



Leighton Linslade Neighbourhood Plan Representations

Land at Dunnock Drive & Land at Aurora Rise, Leighton Buzzard

November 2025



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1.0 Introduction

- 1.1 Arrow Planning Limited, on behalf of Arnold White Estates Limited ('AWE'), has prepared this response to the Leighton Linlade Neighbourhood Plan Regulation 14 Consultation and its supporting Appendices ('the Draft NP').
- 1.2 These Representations are set within the context of AWE's landholdings at Dunnock Drive, Leighton Buzzard ('the DD Site') which is also known as Site 15C and Aurora Rise, Leighton Buzzard ('the AR Site'), which is also known as Site 17A. Both are described in further detail below.
- 1.3 AWE are the owners of the DD and AR Sites which have been the subject of previous planning applications and appeals.
- 1.4 AWE strongly object to the designation of both the DD Site and the AR Site as Local Green Spaces (LGS) within the Draft NP for the reasons set out below. The designations should be removed from the Draft NP and should not be included in the submitted Plan given:
 - Both sites benefit from extant planning permission for residential development which is a material consideration;
 - Central Bedfordshire cannot demonstrate a 5 Year Housing Land Supply (5YHLS) and so should seek to optimise available sites for the delivery of housing;
 - There is little justification for designating our client's land as LGS and they do not meet the NPPF criteria for this;
 - The proposed designations appear to be an attempt to sterilise land, contrary to national advice in the Planning Practice Guidance (PPG);
 - The Draft NP is not consistent with national policy and advice and therefore does not meet the Basic Condition tests. It would ultimately fail if it were to reach the examination stage in its current form and the designations would have to be removed.

This Statement

- 1.5 The Representations contained within this Statement assess whether the Draft NP considers the accurate baseline position of the land and correctly assesses the suitability of the sites for designation as LGS.
- 1.6 These representations are structured as follows:
 - Section 2 sets out the context of both sites;
 - Section 3 provides a summary of the background to the sites and planning history;
 - Section 4 sets out the planning policy and PPG requirements for Neighbourhood Plans and LGS designation;
 - Section 5 responds to the Draft NP and assesses the suitability of the sites as areas of LGS with reference to the NPPF and PPG; and

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- Section 6 provides concluding thoughts and recommendations on the Draft NP designations.

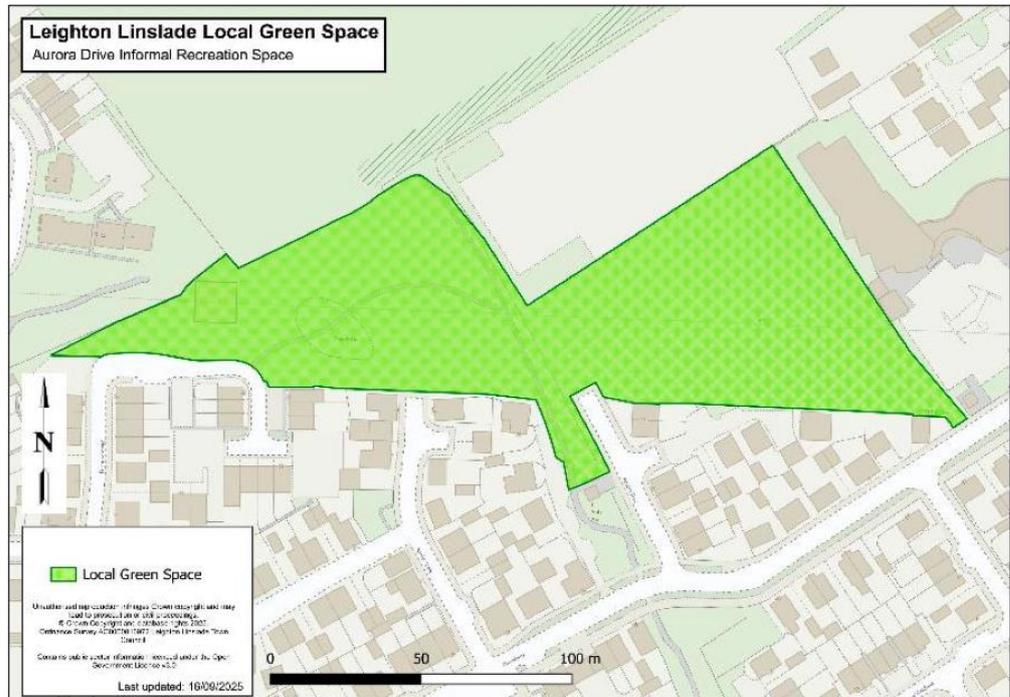


Figure 2 – Aurora Rise Proposed LGS Allocation

- 2.5 The AR Site sits north of Theedway, with the residential cul-de-sacs of Aurora Rise, Apollo Croft, and Fortuna Mead sitting south of the boundary. The majority of the Site is, similarly, minimally grassland. Within the western area there is an area of play equipment which sits to the east of the pylon. Like the DD Site, there is an unenclosed 400kV pylon (with associated electricity line) within the parcel of land which dominates the western parcel in particular.
- 2.6 The AR Site (also referred to as Site 17A), also forms part of a wider residential development which was granted outline consent by the Secretary of State through the same aforementioned appeal in December 2007.
- 2.7 The area is therefore characterised by modern residential estate layouts and incidental green spaces serving as breaks within the built form rather than as distinct landscape features.
- 2.8 Regarding the DD Site, in 1964, National Grid was granted a temporary contractual wayleave over the land under and adjacent to the overhead electricity lines and pylons. After AWE served notice to terminate the wayleave in 2008, National Grid applied for a statutory necessary wayleave and the decision was made by the Secretary of State in 2010 to grant a necessary wayleave for a minimum term of 15 years in 2010. Notice to terminate this wayleave can therefore be served by AWE from June 2025 onwards.
- 2.9 Regarding the AR Site, a deed of grant of easement relating to the overhead electricity lines crossing that site was granted to National Grid in 2014.
- 2.10 The vast majority of the areas outlined in green in Figure 1 and Figure 2, which are proposed for designation as LGS, contain no formal play or recreational equipment, and instead comprise minimally managed grassland. The presence of the pylons and overhead power lines above this land and their associated

infrastructure and noise significantly limit opportunities for meaningful public use, enjoyment or environmental enhancement of this land.

- 2.11 The pylons and power lines are both a visual and aural influence upon the character of the land. They dominate the space and fundamentally affect its character, along with the nature of use that can occur on the land.

3.0 Background

- 3.1 The planning history for this Site is complex and spans many years.
- 3.2 Outline planning permission (ref. SB/06/00869/OUT) was granted for residential development on the land either side of, and including, the DD Site (Site 15C) at appeal on 5 December 2007.
- 3.3 The permission was for *“the erection of up to 720 dwellings, together with the site for a single storey Lower School, associated play space, landscaping, parking and access (in accordance with application ref: SB/OUT/06/0869 dated 3 August 2006)”*.
- 3.4 Outline planning permission (ref. SB/06/00867/OUT) was granted for residential development on land including the AR Site (Site 17A) at appeal on 5 December 2007.
- 3.5 The permission was for *“erection of up to 475 dwellings together with local centre, associated play space, landscaping, parking and access and retention of grovebury farmhouse and demolition of all other buildings”*.
- 3.6 There were conditions attached to the permissions which related specifically to the DD and AR Sites, and, importantly, the parameter plans provided for the development of both sites with and without the pylon lines in place.
- 3.7 These parameter plans, which were consented and conditioned as part of the 2007 planning appeal, included residential development on both the DD and AR Sites.
- 3.8 Reserved matters were submitted in 2012 and 2013 respectively and the development, subsequent to the outline permissions, was commenced. The DD Site was not built out as part of these works due to the decision of the Secretary of State to grant a necessary wayleave which could not be terminated until 2025 and due to the presence of the deed of easement in the case of the AR Site. However, as the original permissions have been implemented, both sites still benefit from an extant outline planning permission which can be brought forward at any time.
- 3.9 It is also noteworthy that the Council’s published 5YHLS currently sits at 4.85 years, below the five-year requirement.

4.0 Planning Policy Requirements for Neighbourhood Plans

- 4.1 Guidance and advice for the content of Neighbourhood Plans is contained in the National Planning Policy Framework (NPPF) (2024) and Planning Practice Guidance (PPG).
- 4.2 Paragraph 13 of the NPPF states that *“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies”*.
- 4.3 Paragraph 106 states that *“The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period”*.
- 4.4 Paragraph 107 of the NPPF sets out three criteria for LGS, that it should be:
- a) in reasonably close proximity to the community it serves;
 - b) demonstrably special to a local community and hold a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - c) local in character and not an extensive tract of land.
- 4.5 PPG Paragraph 007 (Reference ID: 37-007-20140306) states that *“Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making”*.
- 4.6 PPG Paragraph 008 (Reference ID: 37-008-20140306) states that ***“Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented”*** (emphasis added).
- 4.7 Furthermore, Paragraph 015 (Reference ID: 37-015-20140306) states that LGS *“designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name”*.

5.0 Response to the Draft Neighbourhood Plan

Proposed Draft NP LGS Designation

- 5.1 The Draft NP designates the DD and AR Sites as LGS. It states that *“New development will not be permitted on land designated as Local Green Space except in very special circumstances or where it is ancillary to the use of the land for public recreational purposes”*.
- 5.2 Appendix D to the Draft NP specifies that both the DD and AR Sites are:
- Not subject to a planning permission for development;
 - Not allocated for development within the Local Plan;
 - Have no equal designation in place; and
 - No other reason not to pass Stage 2 and therefore passes to Stage 2.
- 5.3 The Stage 2 field survey results note that, in accordance with the NPPF criteria, the sites are not extensive, are in close proximity to the community they serve, and are both demonstrably special and locally significant for reasons of “recreation” (as opposed to beauty, history, tranquillity, wildlife or other).
- 5.4 The individual site summaries recommend the DD Site for designation, noting that it is *“within relatively new development area, providing open space and a focal feature – high local landscape value despite pylons running through it”* and *“has recreational value, also connects through to larger greenspace with lake to east”*.
- 5.5 In respect of the AR Site, the individual site summaries note that it is a *“valued recreational site – adjacent to residential area, no other similar space within easy walking distance”*. It then goes on to state that the *“facilities include play area, surfaced path. Mature hedge along edge – wildlife value”*.

Assessment of Sites Against NPPF Criteria

- 5.6 In accordance with the NPPF, the Draft NP identifies the following LGS criteria:
- (a) In reasonably close proximity to the community it serves;
 - (b) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - (c) Local in character and is not an extensive tract of land.

The DD Site

We have assessed the DD Site against the NPPF criteria in the table below.

NPPF Criteria	The DD Site Assessment
a) In reasonably close proximity to the community it serves	This parcel of land is within close proximity to the community it serves.
b) Demonstrably special to a local community and holds a particular local significance – <ul style="list-style-type: none"> i. beauty ii. historic significance iii. recreational value iv. tranquility v. richness of wildlife 	<p>The presence of pylons and overhead electricity lines within the Site limits any opportunities for the Site to contribute to the ‘beauty’ of the surrounding area. The impact of the pylons is also acknowledged within the Council’s own LGS assessment.</p> <p>The land is fairly newly restored quarry land and therefore holds no ‘historic significance’.</p> <p>The Site is considered to hold very little ‘recreational value’. The only recreational value offered by the Site is within the small designated play area and MUGA within the northeast part of the land.</p> <p>The Site is bisected by overhead electricity lines and pylons which provide an audible buzzing and it is therefore considered that the Site offers no ‘tranquillity’.</p> <p>As the Site is managed grassland and is often used for access between the roads adjacent to the north and south and therefore offers little opportunities for the improvement of the ‘richness of wildlife’.</p>
c) Local in character and is not an extensive tract of land	This parcel of land is local in character and not extensive.

- 5.7 Whilst it is acknowledged that the DD Site is within close proximity to a residential community (criterion a), and is not an extensive tract of land (criterion c), it is considered that criterion (b) is **not met** by the DD Site as it is not considered to hold any “demonstrably special” or “particular local significance” with regards to the specified criteria.
- 5.8 With regards to “beauty”, the presence of pylons and overhead power lines substantially detracts from any positive visual impact or landscape value of the land, therefore limiting opportunities for the space to make a positive visual contribution to the character of the surrounding area. The Council’s own LGS assessment describes the site as *“within relatively new development area, providing open space and focal feature – high local landscape value despite pylons running through it.”* This statement implicitly acknowledges that the pylons are a significant detracting feature. The claimed *“high local landscape value”* appears to be subjective and unsubstantiated, particularly given the clear physical and visual disruption created by the overhead infrastructure and the acknowledgement of it within the same sentence.
- 5.9 The land holds no historic significance as it was only ever utilised as incidental open space as part of the adjacent housing development within the past decade. Its relatively recent origin further undermines any claim to established community significance.

- 5.10 With regards to tranquillity, the land currently has overhead electricity lines and pylons situated within its boundary. This National Grid infrastructure creates a consistent audible buzzing, which detracts from any tranquillity that the DD Site may have been able to provide.
- 5.11 The land holds no value with regard to the richness of wildlife as the grassland is generally managed.
- 5.12 The Draft NP designates the Site due to its recreational value albeit no further detail or evidence is provided as to why the Site is considered to offer recreational value. Indeed, the presence of the power lines and pylons significantly limits the nature and type of recreational activities that can take place on the land without the express permission of National Grid. It is therefore considered that the DD Site provides minimal recreational value.
- 5.13 The linear part of the land, between Hawfinch Grove/Winchat Gardens and Peregrine Mead/Goshawk Green (shown on Figure 1), contains no play equipment or defined use and appears to function primarily as minimally managed grassland interspersed with large areas of what appears to be self-sown shrubbery.
- 5.14 This area offers limited opportunities for play, sport, or other community activities. Equally, the pylons overhead limit any desire to utilise the space for recreation purposes. There are play facilities and a Multi-Use Games Areas (MUGA) on the north east part of the DD Site, as well as Astral Lake and the routes that surround it, which ultimately offer ample recreational opportunities of much higher quality in a safer environment, such that the majority of the area is not used for recreational purposes.
- 5.15 The DD Site cannot be considered to be “demonstrably special” or hold “particular local significance” and should not be designated as LGS.

The AR Site

- 5.16 We have assessed the AR Site against the NPPF criteria in the table below.

NPPF Criteria	The AR Site Assessment
d) In reasonably close proximity to the community it serves	This parcel of land is within close proximity to the community it serves.
e) Demonstrably special to a local community and holds a particular local significance – <ul style="list-style-type: none"> vi. beauty vii. historic significance viii. recreational value ix. tranquillity x. richness of wildlife 	<p>The presence of pylons and overhead electricity lines within the Site limits any opportunities for the Site to contribute to the ‘beauty’ of the surrounding area.</p> <p>The land was in use as pasture land until fairly recently and therefore holds no ‘historic significance’.</p> <p>The Site is considered to hold very little ‘recreational value’. The only recreational value offered by the Site is within the small designated play area within the western parcel.</p> <p>The Site is bisected by overhead electricity lines and pylons which provide an audible buzzing and it</p>

NPPF Criteria	The AR Site Assessment
	<p>is therefore considered that the Site offers no 'tranquillity'.</p> <p>The grassland on the land is maintained and therefore offers limited opportunities for improvements to the richness of wildlife</p>
f) Local in character and is not an extensive tract of land	This parcel of land is local in character and not extensive.

- 5.17 Whilst it is acknowledged that the AR Site is within close proximity to a residential community (criterion a), and is not an extensive tract of land (criterion c), it is considered that criterion (b) is **not met** by the AR Site as it is not considered to hold any “demonstrably special” or “particular local significance” with regards to the specified criteria.
- 5.18 With regard to the beauty of the Site, there is a large pylon and overhead electricity lines running over the land, these features distinctly detract from any positive visual impact that may have been provided by the Site.
- 5.19 Similarly to the DD Site, the Site was only first utilised as incidental open space along with the development of the wider housing scheme some ten years ago. It is therefore considered that the Site provides no historic significance.
- 5.20 The western parcel of the Site houses some formal play equipment and a surfaced path, as identified within the Council’s LGS assessment, however the eastern parcel is somewhat overgrown with little opportunities for access. The eastern parcel therefore offers little to no recreational value.
- 5.21 Also similarly to the DD Site, the presence of the overhead electricity lines and pylons generates an audible buzzing which detracts from any tranquillity that the Site may have been considered to provide.
- 5.22 The grassland, of which the Site is comprised, is generally maintained and therefore any opportunities for the enhancement of the richness of wildlife are heavily restricted.
- 5.23 It is therefore considered that the Site cannot be considered to be “demonstrably special” or hold “particular local significance” and should not be designated as LGS.

Summary of Assessment Against NPPF

- 5.24 It is considered that the DD and AR Sites both clearly fail to meet the LGS criteria for the reasons outlined above, but primarily by lack of performance against criterion (b). The land parcels lack aesthetic, historic, or recreational merit and function as incidental open space of limited quality.
- 5.25 The removal of the designation would be more reflective of Paragraph 106 of the NPPF (December 2024), which confirms that LGS designations should be consistent with the local planning of sustainable development and complement investment in sufficient homes. The focus of Paragraph 106 on delivering

sufficient homes is particularly pertinent due to CBC's inability to demonstrate a 5YHLS.

Summary of Assessment Against PPG

- 5.26 The Sites were granted outline planning permission, by way of the appeal decision dated December 2007, which still has the ability to be implemented as reserved matters applications were submitted within the required timeframes. These Sites benefit from live extant planning consents and, therefore, in line with PPG Paragraph 008 (Reference ID: 37-008-20140306), the Sites should not be allocated as LGS.
- 5.27 It is also of note that the allocation of these Sites as LGS would not be in general conformity with the strategic policies contained within the Development Plan for the area as it would sterilise the land for development, with regard to PPG Paragraph 007 (Reference ID: 37-007-20140306). This is particularly pertinent within the context that CBC cannot currently demonstrate a 5YHLS, therefore adding further merit to the proposed provision of housing on these land parcels.
- 5.28 For these reasons, the draft NP does not meet the Basic Conditions required and would not therefore pass examination.

6.0 Conclusions

- 6.1 The assessment of the land against the criteria as provided by the NPPF is inaccurate and unconsidered, particularly in regard to criterion (b).
- 6.2 The planning history of the Site outlines its ability to come forward for residential development in the near future; therefore, if the designation is not amended within the forthcoming NP, the land will be unnecessarily sterilised for development within a district which cannot demonstrate a suitable housing land supply and therefore carries a distinct need for housing development.
- 6.3 The allocation of these Sites as LGS would be contrary to the relevant guidance and advice contained in the NPPF and PPG, and would therefore not meet the Basic Conditions as required in the preparation of a Neighbourhood Plan. The removal of these allocations would allow the Neighbourhood Plan to pass the Basic Conditions Test.
- 6.4 Arrow Planning and AWE would welcome further engagement with the Town Council to refine the evidence base and to help shape a deliverable, balanced, and future-proofed NP for Leighton Linlade.



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