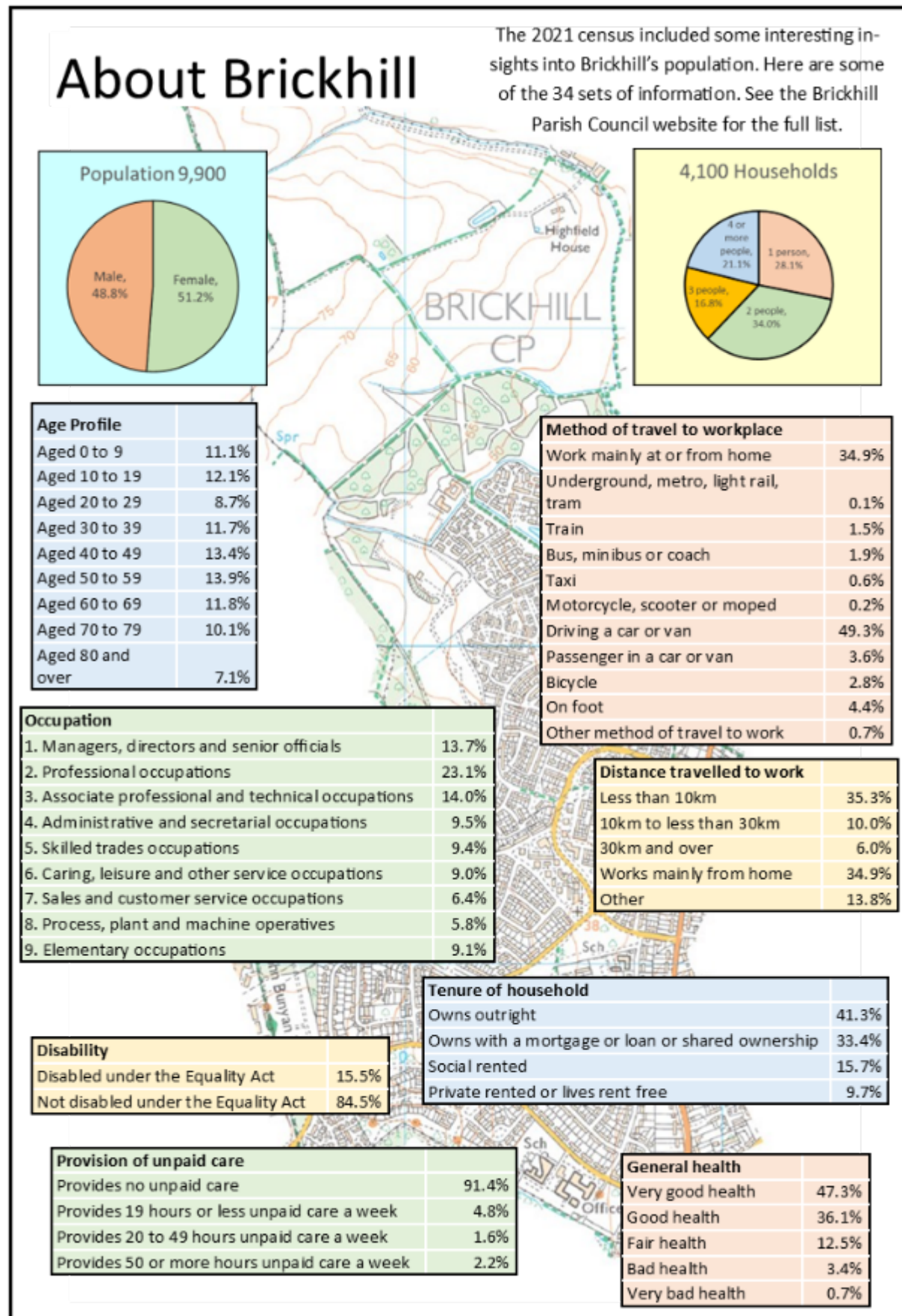


Figure 4: Brickhill 2021 census highlights

4. Community Engagement

4.1 Engagement Activities

Initially, residents were informed about the intention to create a Neighbourhood Plan in February 2020 through the 'Brickhill News', the parish council newsletter. Residents were invited to a public meeting to find out about Neighbourhood Plans and then asked for their views via an online survey. In 2023 residents were asked for their views about which sites could be identified as Local Green Space. Residents were informed via two editions of the parish council's 'Brickhill News' newsletter and were asked to take part in a questionnaire. In addition, a drop-in session was held in September 2023.



Figure 5: Article in 'Brickhill News', August 2023

4.2 Issues Identified

In the online survey, residents said that they liked:

- the green open spaces,
- the access to the countryside,
- the community feel,
- having access to the town,
- the local shops in Brickhill Drive and Avon Drive,
- local schools and parks.

Concerns were raised about:

- traffic volumes and speed,
- anti-social behaviour and crime,
- air and noise pollution,
- overdevelopment,
- the need to preserve Brickhill's green open spaces.

The comments received have informed the policies of this plan, which are grouped under the following headings:

- Sustainable Growth
- Local Environment
- Sustainable Design
- Transport and Paths



Figure 6: Robin Hill - Local Green Space

5. Sustainable Development

Purpose

To ensure that any development in Brickhill is sustainable and proportionate, to help create prosperity and meet the needs of the community.

Rationale and Evidence

The National Planning Policy Framework December 2024 (NPPF) provides a framework within which locally-prepared plans for housing and other development can be produced. Chapter 5 of the NPPF deals with the supply of homes, mix and affordability. Chapter 6 of the NPPF deals with building a strong, competitive economy and the need to create conditions for businesses to invest, expand and adapt. Chapter 8: Promoting healthy and safe communities.

The adopted Local Plan for Bedford Borough is 'Bedford Borough Local Plan 2030' (Bedford Borough Council, 2020). The new Local Plan 2040 is as of March 2025 under examination. Local Plan 2030 identified no sites for housing development in Brickhill Parish. It is therefore unlikely that any large developments will take place within Brickhill while the Local Plan 2030 is in effect. There may be small infill developments such as has taken place in former BPHA garage blocks off Mallard Hill and Brickhill Drive, or the replacement of dwellings such as has happened in Kimbolton Road.

Policies 59S and 60 in the Bedford Borough Local Plan 2030 set out criteria for considering housing mix in large scale and specialist developments. Policies 71, 81 and 83 in the local plan identify how employment and retail development will be considered at a local level. Policy 94 covers the provision of high-speed broadband to both employment and residential development.

The Bedford Strategic Housing Market Assessment produced for the Local Plan 2030 (Opinion Research Services, August 2018) and the Bedford Borough Local Housing Needs Assessments produced for the Local Plan 2040 (Opinion Research Services, May 2021) identified the need for housing for older people. The 2011 census showed that Brickhill ward had a higher proportion of older people than other wards of Bedford Borough (Older Persons' Accommodation Strategy 2018-2023, Bedford Borough Council). 29% of the population of Brickhill parish was 60 years old or older in the 2021 census.

Providing suitable accommodation for older people would provide enable older people to downsize and free-up larger properties which are more suitable for families, therefore making an efficient use of current housing stock.

A mix of 1 and particularly 2 bed homes would help cater for the needs of the older population, in the form of bungalows, built to mobility homes standards, possibly

flatted maisonettes and other mainstream housing. As well as various house types, a good housing mix should also incorporate various housing tenure options such as outright purchased properties, shared ownership, and other available options. However, there has been a noticeable loss of bungalows in Brickhill, due to them being converted into two storey family homes.

For a community to thrive it needs a mix of services and amenities which residents can use and benefit from. Not everyone has a car and having local shops enables a more sustainable lifestyle. Other facilities in the community, such as schools, sheltered accommodation, churches, community centres and the various groups and organisations that use them all add to the vitality of Brickhill.

Brickhill used to have a GP surgery, which community engagement suggests is greatly missed. There is no dental practice in Brickhill. Providing these services locally would be welcomed by many residents.

Brickhill does not have a large employment base, although the COVID-19 pandemic has led to more people working from home. Many home workers rely on having reliable high-speed internet connections. The existing local employment and retail centres should be protected as these provide jobs and services which are accessible at a very local level.



Figure 7: Brickhill Community Centre

BR-SG1: Local Employment

- 1. Development to create office and other work-space in Use Class E(g) will be supported on brownfield sites and expansion or redevelopment of existing commercial premises, subject to there being no significant adverse impacts on the amenities of local residents.**
- 2. Employment sites and premises should remain in employment use, unless it can be demonstrated that such use is no longer viable.**

Interpretation:

The policy supports employment in Use Class E. It does not relate to B2, B8 or other employment Use Classes. The local planning authority may choose to impose planning conditions on planning permissions where a change of use to Use Class E(g) is accepted, but change of use other uses in Class E, such as retail, could be harmful and contrary to other national and local policies.

Demonstrating that an employment use is no longer viable would normally involve making meaningful efforts to market the facility for sale or rental, at a realistic price, for a period of at least 12 months.

BR-SG2: Local Facilities

- 1. New community facilities will be supported in the following locations, subject to there being no significant adverse impacts on the amenities of local residents:**
 - a. in the Brickhill Drive neighbourhood centre;**
 - b. in the Avon Drive neighbourhood centre;**
 - c. the expansion or diversification of existing community facilities.**
- 2. Ground floor units used for retail or other community uses should remain in uses open to the public where possible and shopfronts should be retained.**

Interpretation:

The policy supports seeks to protect and support shops and other community facilities in and around the neighbourhood centres. This includes Use Class E, F1 and F2 facilities. The policy would support new health facilities.

Policy 99 of the Local Plan 2030 deals with the loss of existing community facilities.

The maps below illustrate the areas of the two neighbourhood centres.

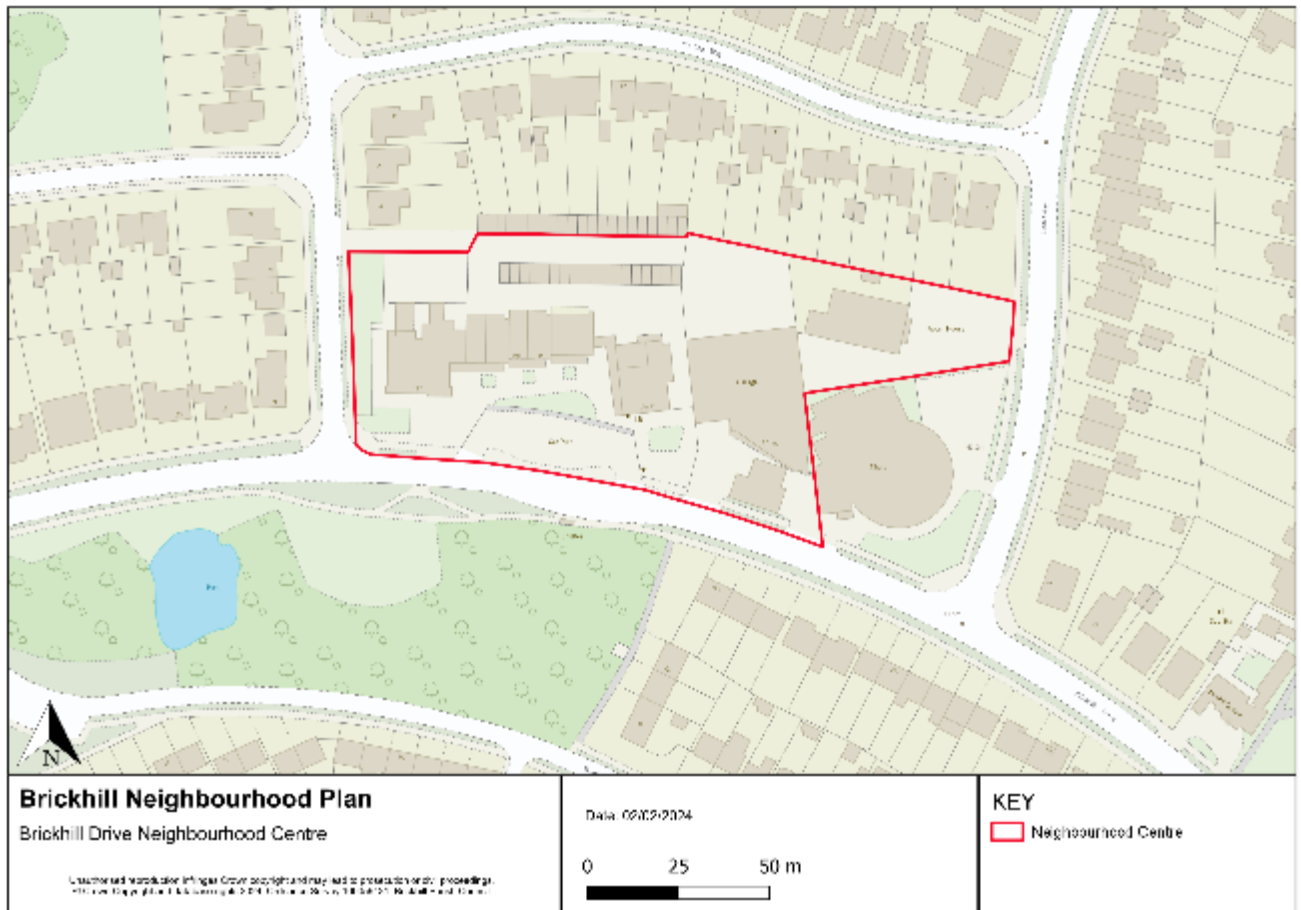


Figure 8: Brickhill Drive shops area



Figure 9: Brickhill Drive shops

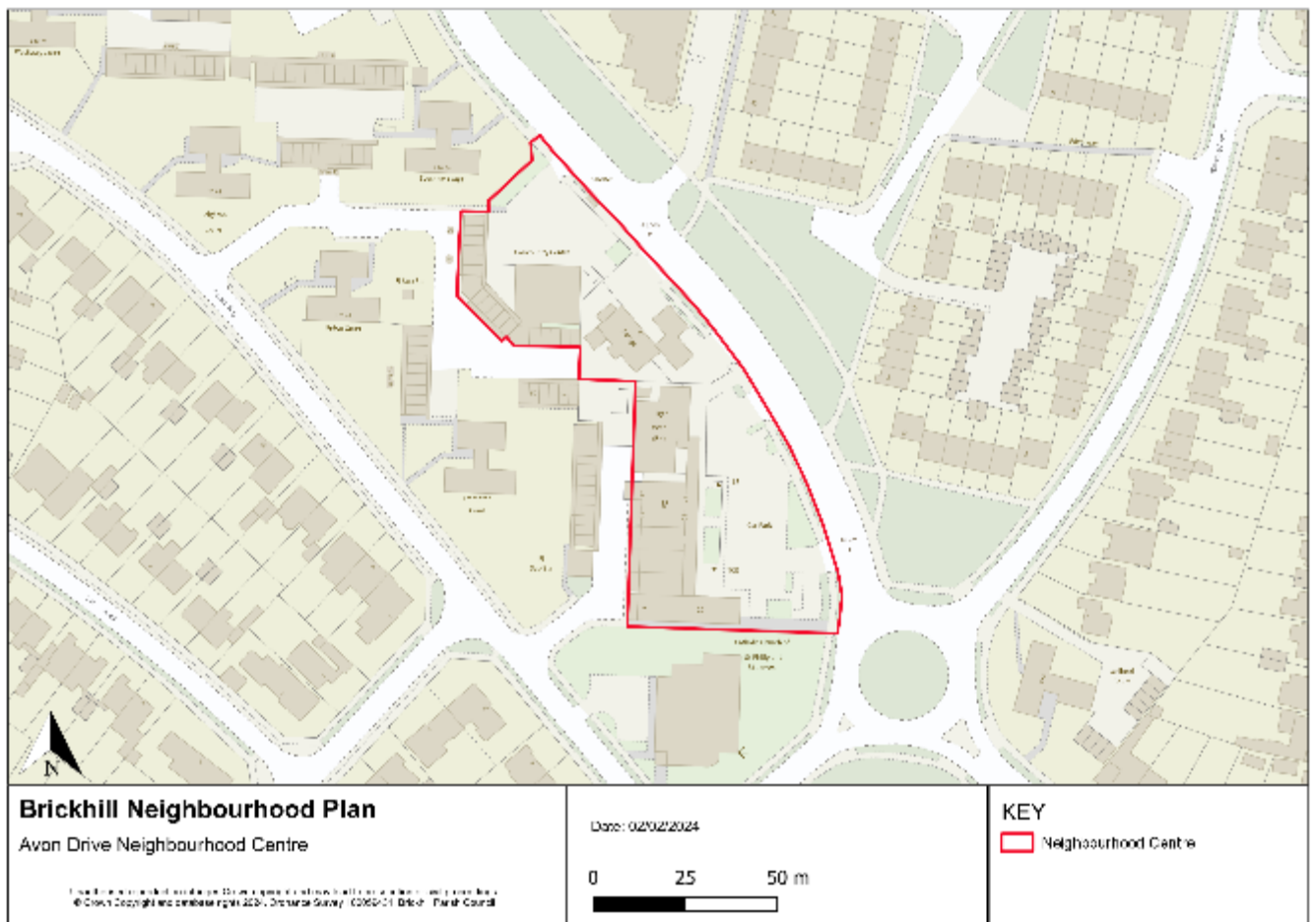


Figure 10: Avon Drive shops area



Figure 11: Avon Drive shops

BR-SG3: Residential Development

1. Residential development will be supported in the following locations:
 - a. infill development in gaps within existing built frontages;
 - b. redevelopment of existing residential properties.
 - c. redevelopment of garage courts, where they are no longer required.
2. Residential development should meet the needs of the parish, based on the latest evidence of housing need, including the need for smaller housing (1-2 bedrooms) housing suitable for the elderly, and multi-generational living.
3. Development should retain and not lead to the loss of single storey housing and other housing suitable for the elderly.
4. Residential development should include screened storage space for refuse bins and recycling bins.

Interpretation

The policy supports smaller housing and housing suitable for the elderly.

Housing needs evidence could include specific evidence commissioned or prepared by the Parish Council or the local planning authority, for example to support a new Local Plan.

A Neighbourhood Plan may not apply national housing standards on room sizes, but attention is drawn to *Technical housing standards – nationally described space standard 2015*.

Bin storage areas are required to be screened from view. Locating the bin store in a discreet location away from road frontages would be helpful in complying with the policy.

The Neighbourhood Area has been identified as being of 'serious water stress' and developers are **strongly** advised to have discussions with Anglian Water Services at an early stage are suggested.

6. Local Environment

Purpose

To protect Brickhill's environment and green spaces to support the health and well-being of current and future generations.

Rationale and Evidence

Chapter 15 of the National Planning Policy Framework deals with conserving and enhancing the natural environment. This includes protecting or enhancing protected landscapes, the character of the countryside and biodiversity.

Policies 28S, 29 and 30 of the Local Plan 2030 requires that all new development should be of a high design quality, contribute to the area's character and identity and respect the context within which it will sit. It provides for the protection, and where appropriate enhancement, of heritage assets and their settings, so that development integrates with the historic environment and character.

Local Plan policy 35S seeks to protect and enhance existing green infrastructure for the future benefit of the environment, people, and the economy. Policy 41S sets out how the historic environment and heritage assets will be considered and protected. Policies 42S and 43 identify how biodiversity in Bedford borough will be protected and enhanced. Policy 45 gives protection to those Local Green Spaces identified in the Bedford Local Plan.

Brickhill is fortunate to have many open green spaces. It is a noticeable feature of the area and many people choose to live in Brickhill because of its pleasant, open, aspects. An aim of this Neighbourhood Plan is to increase the protection of these public open spaces.

The North Brickhill Country Park has a heavy foot fall, with sport, dog walkers, walkers and families choosing to picnic on this area. The area is home to many deer, badgers, foxes and birdlife.

Protecting green spaces ensures that natural habitats remain intact, allowing biodiversity to thrive and contributing to the overall health of our environment. In addition, they offer invaluable recreational opportunities for residents of all ages. They are peaceful retreats where individuals can engage in physical activity. Access to green spaces has been linked to numerous physical and mental health benefits, including stress reduction, improved mood, and enhanced well-being. Green spaces, trees and vegetation help in mitigating the impacts of climate change, acting as natural carbon sinks. Green spaces and infrastructure play a vital role in enhancing the aesthetic appeal of our neighbourhoods and fostering a sense of pride and

identity within our community. These areas serve as green lungs within urban environments, contributing to the overall quality of life for residents.

Three important open green spaces were designated as Local Green Spaces (LGS) in the Bedford Borough Local Plan 2030: Waveney Green, North Brickhill County Park and Clapham Park Wood. The Clapham Park Wood site lies mostly in the parish of Clapham but is also partly in Brickhill Parish; it consists of historic woodland in Clapham parish and a more recent extension in Brickhill parish. In this Neighbourhood Plan an additional seven areas are designated as LGS. Reasons for the designation of the additional areas are included in Evidence Report for Local Green Spaces Version 1 (Brickhill Parish Council, March 2024), a separate document, along with the analyses of these spaces against the criteria (Paragraphs 106 and 107 of the NPPF December 2024).

National policy makes clear that LGS have similar protection to Green Belts. However, it should be noted that the purpose of LGS is to recognise and protect special community value, so is different to the five purposes for Green Belts.

St Philip and St James Church is designed by Burles Newton and Partner and opened in 1967. It has a Liturgical layout (square plan), bare brick internal walls (truth to materials), timber undulating ceiling and clerestory windows, and timber benches (Taking Stock, n.d.). There are two other churches: St Mark's (Church of England) whose first church/community building opened in 1977, and All Nations Church (formerly Brickhill Baptist Church) which moved to its Brickhill Drive site in 1965 from the town centre.

Clapham Park is a large Grade 2 house in Clapham parish. Built in 1872 for James Howard, the Liberal M.P. for Bedford. In addition to substantial grounds there were three lodges, located at entrances to the estate. One is in Clapham parish and is a Grade 2 listed building. The other two are in Brickhill at 228 Kimbolton Road and 2 Hawk Drive. All three were designed by the John Usher of Bedford (British Listed Buildings, n.d.; Bedfordshire Archives, n.d.). One of the lanes giving access to Clapham Park followed the line of the current path through the middle of what is now Falcon Avenue and Hawk Drive. Known locally as 'bumpy lane' it continues to Clapham along Carriage Drive.

In 2006-7, prior to the creation of the North Brickhill Country Park and the Woodlands Park estate, archaeological excavations found 'an area of dispersed prehistoric activity'. The decision was made to preserve the deposits in site, excluding the area from development and placing a cap of material over them. This area in question is referred to as 'Archaeological Zone 3' and is shown on Figure 14. See document 'Land at North Brickhill Bedford Bedfordshire, Scheme for Archaeological Resource Management' (Albion Archaeology, n.d.) for more information.



Figure 12: Former Clapham Park lodge, 228 Kimbolton Road, photographed in 1889

Brickhill Parish Council has 140 allotments at Foster's Brow. These are popular and there is a waiting list of residents awaiting vacant plots. Adjacent to the allotments is the community orchard that is part of the Park Wood Local Nature Reserve. The orchard holds many rare varieties that were grown by the Laxton family in their Bedford orchards.



Figure 13: Brickhill allotments

The Grade 2 agricultural fields in the northern part of the parish are arable, usually cereal or oil-seed rape. The Highfield Farm pig unit is immediately across the parish boundary, with some functions related to the unit taking place within Brickhill parish.

Policy 24 of the Local Plan 2030 led to permission for the construction of 165 dwellings off Graze Hill, Ravensden parish, plus an extension to the North Brickhill Country Park. There will be footpath and cycle links to the existing country park and to the Woodlands Park estate in Brickhill.

There are footpaths and bridleways linking Brickhill to the adjacent countryside. Retaining access to the countryside is important for the well-being of residents. Borough Local Plan 2030 Policy 91 addresses access to the countryside.

BR-LE1: Green Environment

1. Development should **seek to** have no significant harmful impact on the area's nature, ecology, trees and should achieve biodiversity net gain.
2. Development should avoid habitat damage where possible, or:
 - a. minimise habitat damage; and
 - b. take opportunities to restore damaged or lost habitat; or
 - c. as a last resort, compensate for habitat damage.
3. Development should **not avoid** harm and should take opportunities to enhance the green and open character, amenity, accessibility and recreational value of:
 - a. North Brickhill Country Park
 - b. Waveney Green
 - c. Park Wood local nature reserve
 - d. Brickhill Allotments
 - e. Clapham Park wood
 - f. other local parks.
4. Development should avoid **significant** harm to or loss of:
 - a. local community food growing areas, including the community orchard and allotments
 - b. the best and most versatile agricultural land **as defined in Defra's Agricultural Land Classification unless it can be proven that an individual site does not fall within Grades 1 or 2.**
5. **A Statement of Biodiversity Priorities and a Local Habitat Map is to be identified in Bedfordshire's Local Nature Recovery Strategy due to be published in December 2025. Opportunities to support the priorities set out in the Strategy should be taken wherever possible.**

Interpretation

Clause 3 of the policy could include development within the sites related to their use and conservation or development of adjacent or nearby sites.

Incorporating existing landscape features, trees, landform and green infrastructure into redevelopment is an important part of avoiding habitat damage and maintaining biodiversity.

Clause 3 could apply to development adjacent to or near to the spaces in question (which could affect their outlook, amenity and accessibility, for example). It could

also apply to development within the space, for example structures associated with the management or use of the Country Park.

Design features to support wildlife could include bat and bird boxes, wildlife connectivity via grass verges, footpath edges and gaps in fences, and use of wildflowers in landscaping.

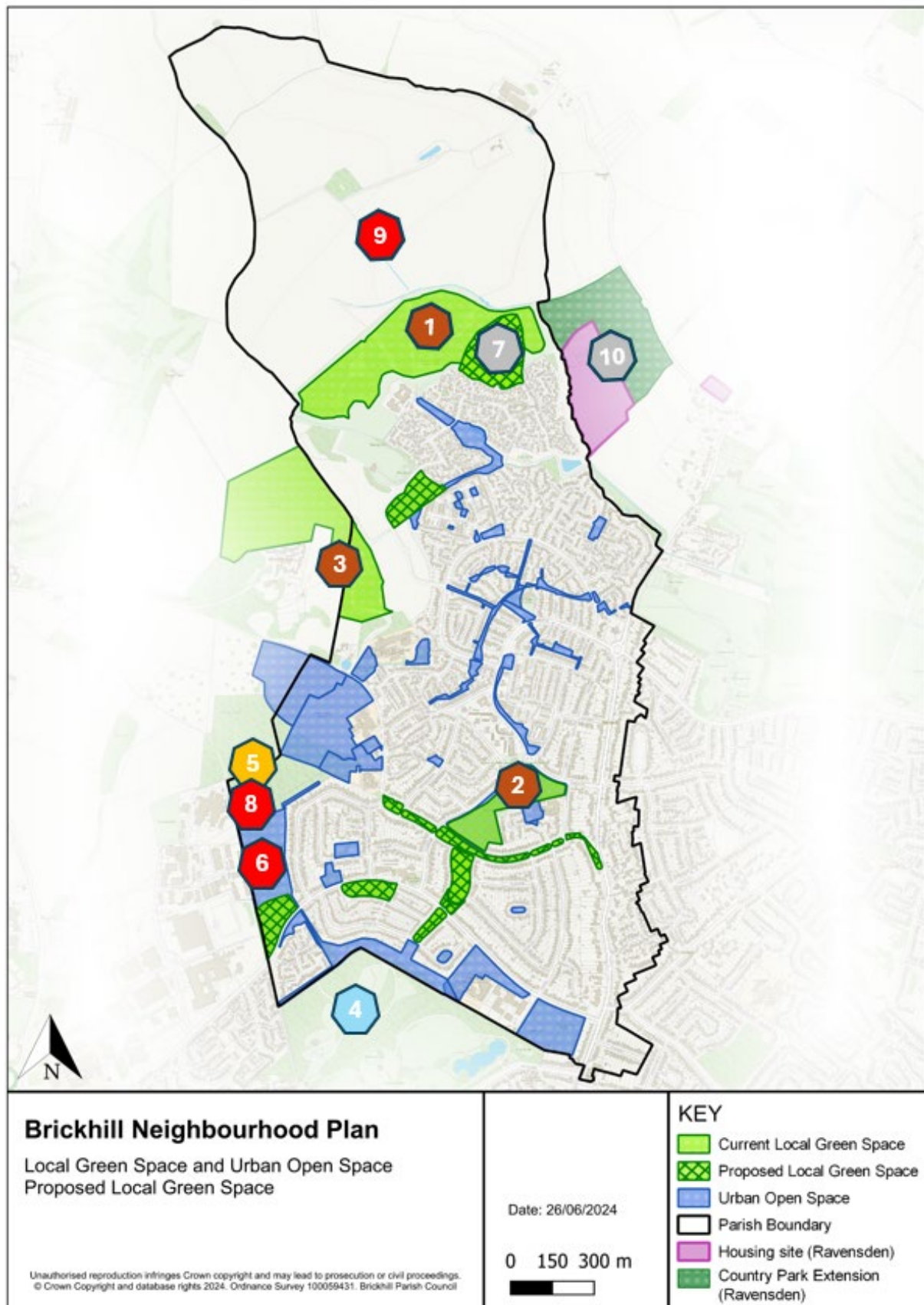


Figure 14: Key sites in and around Brickhill parish

Key	
	North Brickhill Country Park – existing Local Green Space
	Waveney Green – existing Local Green Space
	Clapham Park Wood, County Wildlife Site – existing Local Green Space
	Foster Hill Road cemetery, County Wildlife Site
	Park Wood Local Nature Reserve
	Brickhill allotments
	Archaeology site
	Community orchard
	Agricultural farmland
	Graze Hill development, Ravensden parish
	Urban Open Space
	Proposed additional Local Green Space

BR-LE2: Local Green Space

1. The following spaces are designated as Local Green Space:

- LGS1 – Falcon Avenue**
- LGS2 – Brickhill Drive (Pond Site)**
- LGS3 – Brickhill Drive/Foster’s Brow**
- LGS4 – Meadow off Crispin Drive**
- LGS5 – Robin Hill**
- LGS6 – Merlin Gardens**
- LGS7 – Carron Road kick-about space**

2. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

Interpretation

The plans below show each of the seven sites designated as Local Green Space.



Figure 15: LGS1 - Falcon Avenue

Brickhill Neighbourhood Plan



Figure 16: LCS2 - Brickhill Drive (pond site)

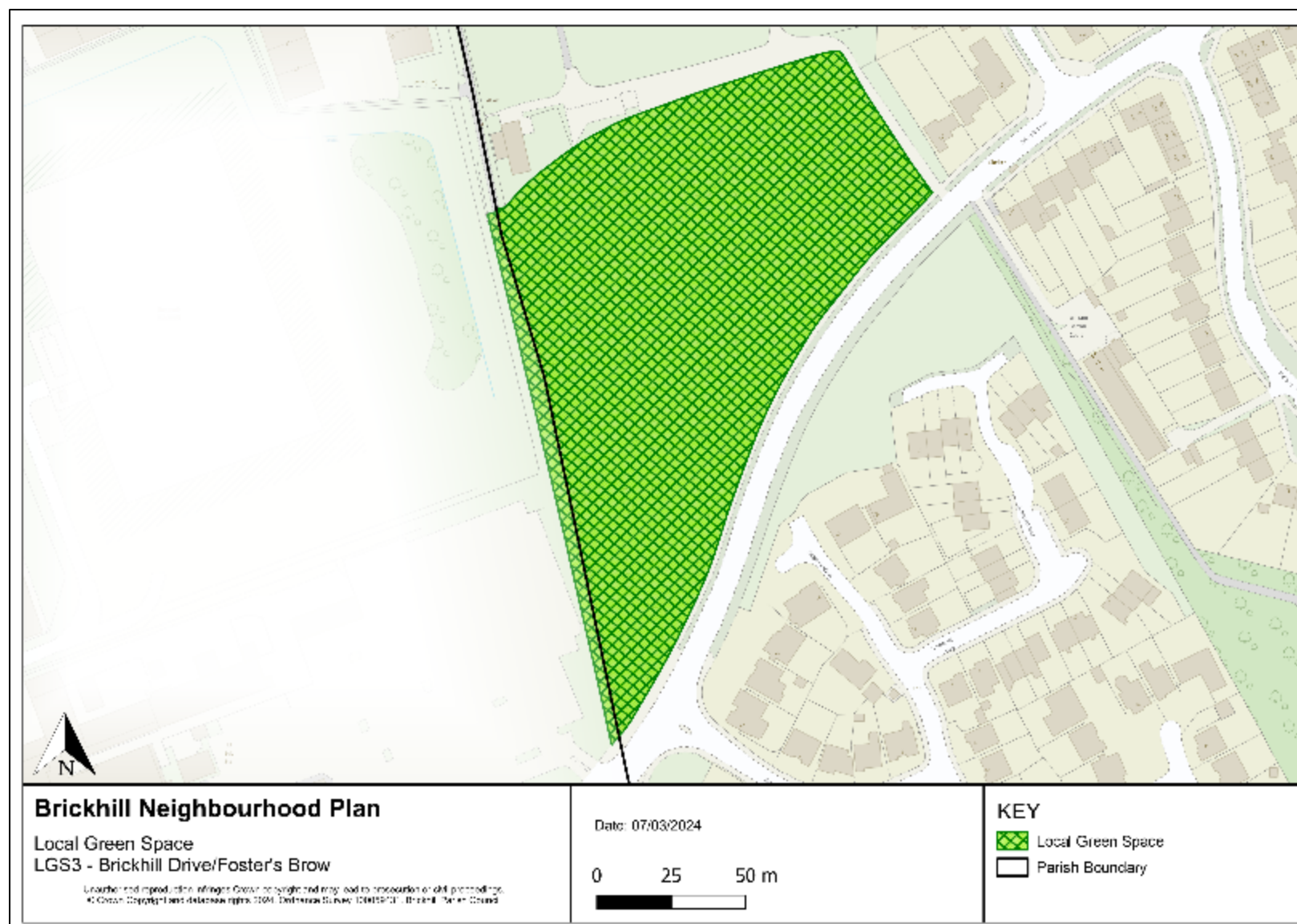


Figure 17: LGS3 - Brickhill Drive/Foster's Brow

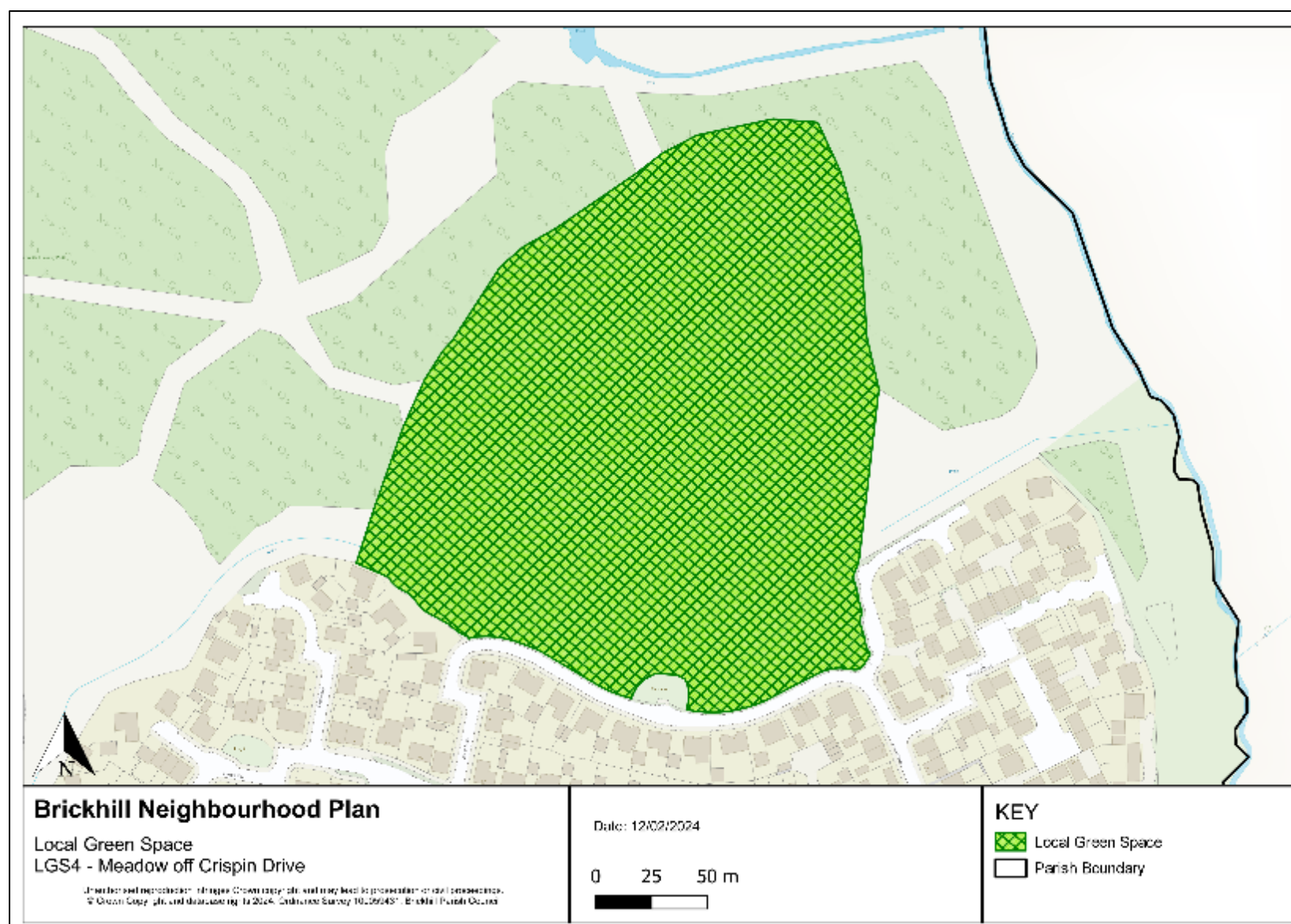


Figure 18 – LGS4 - Meadow off Crispin Drive



Figure 19 – LGS5 Robin Hill and LGS6 Merlin Gardens

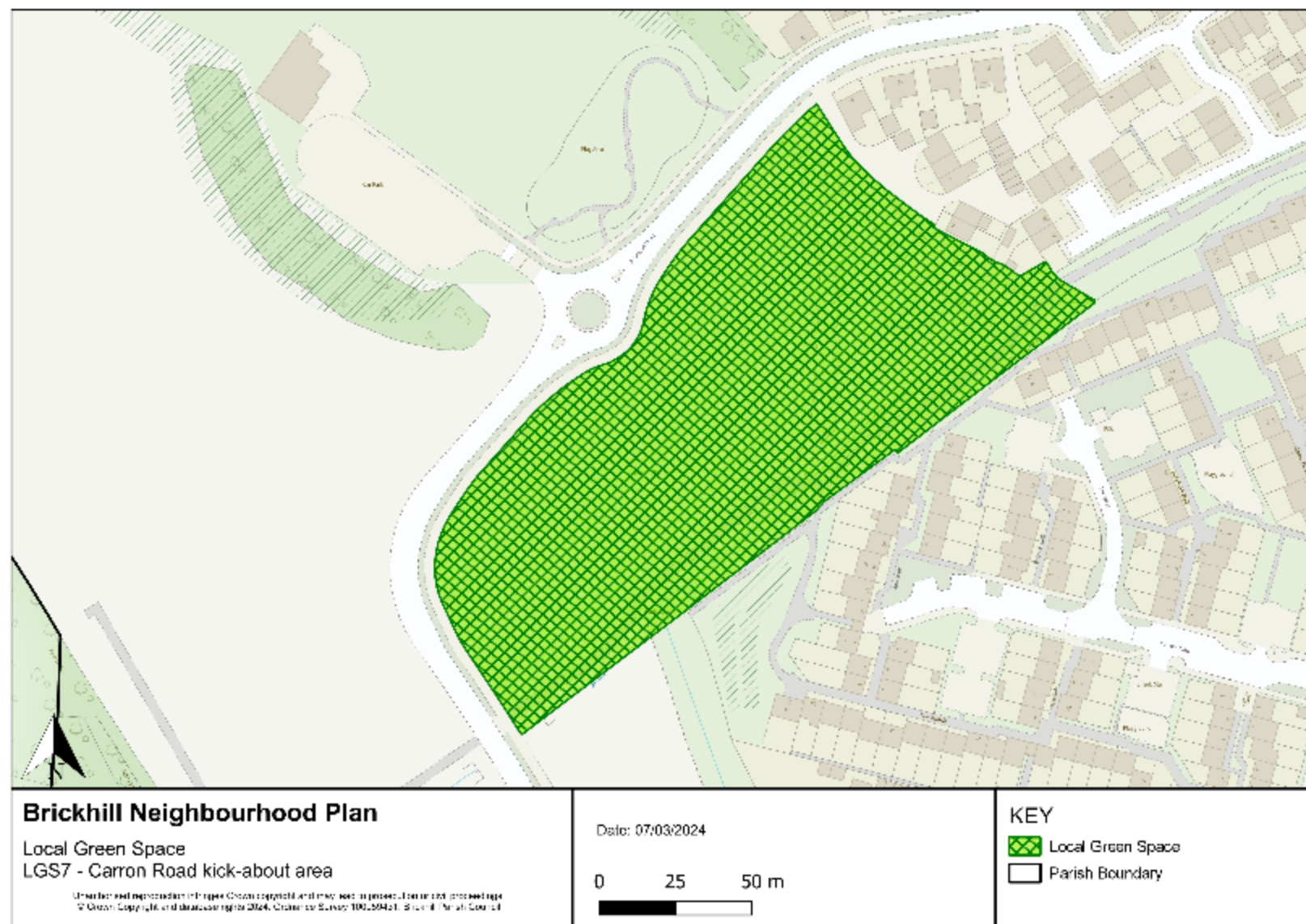


Figure 20 – LGS7 - Carron Road kick-about space

BR-LE3: Local Heritage

- 1. Development must not harm the route of the historic lane in Falcon Avenue, leading via Hawk Drive to Clapham Park House, including the avoidance of adverse impacts on trees and landscape features.**
- 2. Development should have no adverse impact on, and should take opportunities to enhance, the significance and settings of the following non-designated heritage assets:**
 - a. The two Clapham Park lodges in Brickhill at 228 Kimbolton Road and 2 Hawk Drive**
 - b. St Philip and St James Church.**
- 3. Development should take account of potential impacts on the archaeological remains within the North Brickhill Country Park.**

Interpretation

The policy identifies non-designated heritage assets, including a post-war church.

Highfield House, the only listed building in Brickhill Parish, is not addressed in the policy, but is already protected by national legislation, policy and guidance and Local Plan policy.

Applications for development impacting heritage assets should be accompanied by a professional heritage assessment.

The Clapham Park lodges and St Philip and St James Church are shown on Figure 21.

In complying with Clause 3, where archaeological remains may be affected by proposed development, their presence or absence should be assessed in accordance with the NPPF and Local Plan policy 41S, and where found to be present, they should be conserved or investigated in a manner appropriate to their significance.

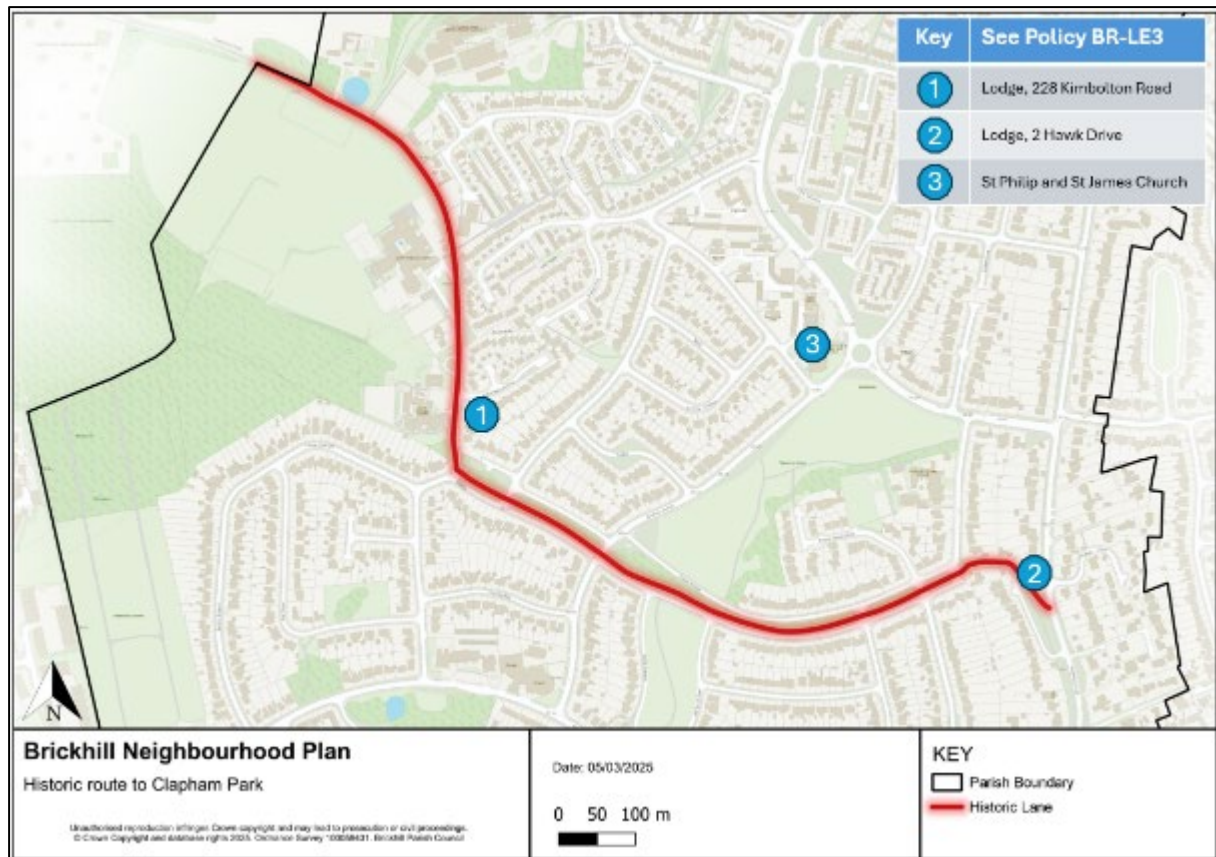


Figure 21: Historic lane leading to Clapham Park



Figure 22: St Philip and St James Church

7. Sustainable Design

Purpose

To ensure that development in Brickhill is well-designed, safe and sustainable.

Rationale and Evidence

The National Planning Policy Framework (NPPF) December 2024 identifies good design as a key aspect of sustainable development. Paragraph 131 highlights the importance of design as a key aspect of sustainable development. This is reinforced by the National Design Guide 2021.

The Department for Transport's Manual for Streets 1 and Manual for Streets 2 provide best practice guidance for street design within developments.

Policies 28S, 29 and 30 of the Local Plan 2030 requires that all new development should be of a high design quality, contribute to the area's character and identity and respect the context within which it will sit. Policy 29 also sets out requirements for the promotion of accessibility, public spaces, measures to effect community safety and the integration of functional needs including refuse and recycling storage and collection, and car and cycle parking. Policies 38 and 39 require developments to provide suitable landscaping and to protect existing trees.

Good design creates distinctive, functional and sustainable places for residents to live, work and enjoy. All development proposals will be expected to achieve a high standard of design and should be underpinned by a thorough analysis of the site and its surrounding area. New developments should be well integrated and positively related to their surroundings.

The Climate Change Act (2008) establishes a legally binding target to reduce the UK's greenhouse emissions by at least 80% in 2050 from 1990 levels. All new developments should optimise the potential for sustainable design. They should be located and designed to maximise the opportunity to travel by sustainable modes and should ensure appropriate consideration is given to orientation, landscaping, SUDS, energy, water use, and potential for pollution. Policy 51S of the Bedford Local Plan 2030 identifies a strategic approach for addressing climate change. Policies 52, 53 and 54 address issues covering water demand, development layout and energy efficiency.

A well-established standard for considering the design and sustainability of housing is 'Building for a Healthy Life' (Urban Design Group, 2020). This has informed the policies of this Neighbourhood Plan.

A coordinated approach should be taken to the use of materials and the design and siting of street furniture, boundary treatments, lighting, signage and public art, all of which contribute towards place making. Trees and other planting appropriate to the scale of development and space available should be incorporated in order to soften the streetscape and reduce the visual impact of car parking. It is important that the choice of landscaping and materials used within the public realm are durable and functional in order to accommodate both every day and infrequent uses, such as the movement of vehicles and people. Consideration must also be given to the cost, practicalities, and responsibilities for the maintenance of landscaping and materials in the long term.

The design of new developments is expected to address community safety concerns, for example by providing clear boundaries between public and private space and ensuring that the fronts of buildings and their principal entrances face onto the street or public space to increase pedestrian activity. Buildings and layouts should also be designed to maximise opportunities for natural surveillance and provide good quality lighting and sensible landscaping.

It is important that all new development is designed to be inclusive with the needs of all users considered from the outset. Special consideration should be given to the needs of people with disabilities.

See Bedford Borough Local Transport Plan 2021 (LTP3) and Local Plan 2030 section 9.2.2 Development Layout & Accessibility, policy 53 - Development layout and accessibility.

BR-SD1: Place and Context

- 1. Development should complement the local context in terms of the predominant scale, height, massing, set-back from the road, spacing of buildings and any pattern of front and rear gardens.**
- 2. Development should create safe environments, including by providing active frontages with doors and windows to overlook roads and spaces, to provide natural surveillance.**
- 3. Landscape design should be an integral part of design and layout of development, to create attractive and functional public spaces and garden spaces, whilst also meeting the requirements of the Green Environment Policy (BR-LE1).**
- 4. The design and layout of development should create an attractive and convenient environment for pedestrians and cyclists, linking to any surrounding paths.**
- 5. Development adjacent to or affecting public and green spaces should not harm their character, amenity, accessibility or community value.**

Interpretation

Compliance with the policy would require analysis of the local context, so that development can respond positively to key townscape and landscape characteristics. Development that fails to reflect key characteristics is unlikely to meet the requirements of the policy. Use of architects and other design professionals is encouraged.

Interpretation of 'predominant' in Clause 1 relates to the general townscape qualities in the area. For example, the presence of a taller landmark would not affect the 'predominant' height and scale of buildings.

Tokenistic planting of left-over bits of land would not create high quality landscape design, which should be an integral part of the design and layout of the scheme.

The National Design Guide 2021 and 'Building for a Healthy Life' standard may be useful in securing compliance with this and the next policy.

Bedfordshire Police have two Designing Out Crime Officers (DOCOs) and these could be a useful early contact for developers, especially around 'Secured by Design'.

BR-SD2: Green Design

- 1. Development should balance its carbon and other environmental impacts by incorporating positive green features in its design and landscaping, taking account of the Green Guidance Note in this Plan.**
- 2. Hard surfaces should be permeable to allow surface water to drain away.**
- 3. Materials should be of high quality and be durable, to complement the local context, and support will be given to the use of local materials, low-embodied-energy materials, or recycled materials.**
- 4. Innovative or creative green design solutions will be supported.**

Interpretation

Hard surfaces could include domestic drives and paths, parking and servicing areas and urban spaces.

The policy requires careful selection of materials, with reference to the local context and environmental considerations. The predominant local house building style is brick with plain clay tiles.

8. Transport and Movement

Purpose

To support more sustainable live/work patterns and movement, including walking and cycling.

Rationale and Evidence

The NPPF December 2024 sets an expectation that the design of developments should prioritise pedestrian and cycle movements, followed by access to high quality public transport (so far as possible) and to reflect the importance of creating well-designed places.

Policy 31 of the Bedford Borough Local Plan 2030 seeks to reduce the impact on access to the public highway and encourage the provision for access by public transport, cyclists and pedestrians. Policy 87 of the Local Plan requires new developments to contribute to the improvement of the public transport network from an early stage of the occupation of any development. Policies 88 and 89 require planning applications to demonstrate that the social and environmental impact of traffic has been considered and require the provision of electric charging points throughout Bedford Borough.

There is an existing network of cycle routes which link Brickhill to the town centre and other parts of the urban area. To encourage cycling, any developments should aim to make it easier and safer for residents to cycle by connecting to or improving existing routes.

There are also many footpaths in Brickhill and developments should be designed in the first instance to encourage residents to use the footpath network, for ease of access to shops, schools, work or leisure.

BR-TM1: Sustainable Transport

- 1. Development that is likely to generate additional journeys should be supported by balanced transport provision, including sustainable forms of transport and walking, proportionate to the scale and nature of the development.**
- 2. Parking should be designed as an integral part of design, layout and landscaping, so as not to dominate public streets and public spaces.**
- 3. Development should take opportunities to enhance pedestrian connectivity, including by providing safe, attractive and convenient links to surrounding public transport routes.**
- 4. Electric Charging points should be provided in convenient locations for parking areas in employment sites.**
- 5. Secure, covered storage for cycles and other personal vehicles should be provided for all development that creates new employment floorspace and all new dwellings.**

Interpretation

The policy should be applied in proportion to the scale and complexity of development.

Schemes that focus only on car provision are unlikely to meet the requirements of the policy.

The local planning authority has a Parking Standards Supplementary Planning Document.

BR-TM2: Rights of Way

- 1. Development should have no significant adverse impacts on footways, cycleways and bridleways including on their route, accessibility, amenity, safety and setting.**
- 2. Development should take opportunities to enhance or link to existing footpaths and cycleways.**

Interpretation

Development that encloses footpaths and prevented natural surveillance would be unlikely to meet the requirements of the policy.

9. Green Guidance Note

9.1 Purpose of this Guidance Note

This is a guidance note for developers on green design. It is an informal note, so includes non-planning matters. However, use of the guidance may help in achieving compliance with the policies of the neighbourhood plan, in particular those relating to design and landscape.

9.2 Planning Principles

Mixed-use neighbourhoods (which include residential properties, employment and community facilities in easy walking distance) can help to reduce the need for journeys. Such neighbourhood are sometimes referred to as '15 minute neighbourhoods'.

Layouts should prioritise pedestrian and cycle movement, convenience and safety. This includes convenient links to public transport.

Retention and reuse of buildings preserves the energy embodied in their materials and construction and avoids landfill.

Flexible work practices, including home working, can help to create more sustainable live/work patterns. Many meetings can be held through digital media.

Design of development should take account of microclimate, including sun, shading and wind.

Development should be designed to minimise pollution, including air, water and noise pollution.

9.3 Green Building Design

Carbon neutral development is a key goal. Ways of building green can include:

- use of efficient heating and cooling systems, or design to reduce dependency on heating and cooling systems
- superior insulation properties and airtightness
- natural ventilation and air flow (for warmer months) to help avoid over-heating
- use of local, low-embodied energy, recycled and recyclable materials
- living (green) walls or roofs
- orientation to maximise passive solar gain
- rainwater capture, storage, and reuse (grey water)

- use of LED or other low wattage lighting
- space for natural drying clothes
- bins for recycling
- flexible spaces and layouts to accommodate changing demands.

9.4 Biodiversity

Development should achieve a biodiversity net gain.

In terms of impacts on habitats, the following hierarchy should be used:

- Avoid habitat damage
- Minimise habitat damage
- Restore damaged or lost habitat
- Compensate for habitat loss or damage (as a last resort).

Existing landscape features, landform and green infrastructure should be retained and be incorporated into redevelopment and enhanced as far as possible.

Design features to support wildlife include:

- Bat boxes and bird boxes (owl, raptors, house sparrow, house martin, swift, woodpecker)
- Hedgehog gaps in fences
- Badger routes
- Wildlife connectivity via grass verges and footpath edges
- Meadow edge grasses and wildflowers, bee friendly desirable.

9.5 Public Realm and Green Landscape Design

The public realm and green infrastructure should be designed to support movement, recreation, social interaction, play and exercise.

Sustainable Urban Drainage Systems (SUDS) should be incorporated into the landscape design. This includes green spaces for residential developments.

Hard surfacing should be kept to a minimum area and be water permeable.

Use of traditional hedges for boundary treatments creates a greener environment and enhances the historic and rural character of the area.

Native species should be used in planting.

9.6 Green Energy

Local green energy schemes can include small wind turbines, ground heat pumps, photovoltaics, biomass and other technologies. There has to be awareness of the impact of such schemes on historic and rural character, so the location and design of such facilities needs careful consideration.

10. Acknowledgements and contact details

Brickhill Parish Council thanks the various organisations and individuals who have contributed to the Neighbourhood Plan:

- The councillors and residents who have been part of the working group.
- Residents who have sent in their views as part of the questionnaires or who have attended meetings.
- Dave Chetwyn of Urban Vision Enterprise for his professional support.
- Jackie Ulliyett of the Bedfordshire and Luton Biodiversity Recording and Monitoring Centre (BRMC) for the creation of detailed maps included in this document.
- Sonia Gallaher, Senior Planner at Bedford Borough Council, for answering queries and providing advice.
- The officers at the Environment Agency, English Heritage and Natural England for responding to the screening document.

For any queries, please contact:

Brickhill Parish Council,
St Mark's Church Community Centre,
Calder Rise,
Brickhill,
Bedford MK41 7UY

Email: clerk@brickhillparishcouncil.gov.uk
<https://brickhillparishcouncil.gov.uk>

Document details
Brickhill NP March 2025 V3.6.docx

Appendix A: Supporting Documents

These are the documents referred to in the Neighbourhood Plan version 3.6. A separate document with current URLs for each document will be submitted with the Neighbourhood Plan and available on the Brickhill Parish Council website, www.brickhillparishcouncil.gov.uk.

Albion Archaeology (2004), 'Land at North Brickhill Bedford Bedfordshire, Scheme for Archaeological Resource Management', 5th May 2004.

Bedford Borough Council (2018), 'Housing Sites Trajectory, September 2018'.

Bedford Borough Council (2020), 'Local Plan 2030, Planning for the future'.

Bedford Borough Council (2021) 'Bedford Borough Local Transport Plan 2021 (LTP3)'.

Bedford Borough Council (n.d.), 'Older Persons' Accommodation Strategy 2018-2023'.

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Brickhill Parish Council (2024), 'Evidence Report for Local Green Spaces Version 1'.

Brickhill Parish Council (2024), 'Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report, Brickhill Neighbourhood Plan.

British Listed Buildings (n.d.), 'Clapham Park House'.

Opinion Research Services (2018), 'Bedford Strategic Housing Market Assessment Update 2016, Report of Findings and Addendum Report, August 2018'. Borough Local Housing Needs Assessment, Report of Findings'. Produced for Bedford Borough Council. It is listed as a Supporting Document for Local Plan 2030.

Opinion Research Services (2021), 'Bedford Borough Local Housing Needs Assessment, Report of Findings'. Produced for Bedford Borough Council. It is listed as a Supporting Document for Local Plan 2040.

Taking Stock (n.d.), 'Bedford – St Philip and St James'.

Urban Design Group (2020), 'Building for a Healthy Life'.



Bedford Borough Council Brickhill 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 to each of the recommendations contained within the independent examination report of the Brickhill Neighbourhood Plan (“the Plan”) by independent examiner Wendy Burden, which was received by the Bedford Borough Council on 30 October 2025.

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

BACKGROUND

Under the Town and Country Planning Act 1990 (as amended), Bedford Borough 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 Brickhill Neighbourhood Plan may now be submitted to referendum.

The Brickhill Neighbourhood Plan relates to the area that was designated by Bedford Borough Council as a Neighbourhood Area on 8 September 2016. This area is coterminous with the boundary of the parish of Brickhill and is entirely within the Local Planning Authority's area.

Between 8 April 2024 to 30 May 2024, Brickhill Parish Council undertook consultation on the draft Plan in accordance with Regulation 14.

Following the submission of the Brickhill Neighbourhood Plan to Bedford Borough Council on 10 March 2025, Bedford Borough Council publicised the draft Plan for a six-week period and representations were invited in accordance with Regulation 16. This consultation took place between 6 May – 20 June 2025.

INDEPENDENT EXAMINATION

Bedford Borough Council appointed Wendy Burden, with the agreement of Brickhill Parish Council, to undertake the independent examination of the Brickhill 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 13 August 2025.

The examiner's report was formally received by Bedford Borough Council on 30 October 2025. 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 Brickhill parish.

Following receipt of the examiner's report, legislation requires that Bedford Borough Council considers each of the modifications recommended, the reasons for them, and decides what action to take. Bedford Borough 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, Bedford Borough Council has decided to accept all of the examiner's recommended modifications to the draft Plan. These are set out in Table 1 below.

Bedford Borough Council considers that, subject to the modifications being made to the Plan as set out in Table 1 below, the Brickhill 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. Bedford Borough Council has considered this recommendation and the reasons for it, and has decided to accept it. The referendum area for the final Brickhill Neighbourhood Plan will therefore be based on the designated Brickhill Parish Neighbourhood Area.

These decisions were made by the Portfolio Holder for Economic Growth, Planning and Prosperity on behalf of the Bedford Borough Council's Executive on **date???**.

As a consequence of the required modifications, Bedford Borough Council will alter the Brickhill 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 shortly once a date is set by Bedford Borough Council.

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

Proposed Modification Number	Brickhill Neighbourhood Plan Reference	Examiner's Report Reference	Recommended Modification and Reason	Bedford Borough Council Decision/reasoning
PM1	Page 24 Policy BR-LE1	Para 4.21	<p>Clause 1: after "should", insert "seek to".</p> <p>Clause 3: after "should", delete "not" and insert "avoid".</p> <p>Clause 4: after "avoid", insert "significant".</p> <p>Clause 4b: add: "as defined in Defra's Agricultural Land Classification unless it can be proven that an individual site does not fall within Grades 1 or 2." Reason: In the interests of clarity and to avoid being over prescriptive.</p> <p>Add new Clause 5: "A Statement of Biodiversity Priorities and a Local Habitat Map is to be identified in Bedfordshire's Local Nature Recovery Plan due to be published in December 2025. Opportunities to support the priorities set out in the Strategy should be taken wherever possible. Reason: To provide guidance as to how clause 1 might be achieved.</p>	Agree with the modification for the reasons set out in the examiner's report.
PM2	Page 27 Policy BR-LE2	Para 4.23	<p>Add under the list of designated Local Green Space a new clause: "Policies for managing development within a Local Green Space should be consistent with those for Green Belts." Reason:</p>	Agree with the modification for the reasons set out in the examiner's report.