

# INDEPENDENT EXAMINATION OF THE RAVENS DEN NEIGHBOURHOOD PLAN

EXAMINER: Wendy Burden BA (Hons) DipTP MRTPI

Steve Arnold  
Chair of the Neighbourhood Plan Steering Group

Sonia Gallaher  
Bedford Borough Council

Examination Ref:01/WB/RNP

7 September 2022

Dear Mr Arnold and Ms Gallaher

## RAVENS DEN NEIGHBOURHOOD PLAN EXAMINATION

Following the submission of the Ravensden Neighbourhood Plan (the Plan/RNP) for examination, I would like to deal with some initial procedural matters for the submitted RNP. I also have some questions for Ravensden Parish Council (RPC). I would further welcome any comments on the questions from Bedford Borough Council (BBC). I would like to receive written responses **by Friday 30 September**, if possible.

### 1. Examination Documentation

I can confirm that I have received the submission of the Plan and all the accompanying documentation, including the Basic Conditions Statement; the Consultation Statement; the Strategic Environmental Assessment Screening Report; the Habitats Regulations Assessment; the Housing Needs Survey; the Green Infrastructure Plan; and the Regulation 16 representations, to enable me to undertake the examination. I received the full set of documents on 5 September 2022.

Subject to my detailed assessment of the Plan and any proposed modifications, I have not at this initial stage identified any significant and obvious flaws that might lead me to advise that the examination should not proceed.

### 2. Site Visit

I intent to carry out a site visit to the neighbourhood plan area and the IPe office will advise on timing in due course. The site visit will assist in my assessment of the draft Plan, including the issues identified in the representations.

The visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

I have some matters to raise at this stage which I set out below. I may also potentially have additional questions following my site visit, which if I need to raise I will set out in writing separately.

### 3. Written Representations

Under paragraph 9(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) the general rule is that the examination should take the form of the consideration of written representations. At this stage I consider the examination can be conducted solely by means of the

written representations, without the need for a hearing. Nevertheless, I will reserve the option to convene a hearing should a matter or matters come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

#### 4. Further Clarification

From my initial assessment of the Plan and supporting documents, I have identified a number of matters where I require some additional information from RPC.

I have six questions seeking further clarification and information, which I have set out in the Annex to this letter. I would be grateful if you can seek to provide a written response **by Friday 30 September 2022** although an earlier response would be much appreciated.

#### 5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within 4-6 weeks of submission of the draft Plan.

However, I must provide you with an opportunity to reply to the matters raised above, and in the event that I have any supplementary questions seeking clarification as a result of my site visit, I must also provide the opportunity for you to reply further. This means that the examination timetable will be extended. Please be assured that I will seek to mitigate any delay as far as is practicable. The IPe office team will update you shortly on the scheduling of the site visit and, in due course, the anticipated delivery date of the draft report.

If you have any process questions related to the conduct of the examination which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter is placed on both the Parish Council and Borough Council websites.

Thank you in advance for your assistance.

Your sincerely

*Wendy Burden*

Examiner

## ANNEX

From my initial reading of the Ravensden Neighbourhood Plan and the supporting evidence, I have the following questions for RPC, though I would also welcome any comments on the questions from BBC. I have requested the submission of responses **by Friday 30 September 2022**. All of the points set out below flow from the requirement to satisfy the Basic Conditions.

- 1** Policy RNP1: the preamble to the policy in paragraph 5.4 states that there is an absence of a specific policy for Cleat Hill/Mowsbury. However, the area is covered by Bedford Local Plan (BLP) Policy 75. Whilst this is a widely based policy, there is no indication within the policies of the BLP that further policy provision is required. The designation of Cleat Hill/Mowsbury as a Special Policy Area introduces a designation which has no foundation within National or Development Plan policy. Neighbourhood planning groups can play an important role in identifying the special qualities of an area and explaining how this should be reflected in development. Does the Parish Council wish to put forward amendments to Policy RNP1 which remove the designation as a Special Policy Area but identify the special qualities and features of the Cleat Hill/Mowsbury area the Council seeks to maintain? Any criteria should be locally specific and in accord with Policy 75 of the BLP.
- 2** Policy RNP2: a number of the criteria in this Policy are covered by the policies of the BLP such as Policies 24, 47S, and 93, and by the BBC adopted Car Parking standards. Can the RPC identify those criteria which it considers to be of local significance which would not be encompassed within the BLP policies?
- 3** Policy RNP4: this policy includes requirements which would normally be imposed following detailed assessment through a planning application. Can the RPC provide me with further clarification around the detailed justification for criteria in bullet points 1, 2, 5, and 9?
- 4** Policy RNP5: a comprehensive set of design codes has been submitted with the RNP as Appendix 3. Is there any matter listed in RNP5 which is not covered by Appendix 3 or the policies of the BLP and which is of local significance?
- 5** Policy RNP7: Heritage Assets are subject to a range of statutory controls as well as national and development plan policies. Does this Policy add any significant local detail to those controls and policies?
- 6** Policy RNP10: this relates to a Nationally Significant Infrastructure Project (NSIP). Section 38B of the Planning and Compulsory Purchase Act 2004 (as amended) precludes provision for NSIPs in NPs. Does the RPC have any legal justification for the inclusion of this Policy with its detailed list of requirements?