

By e-mail to:
Mr Paul Russell
Leighton Linlade Town Council

Our ref: PL00800211
Your ref:
Date: 10/12/2025

Direct Dial:
Mobile:



Dear Mr Russell,

Ref: Leighton Linlade Neighbourhood Plan Regulation 14 Consultation

Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Leighton Linlade Neighbourhood Plan.

Historic England is the government's advisor on planning for the historic environment including the conservation and enhancement of heritage assets. We champion good design in historic places and support neighbourhood planning to achieve the most for their communities through their policies and allocations. As such our comments are limited to those areas where we have a remit and silence on other areas should not be treated as support or objection.

Your Neighbourhood Plan is an important opportunity to set the agenda for your place, setting out what is important about different aspects of the plan area or specific parts of it, and providing clear policy and guidance to decision makers – be the property owners, planners or developers – to guide how the place should develop over the course of the plan period.

It is the Town Council's right to decide what planning matters you want to address in your plan so long as it delivers sustainable development and achieves basic conformance with the National Planning Policy Framework and Local Plan's strategic policies, Paragraph 203 of the [National Planning Policy Framework](#) (2024) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment.

You will need to demonstrate that your plan policies achieve this aim by considering their impacts on the historic environment of the plan areas and that it conforms with the Local Plan's strategic policies for heritage.

In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

Where proposals affect heritage assets (including site allocations) you will need to show that the effect on the 'significance' of those assets has been understood. The NPPF places a high value on the conservation of designated heritage assets including protecting the contribution made by their settings.

It also sets out a need to consider the effects on non-designated heritage assets, including the effect of development on their significance. Harm to their significance requires clear and convincing justification in planning decisions based on the public benefit that could not otherwise be delivered. Measures should be taken to avoid harm to their significance, or to minimise harm that can't be avoided.

We welcome the production of your neighbourhood plan and are pleased to see that the historic environment within your plan area features within your objectives and policies and recognise the work that members of the steering group have carried out to prepare this draft neighbourhood plan.

Our substantive comments are focused on the main allocation site in Policy LL5.

However, we are pleased to see policies such as LL1 consider the role that heritage and the historic environment can play in town centre regeneration, as well as exploring opportunities to enhance heritage and create a heritage focus area in Policies LL3&4.

Similarly, we welcome the inclusion on LL2, particularly those strategies which seek to embed heritage-led placemaking and setting out a plan for shop front designs.

We suggest a minor amendment to wording 'attention drawn to' changed to 'design will demonstrate'.

You may find our additional resources (available on our website) of interest

[Historic Towns and High Streets](#)

[Heritage Led Regeneration Toolkit](#)

[Historic England Advice Note - Streets for All: Advice for Highway and Public Realm Works in Historic Places](#)

Policy LL5: LAND SOUTH OF THE HIGH STREET

We note Policy LL5 which allocates approximately 2.65 hectares of land to the south of the High Street, for a comprehensive, mixed-use development including cultural and community facilities and up to 151 dwellings.

In principle, we do not object at this stage to the allocation of a brownfield site within part of the Leighton Buzzard Conservation Area as this can enhance areas which make a negative

contribution to the character and appearance of a conservation area whilst providing opportunities for greening, reduced traffic, increased footfall and well-designed places.

Given scale of this allocation within a sensitive location including many listed buildings and a Conservation Area, we strongly support the recommendations of the Strategic Environmental Assessment that this policy should be amended to include heritage-led design principles for the allocation policy to ensure positive outcomes for the historic environment as you have done within policies LL1-LL4.

We recommend that a new clause is added with wording consistent with policies LL1-LL4 e.g. 'development will be supported where proposals are able to demonstrate they are heritage-led by seeking to preserve and celebrate local character and heritage in their design, layout, form, height and massing'.

We also suggest that this policy could include a new clause explicitly guiding future development to be informed by both the Land South of the High Street Spatial Plan and CBC Design Code.

We note that the Spatial Plan covering this site identifies locations within this site where buildings of four storeys may be acceptable, and the CBC Design Code encourages higher density within town centre locations. Whilst the surrounding, existing built form, height and rhythm could accommodate this, it will be important that any future design is informed by local context and character and be sensitive to the surrounding height and ridges.

Your policy may also wish to consider if there are any key views which should be retained in and out of the Conservation Area. For example, p.38, fig.28 of the Spatial Plan shows a view within this site of the church spire. Your plan may wish to include either policy wording or a new policy which identifies key views which should be maintained.

We also suggest for clarity that if design principles should follow the CBC District Wide code, this should be made in clear in this section.

General Comments – Non-Designated Heritage Assets

Your Neighbourhood Plan is also an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character.

Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection



from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>

Our general advice on successfully incorporating historic environment considerations into your neighbourhood plan can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For any specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Central Bedfordshire Council.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

[Redacted signature block]