

Linslade Town Council
The White House
Hockliffe Street
Leighton Buzzard
Bedfordshire
LU7 1HD

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30th November 2025

Dear Town Clerk,

**REPRESENTATION TO LEIGHTON LINSLADE TOWN COUNCIL
REGULATION 14 PRE-SUBMISSION CONSULTATION - LEIGHTON LINSLADE NEIGHBOURHOOD PLAN 2024-2042**

This representation is submitted in response to the Leighton Linslade Neighbourhood Plan (LLNP) Regulation 14 pre-submission consultation (October 2025) on behalf of the landowners (the Ascott Nominees Ltd (and Ascott Farms Limited) in respect of these two parcels of Land (1) Southcourt Stud Farm (and (2) Wyngates Allotment. These are numbered 59 and 24 on the Local Green Spaces Report produced by the Greensand Trust.

The Plan contains several well-intentioned policies aimed at town centre renewal and placemaking. However, it contains a number of fundamental deficiencies that will render the LLNP unsound at examination unless substantial revisions are made. These deficiencies span:

- **Conflict with the NPPF** with no proposed policies on meeting local housing needs
- **Procedural failings** in consultation on Local Green Space (LGS) designations
- **Evidence base deficiencies** in LGS assessments and housing policy justifications
- **Policy wording clarity** issues affecting decision-making consistency
- **Inadequate assessment of compatibility** with adopted strategic policies and viability assumptions
- **Unrealistic deliverability assumptions** that lack clear implementation mechanisms

This representation builds upon earlier representations submitted by our client (reference NDLP/LB/01 of 6th October 2025) and incorporates by reference the concerns therein, which remain valid.

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1. Meeting Local Housing Needs

A Housing Needs Assessment (HNA, March 2025) was carried out to inform the draft Neighbourhood Plan. The HNA confirms that Leighton Linlade has a housing stock of 17,798 dwellings according to the 2021 Census. The HNA further notes that, in consideration of increase in housing stock since the 2021 Census, the current housing stock amounts to 19,199 dwellings.

Section 2.5 of the HNA notes that Central Bedfordshire Council (CBC) has not yet provided a housing requirement within neighbourhood plan areas.

In this context, the national planning policy guidance (NPPG para 097 ref ID 41-097-20190509) notes that the identified housing requirement should be derived from either:

- Housing figure for the neighbourhood area set out in strategic policies (to be defined by CBC)
- Indicative figure provided by the LPA (to be defined by CBC)
- Exceptionally determined by the neighbourhood planning body (set out by LLTC)

To inform the local housing needs, the NPPG notes that the standard method should be used in the first instance, unless specific circumstances justify an alternative approach, noting, however, that the HNA does not provide an alternative approach. Whilst it is understood that CBC will set out the overall spatial strategy informing the housing requirement across the council area, it is recommended to plan for growth in alignment with the standard method to ensure that the Neighbourhood Plan makes provision for sufficient dwellings for consistency with the emerging Local Plan in evidenced anticipation of the required needs.

In applying the Government's standard method to Leighton Linlade, ca 5,748 new homes are required as set out in the following calculation.

- Baseline: 19,199 dwellings (based on the HNA). 0.8% of existing stock = 153.59 dwellings per annum (dpa)
- Affordability ratio (five-year average: 10.68)
- Adjustment factor: 2.08
- Affordability x existing stock = 319 dpa
- 18-year plan period = 5,748 dwellings

Based on a local housing need of 5,748 new dwellings, it is expected that the Neighbourhood Plan ensures that sufficient dwellings can be provided within its plan period, with a clear strategy including allocations, intensification where appropriate and a small allowance for windfall sites (i.e. 10% of the requirement) to come forward.

Therefore, it is expected that a large-scale allocation will be required, complemented by further, smaller allocations to meet the expected housing requirement. Equally, policies that inherently restrict development must be robustly justified to ensure that the Neighbourhood Plan does not conflict with national policies and the emerging Local Plan.

The site on land at Southcourt has potential to deliver ca 1,800 units, thereby significantly contributing to the local housing needs including provision of affordable housing. The site is available, suitable and achievable for development.

However, as set out in this Representation, a number of unjustified, restricting policies would significantly undermine the potential for sites, such as the site on land at Southcourt, to be delivered. This approach is considered to make the Neighbourhood Plan unsound.

Recommended Action: Prior to Regulation 15 submission, LLTC should:

- Define the housing requirement over the plan period in discussion with CBC

- Undertake a further consultation on potential site allocations
- Provide a clear strategy to ensure the local housing needs can be met

2. Local Green Space Designations: Procedural and Substantive Defects

Consultation Failure and Breach of PPG Requirements

Policy LL9 designates 38 Local Green Spaces (LGS) across the Neighbourhood Plan area. However, the designation process has been undertaken in material breach of Planning Policy Guidance (PPG) paragraph 37-019, which explicitly states:

“The Qualifying body should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space”

As documented in our letter of the October 2025, Leighton Linlade Town Council (LLTC) contacted landowners of key strategic sites only 4 weeks prior to the Regulation 14 consultation. By the time this had been received by the landowners and their professional team, it provided just 10 working days for meaningful consideration and response. This falls materially short of the ‘early stage’ requirement enshrined in national guidance and reflects a fundamental procedural defect in plan preparation.

Recommended Action: Prior to Regulation 15 submission, LLTC should:

- Conduct proper, documented early engagement with all landowners of designated LGS sites (ideally within 6 months minimum)
- Record all consultation activity and substantive landowner responses in the Consultation Statement
- Give genuine consideration to evidence-based objections and revise the LGS list

Deficient Evidence Base for LGS Designations

Policy LL9 relies on Appendix D: Local Green Spaces Report (September 2025) prepared by the Greensand Trust. Whilst this Appendix provides welcomed clarification, significant evidential gaps remain:

Assessment Transparency and Methodology:

- **No assessor qualifications disclosed:** The Report (lead author: Jon Balaam, Greensand Trust) provides no details of professional qualifications, relevant experience in landscape assessment, ecology, or LGS methodology, nor any CV or accreditation (e.g. CMLI, CIEEM). PPG 37-013 requires a ‘robust, proportionate evidence base’ prepared by competent professionals; the absence of credentials undermines assessment credibility.
- **Limited survey documentation:** Appendix D Section 4 provides brief site summaries (typically 2-4 bullet points per site) but lacks detailed field survey pro-formas, dated photographs (fieldwork conducted ‘late 2022 and early 2023’), transect records, or quantitative assessment matrices. Table 2 provides only tick-box criteria ratings (a, b, d, e, etc.) without substantiation.

- **No specialist ecological surveys:** Several sites are designated partly on wildlife grounds, yet no Phase 1 habitat surveys, bat surveys, bird surveys or other ecological records are evident in the evidence base.
- **Undocumented "borderline" decisions:** Appendix D Section 2b notes that "borderline" sites were "discussed with the Neighbourhood Plan Steering Group before proceeding," but no meeting minutes, explicit decision criteria, or audit trail are published. Review of Steering Group and Working Party minutes (12 Sept 2024, 10 Oct 2024, 16 Jan 2025) confirms no substantive discussion of specific LGS sites or landowner engagement, only procedural matters. This internal, undocumented process excludes affected landowners from meaningful representation, breaching procedural fairness and PPG 37-019.

National Policy Compliance:

PPG 37-013 requires that 'Land can be designated as Local Green Space even if it is not publicly accessible, but it must be demonstrably special to the local community in one or more ways.' Appendix D fails to demonstrate this standard robustly, as it lacks:

- A consistent, transparent scoring methodology with evidential cross-references for all sites
- Full disclosure of 'borderline' discussion records (if any were conducted with substantive landowner engagement)
- Explicit methodology alignment with Central Bedfordshire Council's LGS guidance and NPPF paragraphs 107-108

Recommended Action: LLTC should revise the evidence base to include detailed scoring matrices, explicit methodology justifying all 38 sites against NPPF criteria, and publish full records of borderline site discussions, including any landowner input.

Breach of NPPF Tests for Specific LGS Designations

Southcourt Stud Farm (LGS 59)

Appendix D Summary: 'Highly valued locally as open landscape and significant contribution to local landscape character. Attractive area of small paddock-like fields and hedgerows, trees and hedgerows bring wildlife value' (meets criteria a=beauty, b=historic, d=tranquillity, e=wildlife).

Objections:

i) Green Belt Status and Extensive Tract Test

The site is wholly within the Green Belt, approximately 146.41 hectares in size with the area proposed for LGS designation immediately adjacent to the Southcourt Stud occupying >10 hectares. PPG 37-010 and Central Bedfordshire LGS guidance identify Green Belt designation as an automatic Stage 1 exclusion under the proportionality test. Appendix D acknowledges ('Green Belt does not necessarily preclude LGS') but then disregards CBC's Stage 1 methodology by advancing the site without addressing this initial barrier.

NPPF paragraph 107(c) explicitly prohibits 'extensive tracts' of land from LGS designation. At >10 hectares within a large 146+ hectare agricultural holding and given its predominant grazing use and open field pattern, the site materially exceeds CBC's guidance thresholds and resembles open countryside rather than a discretely-bounded, locally-scaled green space. The assessment provides no rationale for why this threshold test has been overcome.

ii) **Absence of Demonstrable Special Qualities**

Criterion (a) (Beauty/Landscape Character): Appendix D asserts 'significant contribution to local landscape character' but provides no supporting evidence. Our clients hold a robust landscape evidence base (referenced in representations to CBC) characterising the site as typical 'small to medium scale fields defined by hedgerows and hedgerow trees' on a 'clay plateau' comprising ordinary features of Landscape Character Area 8A (Toddington-Hockliffe Clay Hills) and Buckinghamshire LCA 4.13 (Cublington-Wing Plateau). Appendix D contains no viewpoint analysis, Landscape Character Assessment comparison, or visual baseline to substantiate claims of 'significant' contribution; field visits document generics ('attractive area of small paddock-like fields') without specialist landscape assessment.

Criterion (b) (Historic Significance): Appendix D provides no evidence of historic buildings, monuments, or landscape features of local significance. Field notes record only generic features absent from standard heritage records.

Criterion (d) (Tranquillity): The site's proximity to the A4146 embankment severs the landscape setting; road noise and infrastructure presence (overhead lines, embankment) materially dilute any claimed tranquillity. Ambient noise impact or any operational noise associated with Southcourt Stud have not been assessed.

Criterion (e) (Wildlife Richness): 'Trees and hedgerows' are commonplace in agricultural settings. Ordinary hedgerows (non-priority habitats under UK Biodiversity Action Plan criteria) do not equate to 'richness.' Appendix D records no Phase 1 habitat survey, species records, or ecological baseline to justify wildlife designation.

iii) **Private Use and Community Benefit**

The site is private farmland with no public access or community recreational use. This materially undermines criterion (c) (recreational value) and the fundamental premise that the space is 'demonstrably special to the local community.' No evidence of community consultation, or demonstrated public valuation is present in Appendix D or Steering Group records.

iv) **Conflict with Strategic Housing Delivery**

Central Bedfordshire Council (CBC) is experiencing significant housing shortfalls relative to its local housing need, whereby Leighton Linlade's contribution to local housing needs, based on the application of the Standard Method, equates to ca 5,748 dwellings which would need to be provided within the plan period (18 years). LGS designation of this strategic site (noted as agriculturally productive land) would clearly and unjustifiably restrict development potential during a period of acute housing need, directly conflicting with NPPF paragraph 106 (conserving and

enhancing the natural environment whilst recognising the need for development), NPPF paragraph 14 in conjunction with para 69 (meeting housing needs) and CBC's growth strategy for meeting housing needs in sustainable locations.

Recommended Action: LLTC should delete LGS 59 (Southcourt Stud Farm) from Policy LL9.

Wyangates Allotment (LGS24)

Appendix D Summary: 'High recreational value. Attractive, well-maintained and popular allotment site with high occupancy. Valued space for growing food. Accessible with car parking and surfaced path' (meets c=recreation, f=other/food growing).

Objections:

i) Green Belt Designation

Like LGS 59, this site is wholly within the Green Belt and should have been excluded at Stage 1 per PPG 37-010 and CBC guidance.

ii) Not 'Local' in Character

Allotments, whilst valuable, typically serve defined membership with private use restrictions. Wyngates operates on a membership basis (implied by 'high occupancy' and 'food growing' language), limiting open community access. This private use model undermines the claim to be a 'local' space serving the broader community. Appendix D provides no evidence of open public access or community value beyond private plot-holders. The site is not a discrete, locally scaled public amenity, it is a member-based facility.

iii) Criterion f (Food Growing) Lacks NPPF Basis

The NPPF's LGS test (paragraph 77) identifies five specific criteria: beauty, historic significance, recreational value, tranquillity, and richness of wildlife. 'Food growing' is not a criterion; it is a use exercised by private members of the allotments for individual purposes rather than food production for the benefit of the local community. Appendix D's reliance on criterion (f) "other" for food production is vague and lacks any quantified assessment of local significance. Many private uses (commercial, residential gardens, etc.) could justify inclusion under such a broad rubric, undermining the designation's precision and legal defensibility.

iv) Limited Evidence Base

The site-specific comments in Section 4 clearly lack any demonstrable evidence based assessment, such as usage surveys, membership data, demand assessment, or comparative analysis against other allotments in Central Bedfordshire. The statement that the site is 'high occupancy' is unsupported by waiting list data, turnover rates, or demand forecasting.

Recommended Action: LLTC should delete LGS 24 (Wyangates Allotment) from Policy LL9 immediately.

3. Housing Mix Policy (LL6): Misalignment with Evidence Base

Policy LL6 requires that over 50% of units on schemes of 5+ dwellings be 1-3 bedroom homes and defaults to M4(2)/M4(3) accessibility standards, subject to a viability caveat.

Evidence Base Conflict:

The AECOM Housing Needs Assessment (HNA) (March 2025, Table 5-9) recommends:

Dwelling Size	Current Mix (2011)	Suggested Mix (2044)	Indicative Policy Range
1-bed	8.3%	8.7%	10-20%
2-bed	27.5%	24.7%	10-20%
3-bed	40.6%	43.7%	50-60%
4-bed	23.5%	22.9%	20-30%

This data indicates that approximately 70-80% of new housing should be 1-3 bedrooms (combining 1-bed, 2-bed, and 3-bed ranges), not a rigid 50%+ floor on the smaller units alone. The HNA explicitly notes (Section 5.4.7):

‘a majority of new homes should have more than 3 bedrooms’ and ‘the result of this modelling process suggests that new development should deliver a variety of dwelling sizes, but that some priority should be given to the delivery of 3-bedroom homes.’

Policy LL6 Defect:

By prescribing ‘>50% of 1-3 bed units’ without reference to HNA data, LL6 lacks justification and risks skewing the mix away from the recommended priority for 3-bed homes (50-60% of all new housing). The policy conflates ‘1-3 bed’ as a single category, whereas the HNA recommends strategic differentiation (prioritising 3-bed whilst maintaining smaller units).

Equally, the policy does not allow for any flexibility should updated evidence be made available throughout the plan period. This could lead to outdated policies that conflict with new evidence, whereby future proposals would contravene the policies even when providing a housing mix that demonstrably meets current housing requirements.

Central Bedfordshire Strategic Conformity:

CBC Policy H1 (Housing Mix) does not mandate a 50%+ 1-3 bed floor. Instead, it requires ‘a mix of housing types and sizes in order to meet the needs of all sections of the community’ aligned with the SHMA/HNA. LL6’s prescriptive floor contradicts this flexible, evidence-led approach.

Accessibility Standards:

The default M4(2) requirement for all dwellings is not supported by the HNA. Whilst the HNA acknowledges the 101% increase in 65+ population (Section 1.4.2), it emphasises (Section 6.4.6) that accessibility should be delivered through ‘a mix of tenures, sizes, and locations’ rather than blanket mandates. CBC Policy H2 sets 35% M4(2) and 5% M4(3) targets; LL6’s significantly exceeds this and lacks viability justification given the Bailey Venning viability report (July 2025) already identifies negative land values for the principal allocation (LL5).

Recommended Action:

Revise LL6 to state: 'New housing should seek to provide a mix of 1-4 bedroom units aligned with Table 5-9 of the AECOM HNA, prioritising 50-60% 3-bed, 20-30% 4-bed, and 10-20% 1-2 bed units subject to the latest available HNA. Accessibility: Homes should seek to meet M4(2) standards where viable in accordance with Central Bedfordshire's requirements; seek the provision of M4(3) in accordance with national requirements where viable.

4. Strategic Fit and Policy Clarity

Lack of Explicit Alignment with Strategic Policies

The Plan contains a brief summary of Central Bedfordshire Local Plan (CBLP) policies in paras 2.6 to 2.9. However, the proposed neighbourhood plan policies do not clearly cross reference how these contribute to, align with, and do not undermine strategic policies which could result in clear conflicts with the emerging CBLP.

Risks:

- **Potential conflict with overarching policies:** Without explicit policy-to-policy mapping, the examiner may struggle to assess whether LL policies achieve conformity with CBLP requirements (e.g., whether LL6 is consistent with CBLP H1, whether LL9 conflicts with housing delivery targets, whether LL7 aligns with CBLP HQ3 infrastructure provision).
- **Vulnerability to Challenge:** Objectors (landowners, developers, infrastructure providers) may challenge the basis of the proposed policies, with a significant risk of the Neighbourhood Plan requiring substantial modifications at examination or requiring withdrawal due to failure on Basic Conditions as outlined in the NPPG (Paragraph: 065 Reference ID: 41-065-20140306).

Recommended Action:

Insert a matrix within Plan Section 2 cross-referencing each neighbourhood plan policy to: (a) the corresponding CBLP strategic policy, (b) the relevant NPPF paragraph(s), (c) the neighbourhood plan objective(s) it delivers, and (d) a short paragraph explaining conformity. Any proposed policies replicating overarching policies should be removed to avoid potential conflicts.

Vague Decision Making Language

Multiple policies (LL1, LL2, LL3, LL4, LL5) employ subjective criteria difficult to apply consistently:

- **LL1:** "celebrate heritage," "vibrant and lively evening economy," "spaces for people to come together" — aspirational rather than measurable.
- **LL2:** "experiential businesses," "imaginatively reactivating historic spaces" — subjective terms.
- **LL3:** "respond positively to the waterside setting," "imaginatively uses" — lacks clarity.
- **LL6:** "Healthy Homes standards" (undefined; no reference to national standards).

Examiner Precedent:

Planning inspectors consistently flag subjective policy language as failing the soundness test due to lack of clarity and difficulty in consistent application (RTPI guidance on neighbourhood plan soundness; recent planning inspector reports).

Recommended Action:

Revise policies to use clear, testable language:

For example, LL1 (amended): 'Development should ... incorporate heritage features or materials reflective of the Conservation Area character assessment, include publicly accessible meeting spaces of minimum X sqm, and provide evening uses (A3, A4) within Y metres of the town centre.'

5. Land South of High Street (LL5): Viability and Deliverability

Policy LL5 designates Land South of High Street for mixed-use development targeting ~151 new homes plus community facilities (health centre, cultural space, business incubation, public parking).

Viability Assessment Findings (Bailey Venning, July 2025):

The July 2025 viability scoping report (commissioned by LLTC) identifies critical viability challenges:

- **Option 1** (sheltered housing + 150 apartments + commercial): Residual Land Value (RLV) = -£2.3m. Viable only if developer accepts profit reduction to 13.1% GDV and benchmark land value is nominal.
- **Option 2** (community/creative uses + 182 apartments): RLV = -£5.4m. Viability "unlikely to be considered viable" even with nominal benchmark land value (profit would fall to 6.7% GDV).

Key Constraints:

- Multiple freehold and leasehold interests complicate assembly, no documented owner collaboration agreements or facilitation strategy.
- Commercial uses (retail, offices, health centre) act as a 'drag on viability' values close to construction cost, generating minimal surplus.
- Health centre funding uncertain; report notes this 'should be investigated further with local health commissioners.'
- Affordable housing requirement (CBC 30%) further erodes residual land value with no offset identified.

Plan Deficiency:

Policy LL5 makes no reference to viability constraints, ownership assembly challenges, or phasing/trigger mechanisms. The Plan notes the site's 'prolonged history of failed marketing and delivery attempts' (referencing CBC's 2012 Development Brief) but does not address why this allocation will succeed now or what public/private sector interventions would be required. Clear evidence should be provided to demonstrate that the site is available, suitable and achievable within the plan period.

Examiner Risk:

An examiner may deem the site undeliverable, potentially requiring deletion and consequent adjustments to housing supply projections in the Basic Conditions Statement.

Recommended Action:

Provide evidence to demonstrate site deliverability, inclusive of a viability summary to the Plan or Basic Conditions Statement detailing:

- Ownership structure and proposed assembly approach (e.g., development agreement, CPO facilitation by LLTC/CBC) in consideration of potential long leaseholds and/or break-clauses
- Detailed assumptions: unit mix, build costs, values, affordable housing headroom, S106 contributions
- Sensitivity analysis: impact of loss of commercial floorspace, phasing, or alternative uses (e.g., all residential)
- Consideration of Infrastructure requirements: Healthcare; Affordable housing; Public realm/culture/community space; education, commercial / office requirements

Whilst the deliverability of the site needs to be demonstrated to provide confidence that the site will be able to deliver ca 151 dwellings within the plan period, significant concern is raised that the provision of 151 dwellings within the plan period (18 years) is substantially below the requirement (ca 5,748 dwellings) as set out in Section 1 of this Representation.

6. Community Facilities and Infrastructure Policies (LL7, LL12)

It is welcomed that the Neighbourhood Plan seeks to ensure existing community assets are given a level of protection to avoid potential losses or limit any potential detrimental impacts on these (Policy LL7). Equally, infrastructure priorities are set out (Policy LL12).

However, concern is raised in relation to the broad protective nature of Policy LL7 and the implication of a requirement for financial contributions (Policy LL12). Any planning obligations sought by the local planning authority must meet the tests as set out in the NPPG (Paragraph: 002 Reference ID: 23b-002-20190901), including them being necessary, directly related to the proposed development, fairly and reasonable related in scale and kind to the development.

Whilst the infrastructure priorities are welcomed and aspirational, there is no clear delivery mechanism for these to be implemented, including funding sources, phasing or potential providers.

Furthermore, there is no explicit link to Central Bedfordshire's Infrastructure Delivery Plan (IDP), Section 106 SPD, or CBC's CIL regime (confirmed as not yet adopted).

Recommended Action:

LL7 (Community Assets): Specify conditions for loss/redevelopment (e.g., demonstrated redundancy, relocation elsewhere, or replacement); include thresholds (e.g., facilities serving <X population or <Y sqm may be considered for alternative use).

LL12 (Infrastructure): A delivery mechanism should be clarified to demonstrate how these priorities can be delivered.

7. Habitats Regulations Assessment (LL10: Chiltern Beechwoods)

Policy LL10 requires financial contributions or Suitable Alternative Natural Greenspace (SANG) provision for all net residential development to mitigate impacts on Chiltern Beechwoods SAC.

The Environmental Report (AECOM, October 2025) and emerging Habitats Regulations Assessment provide sound ecological justification. It should be noted that the Central Bedfordshire Mitigation Strategy for the Chilterns Beechwoods SAC requires contributions towards a CBC strategic SANG for up to and including nine dwellings as one of the mitigation measures. Large sites (10 dwellings and more) are expected to provide their own SANG. The Mitigation Strategy notes that *“while the Council will do all that it can to make the capacity of its Strategic SANGs available to developments, there is currently a limited capacity. Further SANG sites will be sought, but these require agreement from Natural England and so there is no certainty as to when they might come forward.”*

Current Deficiency:

Policy LL5 does not make reference to its potential impacts on the SAC or how it seeks to provide adequate mitigation for the proposed 151 dwellings. There is a significant risk that development within the LLTC neighbourhood plan area will not meet its housing requirements due to being unable to mitigate impacts on the SAC. There is no evidence demonstrating that sufficient SANG is available to enable development within the local area.

Recommended Action:

In light of the significant risk of being unable to appropriately mitigate recreational impacts on the Chiltern Beechwoods SAC with the provision of a bespoke, suitable SANG or with financial contributions to an existing suitable SANG, it is essential that the neighbourhood plan supports development that has potential to provide a bespoke SANG to enable a large-scale development, but also to enable the provision of smaller scale developments (up to 9 dwellings).

Otherwise, there is a realistic risk of effectively a moratorium on development until such mitigation measures can be provided.

The site on land at Southcourt has potential to deliver a mixed-use development with ca 1,800 dwellings, inclusive of a suitably sized area for the provision of SANG that would ensure that both the proposal as well as additional development within the neighbourhood plan area can potentially be provided with sufficient mitigation.

8. Active Travel and Transport Policy (LL11)

Policy LL11 requires development to support bus service improvements, Green Wheel routes, and digital demand-responsive travel (DRT). The policy map further includes specified green wheel routes which indicates areas of improvement.

Evidence Base Support:

Central Bedfordshire Local Transport Plan 3 and emerging strategies support modal shift. However, policy lacks critical detail:

- **No evidence:** No site-specific assessments of suitability, demand and deliverability or indeed accessibility
- **No thresholds:** Applies equally to all development scales.
- **No funding framework:** Unclear how contributions scale or are allocated.
- **No delivery partnerships:** No documented engagement with Stagecoach, CBC Transport, or DRT operators.

Recommended Action:

Revise LL11 to specify:

'Development of [50+ units] should contribute to the following transport priorities in the Leighton-Linslade area, proportionate to transport demand generated:

A Transport Contributions Guidance Note will be prepared by LLTC (in consultation with CBC and Stagecoach) setting out contribution calculation methodology. For schemes below [50 units], developers should demonstrate on-site measures (e.g. cycle storage, EV charging, transit passes).'

Furthermore, the green wheel should be removed from the policy map due to the lack of evidence demonstrating the suitability or need for each of the routes. There is a realistic risk that these routes will undermine potential development where an alternative route is more suitable. The green wheel policies (in text form) are considered to be sufficient, in principle (albeit, not where accessibility is restricted by virtue of private land) and are further supported by Active Travel England and its associated requirements.

9. Climate Change and Energy Policy (LL14)

Policy LL14 imposes stringent sustainability requirements (zero-carbon-ready design, Passivhaus certification, Post-Occupancy Evaluation with remedial works, Whole Life-Cycle Carbon assessments, Climate Change Statements).

Evidence Base Conflict:

The Environmental Report (AECOM, October 2025, Section 6.4.8) acknowledges LL14's climate benefits but does not provide detailed cost-benefit analysis or viability justification. The policy exceeds current 2025 Building Regulations (Future Homes Standard targets 75-80% carbon reduction without mandating Passivhaus).

Viability Concern:

Bailey Venning's July 2025 report already identifies viability constraints on LL5 (negative land values). Imposing blanket LL14 requirements (Passivhaus, universal WLCC, POE-funded remedies) without viability thresholds risks rendering other development sites unviable.

Recommended Action:

Revise LL14 to align with national policy:

'New development (excluding householder extensions) should:

- a) **Energy Performance:** *Meet or exceed Building Regulations Part L (Future Homes Standard) requirements through passive design, renewable energy integration, and fabric efficiency. Passivhaus certification is encouraged but not required as a condition of permission.*
- b) **Whole Life-Cycle Carbon:** *For major developments (50+ units or >2,500 sqm commercial), WLCC assessments (50-year lifecycle) should assess material and energy choices.*
- c) **Post-Occupancy Evaluation:** *Mandatory for major residential schemes (50+ units); methodology and funding source to be agreed at application stage; remedial measures to be addressed through operational management rather than developer liability post-handover.*
- d) **Climate Change Statements:** *Required for major developments, demonstrating alignment with local climate priorities (e.g., flood risk mitigation, green infrastructure, sustainable transport).*

These requirements supplement Building Regulations and shall not apply cumulatively with identical CBC Local Plan requirements. LLTC will liaise with CBC Planning to ensure consistent interpretation.'

10. Basic Conditions Statement and Supporting Evidence

The Neighbourhood Plan defers fuller policy justification to an unpublished Basic Conditions Statement, contravening Regulation 14's transparency purposes.

Deficiency:

Reviewers and objectors lack access to evidence demonstrating compliance with basic conditions general conformity with NPPF, PPG, and CBC policy, proportionality of evidence, viability assumptions.

Recommended Action:

Prepare a detailed Basic Conditions Statement alongside revised Plan text, addressing:

- Each policy's alignment with NPPF and PPG
- General conformity with CBLP (cross-policy matrix as recommended above)
- Proportionality of evidence (e.g. HNA robustness for LL6, viability appraisal for LL5, LGS assessment rigour)
- Sustainability appraisal and Habitats Regulations Assessment compliance

At Regulation 15 submission, publish alongside the Plan:

- Housing Needs Assessment (AECOM) – summary of key findings

- Revised Local Green Spaces Report – addressing evidential gaps
- LL5 Viability Appraisal (summary)
- Strategic Environmental Assessment Non-Technical Summary
- Habitats Regulations Assessment
- Consultation Statement responding to key Regulation 14 objections

11. Summary and Recommendations

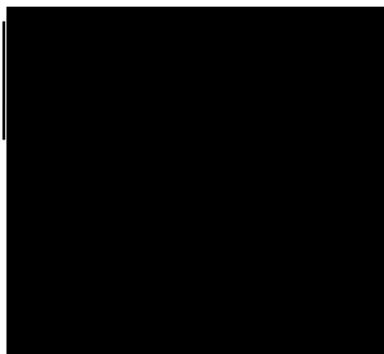
The Leighton-Linslade Neighbourhood Plan exhibits material deficiencies in:

1. **Non-compliance with the NPPF** – inadequate provision of housing supply and restrictive policies against potentially suitable, achievable and available housing sites
2. **Procedural fairness** – inadequate landowner consultation on LGS designations, breaching PPG 37-019
3. **Evidence robustness** – LGS assessments lacking detailed methodology, specialist surveys, and transparent decision-making, housing mix policy (LL6) misaligned with HNA recommendations
4. **Strategic conformity** – unclear alignment to CBLP policies. subjective policy language risking inconsistent application
5. **Deliverability** – LL5 viability challenges unaddressed, infrastructure policies lack proportionality and delivery mechanisms, climate policy (LL14) risks viability impacts without thresholds
6. **Policy clarity** – thresholds, exemptions, and trigger mechanisms absent from multiple policies

Addressing these deficiencies prior to proceeding to Regulation 15 will substantially strengthen Plan soundness, reduce risk of significant required modifications at examination or risk of potential withdrawal, and demonstrate genuine procedural engagement with affected stakeholders.

We would welcome engagement with the Steering Group to discuss these concerns and potential solutions.

Yours sincerely,



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(On behalf of Ascott Nominees Limited and Ascott Farms Limited)