



Milton Ernest Parish Council
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Milton Ernest Neighbourhood Development Plan – Pre-submission consultation

I refer to your pre-submission consultation on the Milton Ernest Neighbourhood Development Plan.

Officers of Bedford Borough Council have offered informal comments throughout the preparation of the draft Plan with the aim of helping you improve the document. The Neighbourhood Plan is your document and you have final responsibility for its approach and detailed contents.

Now that you are consulting on the final draft Plan, as required under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012, it is appropriate that officers of the Council focus on those matters that could cause issues at the formal Examination, particularly in relation to the operation of the policies when planning applications have been submitted to the Council for determination. These are as follows:

The Neighbourhood Plan (NP) should contain only land use policies. While it is understandable that you might prefer to include non-policy boxes in the main part of the plan, it would be clearer if these were grouped in a separate annex to the plan so it is clear what is policy and what are aspirations.

General heritage comments

The policies and the wording of the Plan don't feel "especially 'Milton Ernest'". This in part derives from the lack of specific information or regard for the unique elements of Milton Ernest's historic environment. For example, a key element of the setting of Milton Ernest is the shrunken medieval village Scheduled Monument either side of Thurleigh Road, which is such an important part of the 'History and Character of the Area' (p.4) and the setting of the village (p. 17) but is not mentioned in the NP.

The same can be said for All Saints Church and Milton Ernest Hall (both grade I, and therefore of 'exceptional interest' nationally). Furthermore, there are unlisted buildings within the village which contribute to its unique character through their age,

appearance and materials used. This is covered partly in the associated Character Assessment, but unfortunately does not carry over into the body of the NP.

The following document produced by Historic England can provide important pointers in terms of the role played by heritage in NPs: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>.

Page 4 'History and character of the area'

This section should also aim to set out the contribution made by heritage assets to the character of the village and parish. This should include the various listed buildings and scheduled monuments, particularly the scheduled monument of the 'Shrunken medieval village at Milton Ernest' which is a defining element of the settlement's development over time. These assets make an important contribution to the character of the parish in their own right.

The plan should also ideally recognise non-designated heritage assets within the parish and their contribution to a sense of place and local distinctiveness. These are those heritage assets that do not benefit from statutory listing but nevertheless merit informal recognition due to their historic, architectural and sometimes archaeological interest.

The Council does not currently have a Local List but the making of a NP is a good opportunity to recognise those buildings or other heritage assets which residents believe make an important contribution to the character of their village and parish. Through the identification of such assets, the council can more easily seek to retain their character and the character of the village and the parish as a whole through the planning system.

Page 10

Paragraph 2.25

The first sentence should read that the neighbourhood plan has to be submitted within 12 months of the adoption of the Local Plan 2030.

Twinwoods section 2.26

Reference should be made to Yarls Wood Hermitage and Moated Site Scheduled Monument.

Paragraph 2.27

Second sentence could read 'As part of the preparation of the Local Plan 2030, BBC asked developers to identify sites where new garden villages could be provided.'

Page 11

Figure 4

Listed Buildings are noted on the map, but the two Scheduled Monuments to the north east should ideally also be included (as well as the listed buildings / structures to the south associated with Milton Hall). Alternatively we suggest an additional Figure with a map clearly showing the designated heritage assets within the NP Area.

Page 12

The map needs to be clear and not be based on a screen shot. The Parish Council can access information to create these maps through the Ordnance Survey.

Page 15

Paragraph 3.9.

This sentence should read as follows as the Local Plan is just one of the documents that form the development plan.

'It is important that the Neighbourhood Plan is read as a whole and in conjunction with Bedford Borough Council's ~~Local Plan development plan documents~~.' You may wish to include this link to our development plan web page. <https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/development-plan-documents>

Page 16

Objective 1

This is the only objective linked to the historic environment. Add "...and its historic environment" to the end of the sentence.

Page 17

Policy Area 1: Character

The wording here could relate more clearly to the historic environment, although it is noted that bullet point 2 references the Character Assessment and the content within. Previous comments regarding both designated and non-designated heritage assets and their identification through the NP process remain – this is an ideal opportunity to set out the assets which contribute to the character of the village and therefore allow the LPA to give this due weight in the planning process.

Setting and character

This section should mention the key contribution made by the scheduled earthworks which represent former medieval settlement and activity. Also, the parkland character of the grounds of Milton Ernest Hall which are visible on the approach to Milton Ernest from the south.

Page 18

Policy ME C1

The policy wording should be changed to reflect that Figure 9 should be named the Policies Map. In the last sentence, it is not just the BBC Local Plan policies that development will be assessed against. It is suggested to change this to – 'with Bedford Borough Council's development plan policies.'

Policy ME C2

First paragraph – the Character Assessment should be an appendix to the plan especially as applications will need to be determined against this policy and this document.

Change wording of third bullet point – substantial harm is, in policy and case law terms, a particularly high bar which is almost never reached short of total demolition / loss of a designated heritage asset. Development often will not be supported if they result in even a low degree of 'less than substantial harm' to the significance of a designated heritage asset, such as a listed building or a Scheduled Monument,

because their conservation is afforded great weight in the planning process. Consider revising to:

“Preserve the heritage significance of heritage assets through any proposed new alterations or new development in their setting, except where any loss of significance accords with local and national policy requirements”.

Page 19

Where is the evidence for the Local Green Space designations? It would be useful to provide this in a background document.

Page 20

Where is the evidence for the Milton Ernest Natural Areas? What evidence is there regarding condition, quality, value and benefit to the community? It would be useful to state that this is in a background document. Policy C4 is more restrictive than green belt policy so it would not meet the basic conditions.

Page 21

Figure 6

This map should be redrafted with a base map from the OS and not Google Earth. What is the reason for showing permanent grassland as this does not relate to the policies above?

It is also noted that the proposed permanent grassland takes in much of the Scheduled Monuments but not all of them. Ideally this plan should be amended so that the scheduled monuments in their entirety are included under ‘permanent grassland’. In addition to this there are some surrounding earthworks which are not covered by the scheduling but which would also benefit from inclusion in this category. Doing so would emphasise the importance of the permanent grassland and the role it plays in preserving the historic environment in Milton Ernest.

Page 23

Section 5.6

Again, there should be a mention of the Scheduled Monuments either side of Thurleigh Road, both of which incorporate public rights of way in and out of the village.

Page 24

Policy NE1 - There has to be recognition that minor development, for example house extensions, will not be able to nor would be required to result in gain. The policy needs to acknowledge that not all new development will have an impact on ecology. The Government intends to allow minor development (householder) not to trigger the requirement for net gain, especially where it occurs on residential garden land.

Policy ME NE3:

We question whether this is a workable policy. What are ‘features of the natural and built environment’? The policy examples refer to natural things – what built characteristics is the policy to protect?

Page 25

This map was produced as a result of a records search carried out in 2017. The map is now out of date and there is an additional County Wildlife Site that has been added since 2017 which is not shown on this map. It is suggested to remove this map from the document, although the records search could usefully be included in a background document.

Page 26

Paragraph 5.8

What does the term “light levels above 2 nanowatts/cm²/sr” mean? It would be helpful if this could be explained in simple terms.

Policy ME NE4

Where is the evidence for the light limits in the policy?

Paragraph 5.9 – the NPPG on light pollution was updated in 2019.

Page 29

Policy CF1 Community facilities

Question that the riverbank and open spaces are community ‘facilities’, although they are ‘social infrastructure’. The policy could be amended to refer to both terms of social and community infrastructure.

Page 30

Policy ME CF2

Are the green routes Rights of Way or something else? If so, they should be mapped so it is clear what this policy is referring to.

Page 32

Policy ME SD1

Consider if this is a policy that could be implemented as the wording only states ‘encouraged’? You might like to consider moving this to the text of the plan instead of in a policy.

Page 33

Policy SD3

This is a policy that we cannot mandate. A developer does not have to consult with the community, except on wind turbine applications.

Page 36

Paragraph 8.5

Third and fourth dot point – what is meant by buffer? Is this a gap or planting?

Page 37

Policy ME H1 (Rushden Road housing allocation)

The site has the potential to form part of the setting of ‘Lindham Court’ (list entry no.1321520) and ‘Barn and Outhouse at Lindham Court’ (list entry no.1114307); both of which are grade II listed. The policy wording for ME H1 makes no mention of the setting of the two adjacent listed buildings or the need for a buffer to mitigate the impact of the development on the listed building. This is covered in Section 8.5 of the document on page 36, which is a positive, but as the impact on a listed building is a

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constraint to development in this instance, the policy wording should reflect this. Suggested amendments to the policy is either:

d) the design and layout should seek to preserve the way in which setting contributes to the setting of heritage assets, particularly the two listed buildings adjacent to the south east corner of the site. A permanent 10 metre thick heritage buffer to protect the setting of the two listed properties is required.

OR

(c) A permanent 'buffer zone' at least 10 metres wide of public amenity land must be created along the entire boundary with the adjacent farmland and shared boundaries with the two listed buildings (in order to preserve their significance). This could be achieved, for example, by the provision of a woodland area or public allotments.

The allocation site forms part of the wider rural settings of the Grade I listed Parish Church of All Saints and the Scheduled Monument of the 'Shrunken medieval village at Milton Ernest'; whilst the development is unlikely to result in a level of prohibitive harm to these two assets through changes to their settings, Historic England would likely need to be consulted on a planning application given their Grade I and Scheduled Monument status. Furthermore, a detailed Statement of Significance and Impact Assessment will be required to accompany any forthcoming planning application (to include assessments of Lindham Court and Barn and Outhouse, Stone Cottage, the Church and the Scheduled Monument). Given the archaeological potential of the site itself, the Statement of Significance and Impact Assessment will need to include the results of an archaeological evaluation or this could form a standalone document. With this in mind we recommend the following additional point in policy ME H1:

A Heritage Statement of Significance and Impact Assessment will be required in order to describe the significance of the surrounding heritage assets and the likely impacts upon them. This document will need to incorporate or be accompanied by the results of a pre-determination archaeological evaluation.

Policy ME H1 Bullet b) restricts development to be not more than 18 dwellings per hectare. This could be a severe restriction on achieving 25 dwellings by the time you add in roads, green space, buffers, etc. Is there any need for the dwellings per hectare to be identified when the opening line states that the scheme must reflect the traditional character area and Policy H2 also requires accordance with the character study?

Page 38

This map should be labelled as Policies Map. It should also be drawn on an OS base map rather than a screen shot as the base map. It should clearly identify the new SPA boundary, housing allocation site and other open space designations.

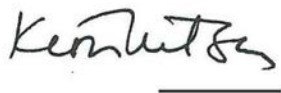
Page 42

Section 9 'Transport'

The traffic calming measures along Thurleigh Road closest to the Church have resulted in harm to its significance, any additional measures in the village would need to be carefully considered with regards to impacts on the setting of heritage assets.

If you have any queries please feel free to contact us.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Kim Wilson', with a horizontal line underneath.

Kim Wilson
Team Leader Planning Policy