

# RESPONSE TO THE LEIGHTON LINSLADE NEIGHBOURHOOD PLAN LETTER TO CBC RE: POLICY LL5

The Neighbourhood Planning  
(General) Regulations 2012

Land South of High Street,  
Leighton Buzzard

On behalf of the  
Landowner – Central  
Bedfordshire Council



PHASE 2

---

# Quality Assurance

---

<b>Site Name</b>	<b>Land South of High Street, Leighton Buzzard</b>
------------------	--

<b>Our Ref</b>	<b>C25078</b>
----------------	---------------

<b>Client Name</b>	<b>Central Bedfordshire Council</b>
--------------------	-------------------------------------

<b>Type of Report</b>	<b>Response to the Leighton Linslade Neighbourhood Plan Letter to CBC Policy LL5</b>
-----------------------	--

---

<b>Author</b>	<b>Initials</b>	<b>Date</b>
---------------	-----------------	-------------

Samantha Stephenson BA (Hons), MScTP, MRTPI Associate	SS	18 <sup>th</sup> March 2026
---	----	-----------------------------

<b>Reviewed</b>	<b>Initials</b>	<b>Date</b>
-----------------	-----------------	-------------

Matthew Wood BSc (Hons) MScTP MRTPI Director	MW	18 <sup>th</sup> March 2026
--	----	-----------------------------

---

# CONTENTS

## Executive Summary

1. Introduction	3
2. Relevant Legislative Framework and Principles of Policy	7
3. Detailed Comments	10
4. Suggested Modifications	17
5. Conclusions	19

## Appendices

Appendix 1	Site Location Plan
Appendix 2	Annual Monitoring Report (AMR)
Appendix 3	Local Development Scheme January 2025
Appendix 4	Leighton Buzzard Development Briefs: Land South of the High Street March 2012
Appendix 5	Corporate Resources Overview and Scrutiny Committee April 2024
Appendix 6	Sandy Neighbourhood Plan Examiner's Report (February 2026)

---

# Executive Summary

This representation has been prepared by Phase 2 Planning and Development Ltd on behalf of Central Bedfordshire Council (CBC) as majority landowner of *Land South of the High Street, Leighton Buzzard*. It responds to the Leighton Linslade Neighbourhood Plan (LLNP) Steering Group's revised Policy LL5 following the Regulation 14 consultation.

CBC's position is that Policy LL5, even in its revised form, does not meet the statutory Basic Conditions required for a neighbourhood plan. The policy is considered undeliverable, insufficiently evidenced, overly prescriptive, and procedurally flawed, with significant implications for both planning policy and CBC's responsibilities as landowner.

## Key Concerns

### 1. Failure to Meet Basic Conditions

Policy LL5 conflicts with:

- National policy (NPPF) – by constraining sustainable development, predetermining outcomes, and imposing requirements without evidence.
- Local Plan strategic policies – by effectively allocating the site and restricting development contrary to strategic housing and regeneration objectives.
- Sustainable development principles – due to unrealistic infrastructure demands and lack of viability evidence.

### 2. Lack of Required Engagement

The Steering Group did not engage with CBC during preparation of the NP or the Aecom Spatial Framework. This contradicts PPG requirements and Regulation 15(2), which requires evidence of stakeholder engagement. Given the site's scale and strategic importance, this omission is a serious procedural defect.

### 3. Revised LL5 Still Functions as a Site Allocation

Although the formal allocation wording was removed, the revised policy still:

- Defines a "comprehensive regeneration opportunity"
- Prescribes a specific mix of uses
- Requires adherence to a non-statutory Spatial Framework
- Imposes detailed design, heritage, parking, and infrastructure obligations

This is inconsistent with national guidance and recent examiner decisions (e.g., Sandy NP Examiner's Report, Appendix 6), which reject prescriptive, allocation-like neighbourhood plan policies without proportionate evidence.

## 4. Undeliverable Infrastructure Requirements

LL5 requires:

- A health and wellbeing hub
- Cultural and community space
- Extensive active travel and public realm interventions

There is no evidence of commissioning intent, funding, or support from the Integrated Care Board or other partners. Without deliverability evidence, these requirements cannot lawfully be imposed.

## 5. Viability and Flexibility Concerns

CBC notes the site is currently only viable for open market housing, yet LL5 layers on:

- Building retention
- Heritage-led design
- Green/blue infrastructure
- Low-car development
- Multiple community facilities

These cumulative requirements are not viable, undermining sustainable development and conflicting with the Local Plan.

## 6. Impact on CBC's Statutory Functions

The policy:

- Restricts CBC's ability to masterplan the site
- Imposes obligations without evidence
- Creates unrealistic community expectations

This is incompatible with CBC's responsibilities as both landowner.

## CBC's Recommendation

CBC advises that Policy LL5 requires substantial modification to be lawful, deliverable, and evidence-based. If the NP proceeds, LL5 should be rewritten as a flexible, principles-based policy rather than a prescriptive quasi-allocation.

CBC remains open to constructive engagement to develop a workable policy framework for the site.

---

# 1. Introduction

- 1.1 This Representation has been prepared by Phase 2 Planning and Development Ltd on behalf of Central Bedfordshire Council (CBC) as the majority landowner of the subject site at Land South of High Street, Leighton Buzzard (as identified on the site location plan provided as Appendix 1 to this representation). It is submitted in response to the note dated 3rd March 2026 prepared on behalf of Leighton Linslade Neighbourhood Plan Steering Group by Leah Coney concerning Policy LL5 of the Pre-Submission Version of the Leighton Linslade Neighbourhood Plan (Regulation 14). It does not represent the views of CBC in its statutory role as local planning authority.
- 1.2 CBC, as the majority landowner, are responding in accordance with paragraph 1 of Schedule 1 of the Neighbourhood Planning Regulations 2012.
- 1.3 The Leighton Linslade Neighbourhood Plan (LLNP) is subject to two rounds of public consultation, Regulation 14 and Regulation 16, this current response relates to the first round, Regulation 14. The first round (Regulation 14) was undertaken by Leighton Linslade Town Council (LLTC), as the Qualifying Body (QB) and the consultation period ran between Monday 13th October and 30th November 2025.
- 1.4 The first purpose (per Reg 14 (a)) is to inform the public to give them details of the proposed plan and allow them to make representations. The second purpose (per Reg 14 (b)) is to consult any of the statutory consultation bodies that 'may be affected by the proposals' and give them the opportunity to raise concerns or issues that arise in light of their individual statutory duties.
- 1.5 CBC as majority landowner of the subject site took part in the Regulation 14 consultation and submitted their Representation on the 27<sup>th</sup> of November 2025. Following this the Steering Group has reviewed the CBC Representation and as a result has revised and updated Policy LL5 of the Pre-Submission Version of the Leighton Linslade Neighbourhood Plan (Regulation 14) and asked CBC to review this proposed revised wording of Policy LL5.

## Purpose and Structure of this Representation

- 1.6 Neighbourhood plans are not required to meet the tests of soundness which local plans and other development plan documents must meet. Instead, in order for them to be able to be put to referendum, they must meet the 'basic conditions' set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. Those relevant to neighbourhood plans are as follows:
  - (a). having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
  - (d). the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
  - (e). the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
  - (f). the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

(g). prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

1.7 This consultation response aims to highlight where Policy LL5 of the Leighton Linlade NP requires modification in order to be in full conformity with the basic conditions. As confirmed in the Neighbourhood Planning - Planning Policy Guidance (PPG) in Paragraph: 067 (Reference ID: 41-067-20140306), a local planning authority should provide constructive comments on the emerging neighbourhood plan prior to submission and discuss the contents of any supporting documents, including the basic conditions statement. If a local planning authority considers that a draft neighbourhood plan may fall short of meeting one or more of the basic conditions, they should discuss their concerns with the QB in order that these can be considered before the draft neighbourhood plan is formally submitted to the local planning authority.

1.8 This response is made in the spirit of constructive engagement and is considered to be beneficial in identifying any concerns at an early stage and working with LLTC to clarify CBC's policy requirements in respect of the land to the south of the High Street, Leighton Linlade and the Council's Local Plan policy.

## Basic Conditions

1.9 We will briefly expand on the requirements for each basic condition below.

### Point (a)

1.10 A neighbourhood plan must not constrain the delivery of important national policy objectives. The National Planning Policy Framework is the main document setting out the government's planning policies for England and how these are expected to be applied.

### Point (d)

1.11 In relation to point (d) above, as detailed in Paragraph: 072 Reference ID: 41-072-20190509 of the Planning Policy Guidance (PPG) this basic condition is consistent with the planning principle that all plan-making and decision-making should help to achieve sustainable development. A qualifying body should demonstrate how its plan will contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures).

1.12 In order to demonstrate that a draft neighbourhood plan contributes to sustainable development, sufficient and proportionate evidence should be presented on how the draft neighbourhood plan guides development to sustainable solutions. While there is no legal requirement for a neighbourhood plan to have a sustainability appraisal, qualifying bodies may find this a useful approach for demonstrating how their draft plan or order meets the basic condition.

### Point (e)

1.13 With regard to general conformity the PPG (Paragraph: 074 Reference ID: 41-074-20140306) advises that when considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:

- whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with

- the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy
- whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy
- the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach

#### Points (f) and (g)

- 1.14 Points (f) and (g) above relate to certain obligations which plans must adhere to, primarily in relation to habitats and environmental impacts. Some plans require a Strategic Environmental Assessment (SEA) and/or a Habitat Regulations Assessment (HRA).
- 1.15 As detailed in the Strategic Environmental Assessment Screening Determination Statement Leighton Linlade Neighbourhood Plan January 2024, it was determined that the Leighton and Linlade Neighbourhood Plan proposal is likely to result in significant environmental effects and therefore does require a Strategic Environmental Assessment (SEA). In addition, this statement determined that the LLNP is likely to result in significant effects on European sites and consequently the plan does require Habitat Regulation Assessment in order to comply with these basic conditions.
- 1.16 The SEA Framework provided the basis for assessing the LLNP. It consisted of seven SEA themes and related objectives, the 7 themes comprised: Biodiversity; Climate Change including Flood Risk); Community Wellbeing; Historic Environment; Landscape; Land, Soil and Water Resources; and Transportation. Key findings of the SEA were that no significant negative effects were predicted, while minor short-term negative effects may occur during construction these could be managed through good practice. It was also found that the LLNP aligned with other local and regional plans, including the Central Bedfordshire Local Plan and the Chiltern Beechwoods SAC Mitigation Strategy. Minor policy recommendations were made to strengthen the LLNP, including: adding flood mitigation measures for the site allocation; supporting water efficiency and EV charging infrastructure; and including heritage-led design principles for sensitive sites.
- 1.17 Although an HRA has been commissioned by the LLTC this will not be made publicly available until Regulation 16 stage.
- 1.18 Comments are provided below in Section 3 on Policy LL5 which aim to ensure that the policy in its final form is workable and can be implemented to its full effect, ensuring that it contributes to the achievement of sustainable development.
- 1.19 The following comments, observations and suggested amendments have been written to try to identify points which in the author's opinion may not meet the Basic Conditions against which the NP will be assessed. We hope these suggestions will enhance the policy and the plan.
- 1.20 As part of the Regulation 14 Consultation CBC raised some fundamental concerns regarding Policy LL5: Land South of the High Street (and associated Spatial Framework) which is clearly a central pillar of the Plan. The principal concern related to the fact that no evidence of meaningful engagement with CBC as landowner has been made and that the Plan seeks to allocate a parcel of land for a Local Green Space designation where any re-development or development will need to demonstrate exceptional circumstances, yet reasonable alternatives for sustainable development have not been formally considered.

- 1.21 As context, CBC has committed to and undertaken an early review of the adopted Local Plan as set out in Policy SP1a: Partial Review of the Local Plan. The key considerations as part of a review of local plan policies are national policy, housing need, implementation of policies/delivery and changes to local circumstances with implications for spatial strategy. The review was completed in July 2023 and work commenced on preparing a new Local Plan.
- 1.22 CBC report on the effectiveness of the policies in the adopted Local Plan as part of the Annual Monitoring Report (AMR). The latest five year housing land supply statement and methodology for the five-year period commencing 1 April 2025 v4 is attached as Appendix 2 and identifies that the Council can demonstrate 4.85 years supply of deliverable housing sites, however delivery is being closely monitored, and this figure may be subject to change.
- 1.23 CBC has published the Local development scheme January 2025 which includes an indicative timetable for the Local Plan, attached as Appendix 3, but this may be subject to change and review in response to circumstances outside of the Council's control, for example updates to national planning policy and guidance and legislation.

---

## 2. Relevant Legislative Framework and Principles of Policy

- 2.1 Before addressing the policy content of the revised Policy LL5 and its evidence base, we wish to emphasise the relevant legislative framework at both national and local level.
- 2.2 From a planning policy perspective, Neighbourhood Planning is about shaping development of a local area in a positive manner. It is not a tool to be used to prevent development proposals from taking place. It should reflect local and national policies. NP's are not able to promote less development than set out in the Local Plan or undermine its strategic policies. A NP can be used to ensure that any development is in line with the wishes of the local people and is sympathetic to local need. It is important that the plan meets the basic conditions as detailed in paragraph 1.6. above. Furthermore, a NP cannot be utilised to stop development that has already been permitted or identified through the Local Plan.
- 2.3 A neighbourhood plan must not constrain the delivery of important national policy objectives. The National Planning Policy Framework is the main document setting out the government's planning policies for England and how these are expected to be applied.

### **National Planning Policy Framework (NPPF) December 2024**

- 2.4 As detailed above in paragraph 1.11, a NP must not constrain the delivery of important national policy objectives.
- 2.5 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, three overarching objectives are defined in paragraph 8, an economic objective, a social objective and an environmental objective. A NP that does not contribute to sustainable development will not be in accordance with national planning policy and guidance and will automatically infringe point (a) of the basic conditions.
- 2.6 Paragraph 13 of the NPPF is clear that neighbourhood plans should support the delivery of strategic policies contained in local plans and spatial development strategies. Qualifying bodies should plan positively to support local development, shaping and directing development in their area that is outside these strategic policies (Planning Practice Guidance (PPG) Paragraph: 070 Reference ID: 41-070-20190509). More specifically paragraph 30 of the NPPF states that neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.<sup>1</sup>
- 2.7 As advised in the PPG (Paragraph: 076 Reference ID: 41-076-20190509) strategic policies will be different in each local planning authority area, useful considerations include whether the local plan or spatial development strategy identifies the policy as being strategic. Strategic policies on housing provision are considered to be typical strategic policies within the development plan. A prime example would be a policy setting out the overall housing target for a district. Where, in the case of housing or for policies that restrict housing: such as Local Green Space, there are no

---

<sup>1</sup> 17 Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area

“strategic policies” with which to assess conformity of a key policy then the basic condition cannot be met in respect of that policy.

- 2.8 In relation to identifying land for homes, paragraph 74 of the NPPF, states that neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 73a <sup>2</sup>) suitable for housing in their area.
- 2.9 In relation to the designation of land as Local Green Space through the NP process, paragraphs 106-108 are relevant. The NPPF directs at paragraph 106 that 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. Further paragraph 107 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.
- 2.10 Paragraph 132 recognises that neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.

### **Central Bedfordshire Local Plan 2015-2035 adopted July 2021**

- 2.11 The adopted local plan (LP), in paragraph 6.8.1 advises that the Council is supportive of NP’s and support will be given to those communities who choose to produce a NP. Further in paragraph 6.8.2, neighbourhood planning must arise from the community, with individuals and groups working in partnership with local businesses, developers and landowners in the area, to deliver sustainable development to meet the community’s needs for the future.
- 2.12 In paragraph 6.8.4, the LP states that when proposing allocations, a robust assessment of all alternative sites available will be required to show that the most sustainable locations have been selected.
- 2.13 Paragraph 15.14.2 of the LP states that the Council supports the principle of designating Local Green Spaces through Neighbourhood Plans, where a clear and robust methodology consistent with Government guidance has been followed.
- 2.14 In relation to the subject site, the following adopted local policies would be relevant when considering any future proposal for sustainable development :
- SP2: Sustainable Development;
  - SP7: Windfall Development;
  - H1: Housing Mix;
  - H2: Housing Standards;
  - H4: Affordable Housing;
  - R1: Ensuring Town Centre Vitality;
  - R3: Town Centre Development;
  - EE1:Green Infrastructure;

---

<sup>2</sup> 73. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should: a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved

- T2: Highway Safety & Design;
- T3: Parking;
- T5: Ultra Low Emissions Vehicles;
- EE1: Green Infrastructure;
- EE2: Enhancing Biodiversity;
- EE3: Nature Conservation;
- EE13: Outdoor Sport Leisure and Open Space
- CC1: Climate Change and Sustainability;
- CC3: Flood Risk Management;
- CC5: Sustainable Drainage;
- HQ1: High Quality Development;
- HQ2: Developer Contributions;
- HQ3 Provision for Social and Community Infrastructure;
- HQ5: Broadband and Telecommunications Infrastructure;
- HQ8: Back-land Development; and
- HE3: Listed Buildings, Conservation Areas & Built Heritage.

---

## 3. Detailed Comments

- 3.1 The landowner's response relates specifically to the proposed revised policy wording of Policy LL5 and whether the draft Policy meets the basic conditions for Neighbourhood Plans as outlined in Section 1 and where relevant with specific reference to the subject site at 'Land South of High Street', Leighton Buzzard.
- 3.2 The PPG advises that a policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared (paragraph: 041 Reference ID: 41-041-20140306).

### Consultation

- 3.3 CBC, as landowner of the majority of Land South of the High Street, Leighton Buzzard, has a direct and material interest in the future of the site. Despite this, prior to the receipt of the Note dated 3<sup>rd</sup> March 2026, neither the NP nor the associated Aecom Spatial Framework Report (March 2025) demonstrate any meaningful engagement with CBC during the preparation of the NP. No evidence has been provided of meetings, discussions, or correspondence with CBC, nor is there clarity on how CBC's interests were taken into account.
- 3.4 Paragraph 019 of the PPG advises that the qualifying body "should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan."
- 3.5 The prior failure of the QB to engage in any detailed discussions with CBC as landowner is a fundamental flaw to the NP. However, CBC welcomes the opportunity given now to engage with the Steering Group regarding proposed Policy LL5.
- 3.6 This prior omission to engage is contrary to Regulation 15(2) of the Neighbourhood Planning Regulations, which requires a Consultation Statement to summarise issues raised by stakeholders and explain how they were addressed. The prior failure to evidence consultation with the site's landowner represents a significant procedural defect. It undermines transparency, reduces the credibility of the process, and risks non-compliance with the statutory requirements for neighbourhood plan preparation.
- 3.7 The previous lack of engagement is especially concerning given the central role of the subject site at Land South of the High Street, Leighton Buzzard in the NP's spatial strategy. A site of this scale, complexity, and sensitivity cannot be planned for without direct dialogue with the landowner.
- 3.8 Notwithstanding the above, as detailed in paragraph 2.1 above, CBC as landowner is currently in the process of forming its own plans for the site as detailed in the documents attached as Appendices 4 & 5. The NP as proposed would hinder this process.

## Revised Policy LL5: Land South of the High Street (and associated Spatial Framework)

3.9 The revised wording for Policy LL5 has been reviewed in the context of the adopted Local Plan, national policy, and the statutory Basic Conditions that neighbourhood plans must meet.

3.10 The Pre-Submission draft policy wording was as follows:

*"The Neighbourhood Plan allocates approximately 2.65 hectares of land to the south of the High Street, as shown on the Policies Map, for a comprehensive, mixed-use development including cultural and community facilities and up to 151 dwellings; the residential element comprising a mix of 1- and 2- bedroom apartments as set out in the "Land South of High Street Spatial Framework" (Appendix B) Development proposals will be supported where they meet the following objectives:*

*A) They deliver key community facilities, particularly supporting health, cultural and small business, and particularly a new Neighbourhood Health Centre following new government policy,*

*B) Re-use and repurpose existing buildings to bring them back into use where possible.*

*C) Connect the High Street through to Parsons Close Recreation Ground providing greater flow of people between two key community assets,*

*D) Promote active travel and provide genuine alternatives to car ownership including provision of car and cycle clubs, cycle parking, pedestrian focused walking routes with regular seating to enable mobility-impaired local residents to walk through the area (exceeding the standards in the healthy streets initiative)*

*E) Continue to provide an appropriate level of public parking required for the town centre and enabling market traders to continue to frequent the twice weekly market,*

*F) Residential development is targeted on the opportunities for living, shopping and working locally, including opportunities for younger residents and older persons in assisted living.*

*G) Complements the existing town centre architecture and layout, and the neighbouring Parsons Close Recreation Ground."*

3.11 Following CBC's response (and other statutory consultees) to the Regulation 14 consultation, the policy has been updated as follows:

*"The Neighbourhood Plan identifies approximately 2.65 hectares of land to the south of the High Street, as shown on the Policies Map, as a comprehensive regeneration opportunity for a town centre mixed-use development.*

*Development proposals will be supported where they:*

*A) Deliver a mixed-use scheme comprising housing and town centre uses, including cultural, community, health, employment and leisure uses appropriate to a primary town centre location.*

*B) Demonstrate how they have been informed by, and responded to, the "Land South of High Street Spatial Framework" (Appendix B)*

*C) Provide key community infrastructure identified in Policy LL11 (Infrastructure Priorities), including provision for a health and wellbeing hub and flexible community and cultural space, unless it can be demonstrated that equivalent provision is available elsewhere within the town centre.*

*D) Are heritage-led in approach, conserving and enhancing the significance of designated and non-designated heritage assets, including the setting of listed buildings and the character and appearance of the Leighton Buzzard Conservation Area.*

*E) Demonstrate high quality design that:*

*i) Responds positively to historic plot patterns, scale, massing and ridge lines;*

*ii) Reinforces the historic High Street grain;*

*iii) Preserves key views and visual connections;*

*F) Retain and reuse existing buildings where viable and where their retention contributes positively to character, sustainability and townscape quality.*

*G) Improve permeability by creating strong pedestrian and cycle connections between the High Street and Parsons Close Recreation Ground, enhancing east-west movement and public access.*

*H) Apply a vision-led approach to transport, providing genuine alternatives to car ownership for future residents and visitors:*

*i) Prioritising walking, wheeling and cycling;*

*ii) Providing high quality cycle parking and active travel infrastructure;*

*iii) Demonstrating safe and convenient access to public transport; and*

*iv) Designing streets and spaces to reduce reliance on private car use.*

*I) Provide town centre public parking only as required to support the vitality and viability of the High Street and market function. Residential parking provision should reflect the highly accessible location and accord with local parking standards. Low-car development will be supported where proposals demonstrate appropriate mitigation of off-site parking impacts.*

*J) Protect and enhance water quality within the River Ouzel catchment and demonstrate compliance with relevant Local Plan and Environment Agency requirements, including buffer zones and pollution prevention measures.*

*K) Integrate high-quality green infrastructure within the layout, including:*

*i) Usable public open space;*

*ii) Urban greening and tree planting;*

*iii) Biodiversity enhancement measures; and*

*iv) Connectivity with the wider Green and Blue Infrastructure Network."*

3.12 While the Steering Group's intention to reflect community aspirations for the site is recognised, the revised LL5 wording raises significant concerns relating to policy scope, deliverability, viability, evidence base, and legal compliance. These concerns must be addressed to ensure that the Neighbourhood Plan can proceed to examination and that the policy does not prejudice the Council's statutory planning functions or its responsibilities as landowner.

- 3.13 In support of this response, CBC attaches Appendix 6: Sandy Neighbourhood Plan Examiner's Report (February 2026). This recent report provides clear and relevant evidence of how an independent examiner has treated similar issues within the same local authority area, including:
- the need for proportionate evidence
  - the limits of neighbourhood plan powers
  - the importance of deliverability and viability
  - the treatment of non-statutory frameworks
  - the need to avoid prescriptive or undeliverable requirements.

#### Policy Approach

- 3.14 The Steering Group accepts that the previous allocation cannot be retained because "*the site would currently only support open market housing*". Despite this, the revised LL5 wording continues to operate as a quasi-allocation, defining the site as a "*comprehensive regeneration opportunity*" and prescribing a detailed and directive development outcome.
- 3.15 This approach is inconsistent with national guidance and with recent examiner reasoning. As demonstrated in the Sandy Examiner's Report (Appendix 6), examiners reject prescriptive, inflexible site policies and will not support neighbourhood plan policies that:
- predetermine the form or mix of development
  - impose allocation like requirements without evidence
  - constrain future masterplanning or viability testing

- 3.16 The LL5 wording must therefore be reframed to avoid implying allocation status.

#### Lawful Scope of a NP

- 3.17 The revised LL5 policy explicitly links to Policy LL11 (Infrastructure Priorities) and imposes obligations that neighbourhood plans cannot require unless supported by proportionate, site specific evidence and consistent with strategic policy. These include:
- mandatory provision of a health and wellbeing hub
  - mandatory cultural and community space
  - prescriptive design parameters (plot patterns, ridge lines, key views)
  - requirements to retain existing buildings
  - restrictions on public parking and expectations for low car development
  - detailed green and blue infrastructure specifications
- 3.18 This introduces specific infrastructure obligations that may not be viable or deliverable. The Sandy Examiner's Report provides clear precedent that such requirements are beyond the remit of a neighbourhood plan. The examiner emphasised the need for:
- proportionate evidence
  - flexibility
  - alignment with strategic policy
  - avoidance of prescriptive detail
- 3.19 The LL5 wording does not meet these tests.

### Deliverability and viability concerns

- 3.20 The Steering Group acknowledges that the site is currently only viable for open market housing. Despite this, the revised LL5 wording requires:
- multiple community facilities
  - extensive public realm and active travel infrastructure
  - building retention
  - heritage led design
  - green infrastructure enhancements
- 3.21 These obligations are not deliverable based on the viability evidence available.
- 3.22 The Sandy Examiner's Report reinforces that neighbourhood plan policies must be capable of implementation, be deliverable and supported by proportionate evidence. Policies that impose undeliverable requirements fail the Basic Conditions.
- 3.23 The PPG advises that a policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared (Paragraph: 041 Reference ID: 41-041-20140306).
- 3.24 CBC as landowner considers that it is essential that this evidence is provided in order to inform the production of a NP that is better placed to provide for sustainable development which benefits the local community whilst avoiding placing unrealistic pressures on the cost and deliverability of that development.
- 3.25 Without such evidence, Policy LL5 is not aligned with national guidance, which requires neighbourhood plan policies to be underpinned by proportionate and robust evidence.

### Health infrastructure requirement is unsupported and undeliverable

- 3.26 CBC has a specific and serious concern regarding the requirement for a "health and wellbeing hub".
- 3.27 There is no evidence of engagement, support or commissioning intent from the Integrated Care Board (ICB). At present:
- the ICB has not identified a need for new primary care floorspace on this site
  - no capital or revenue funding has been identified
  - no business case or commissioning plan exists
  - no formal expression of support has been provided
- 3.28 Requiring a health hub as a specific infrastructure obligation in these circumstances is not justified, not viable, and not deliverable.
- 3.29 The Sandy Examiner's Report provides strong support for this position. The examiner emphasised that neighbourhood plan policies must be based on:
- demonstrable need
  - realistic delivery mechanisms
  - evidence of funding
  - engagement with delivery bodies

- 3.30 The LL5 requirement for a health hub fails all of these tests.
- 3.31 Any reference to health infrastructure must therefore be framed as an aspiration only, not a policy requirement.

#### [Status of the Spatial Framework](#)

- 3.32 The revised policy requires applicants to *“demonstrate how they have been informed by, and responded to, the Spatial Framework”*. This wording elevates an untested, unadopted document to a status that is not appropriate in planning policy terms.
- 3.33 The Sandy Examiner’s Report rejects reliance on non statutory frameworks and reinforces that neighbourhood plans cannot give determinative weight to non-statutory frameworks or advisory documents.
- 3.34 The LL5 wording must be amended to reflect this.

#### [Duplication and conflict with strategic policy](#)

- 3.35 The revised LL5 wording duplicates significant elements of the Local Plan, including:
- heritage policy
  - design policy
  - transport and parking policy
  - biodiversity and green infrastructure policy
- 3.36 Neighbourhood plans should not repeat or reinterpret strategic policy. The Sandy Examiner’s Report confirms that such duplication is inappropriate and risks conflict with the Basic Conditions

#### [Impact on CBC’s statutory functions and landowner responsibilities](#)

- 3.37 As planning authority, CBC must ensure that neighbourhood plan policies are sound, deliverable and consistent with the development plan. As landowner, CBC must retain flexibility to respond to market conditions, viability evidence and future masterplanning.
- 3.38 The revised LL5 wording constrains both roles by:
- predetermining the development mix
  - imposing obligations without evidence of deliverability
  - restricting design and layout options
  - requiring specific infrastructure without funding or viability justification

- 3.39 This is not compatible with the Council’s statutory responsibilities. NP’s must not frustrate strategic policies or impose undeliverable requirements.

- 3.40 The revised policy imposes fixed expectations that may:

- reduce land value
- deter development partners
- create obligations CBC cannot commit to
- undermine future masterplanning

- 3.41 This is particularly problematic given the Steering Group’s stated aim to *“resolve the tension... between the community vision... and the commercial reality of asset disposal by CBC”*.

### Policy risks raising community expectations that cannot be met

3.42 The Steering Group wants a policy that will be:

*"supported at referendum and have functional weight post adoption"*

3.43 However, if the policy promises:

- a health hub
- cultural space
- extensive public realm
- low car development
- building retention

without any guarantee of deliverability, this risks misleading the community and creating future conflict when development proposals cannot meet these expectations.

### Policy may prejudice future planning applications

3.44 By setting out a long list of requirements, the policy risks creating grounds for refusal that are not supported by strategic policy, forcing applicants to produce unnecessary evidence, creating uncertainty for developers and undermining the flexibility needed for town centre regeneration

3.45 This is contrary to the NPPF's emphasis on flexible, enabling policy for brownfield regeneration.

### Summary

3.46 To be capable of meeting the Basic Conditions, Policy LL5 must be reframed as a flexible, principles based policy that:

- recognises the site's potential without implying allocation
- aligns with Local and National Plan policy
- avoids prescriptive or undeliverable requirements
- treats the Spatial Framework as non binding
- supports community aspirations only where viable and evidence based
- provides sufficient flexibility for future masterplanning and disposal

3.47 CBC has prepared alternative wording that meets these requirements and would provide a sound basis for inclusion in the Submission Plan.

---

## 4. Suggested Modifications

- 4.1 To amend the policy so that that it might be found capable of meeting the Basic Conditions, suggested amendments are made below.

### Policy LL5: Land South the High Street

1. Land South of the High Street, as shown on the Policies Map, is recognised as a potential opportunity for future regeneration within the town centre. Proposals will be supported where they deliver a high quality, mixed use development appropriate to a primary town centre location. Any proposals will be determined in accordance with the adopted development plan, national policy and proportionate technical evidence.

2. Development proposals should have regard to the Land South of High Street Spatial Framework as a non statutory expression of community aspiration, while recognising that applications will be determined in accordance with the development plan and proportionate technical evidence.

3. Proposals will be supported where they demonstrate compliance with the following principles:

a. *Appropriate mix of uses*

Development should provide a mix of uses appropriate to a primary town centre location. This may include residential, retail, community, cultural, leisure or employment uses, where consistent with the Local Plan and supported by proportionate evidence of viability and deliverability.

b. *Heritage and townscape*

Proposals must conserve and enhance the significance of designated and non designated heritage assets in accordance with national and Local Plan policy. Heritage assessment should be proportionate to the asset's significance and the scale of development.

c. *Design quality*

Development should deliver high quality design that responds positively to the site's town centre context, including scale, massing and layout..

d. *Movement and access*

Proposals should improve pedestrian and cycle connectivity within and around the site, including opportunities to enhance links between the High Street and Parsons Close Recreation Ground where feasible and deliverable. Access arrangements must be informed by proportionate transport assessment.

e. *Sustainable travel*

Development should support sustainable travel in accordance with Local Plan policy, including safe and convenient access for walking, cycling and public transport.

f. *Parking*

Parking provision should reflect the site's highly accessible town centre location and accord with Local Plan standards. Any public parking provision must be justified by evidence of operational need.

g. *Green infrastructure and biodiversity*

Proposals should incorporate green infrastructure and biodiversity enhancements proportionate to the scale and nature of development and consistent with Local Plan requirements.

#### *h. Deliverability*

*Proposals must demonstrate deliverability, including how any community uses or public realm improvements will be funded and phased. Requirements for community infrastructure will only be supported where they are viable, evidence based and consistent with strategic policy.*

*4.The Neighbourhood Plan supports opportunities for community, cultural or health related uses on the site where these can be demonstrated to be viable, deliverable and supported by the relevant commissioning bodies. The policy does not require such uses where they cannot be justified by proportionate evidence.*

## Summary

4.2 These suggested modifications would:

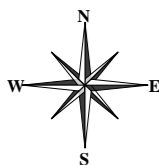
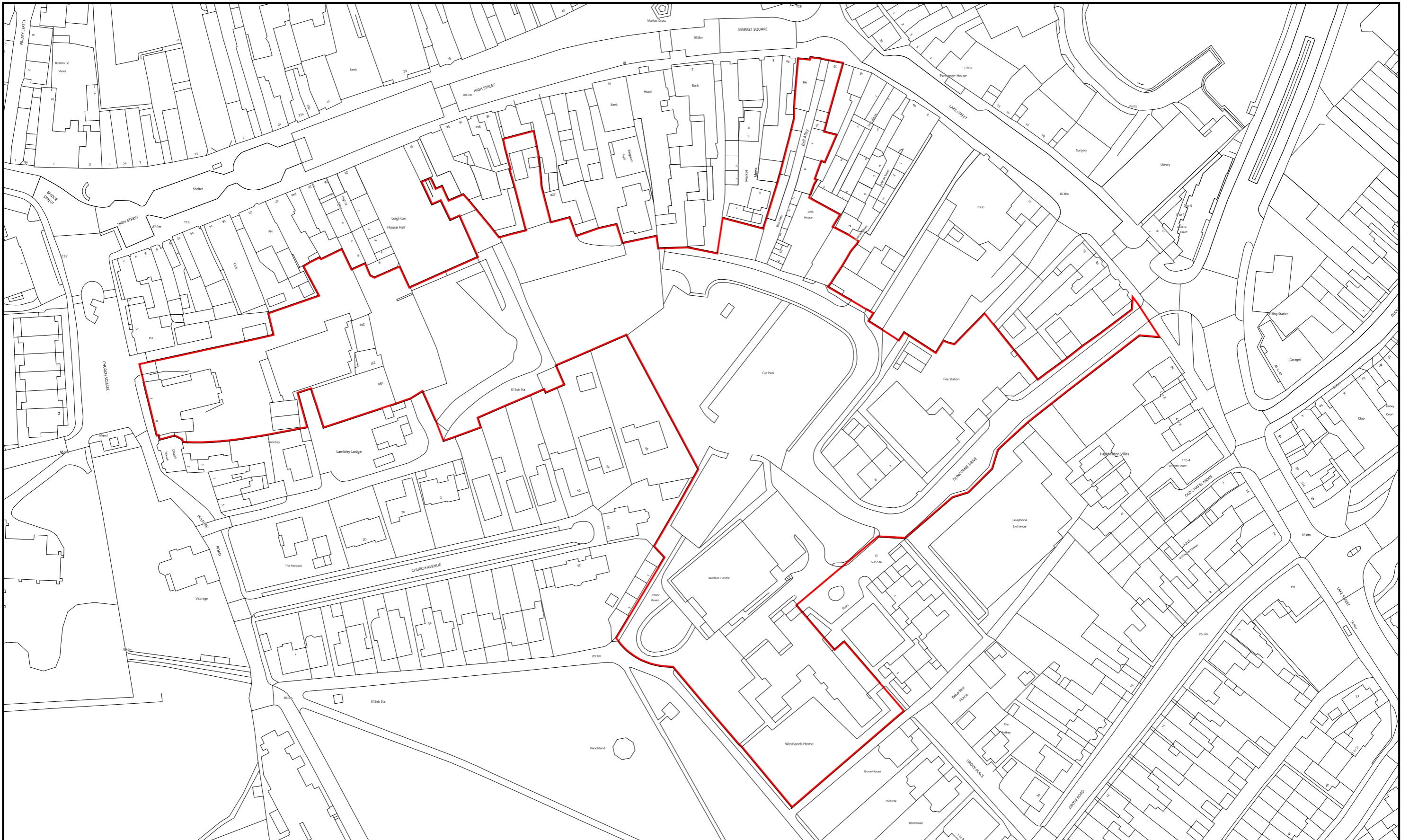
- Bring Policy LL5 into line with NPPF requirements for sustainable development and viability.
- Ensure Policy LL5 is flexible, evidence-led, and viable.
- Prevent LL5 from blocking reasonable alternatives for housing or mixed-use development.
- Bring the policy into alignment with the NPPF basic conditions and Local Plan conformity tests.

---

## 5. Conclusions

- 5.1 Phase 2 Planning act on behalf of Central Bedfordshire Council in its capacity as majority landowner of the Land South of the High Street, Leighton Buzzard. This response to the Steering Groups letter dated 3rd March 2026 identifies significant legal and policy concerns with the draft Policy LL5.
- 5.2 In particular, Policy LL5 Land South the High Street has been prepared without proportionate evidence, without meaningful engagement with the landowner, and in a manner that conflicts with national and local planning policy. These policies are overly restrictive, undeliverable in practice, and risk preventing the sites from making a meaningful contribution to housing, community, and sustainable development objectives.
- 5.3 The lack of a robust evidence base and failure to consider viability and reasonable alternatives means that the Policy, in its current form, does not meet the statutory basic conditions – specifically conditions (a), (d) and (e).
- 5.4 The proposed policy has been produced on such a legally flawed basis, without regard to national policy and the relevant legal framework, that it raises fundamental obstacles to the lawful progress of the draft Neighbourhood Plan
- 5.5 CBC as landowner therefore respectfully requests that:
- The Town Council, as a qualifying body, properly exercising their statutory duty under paragraph 3 of Schedule 4B of the Town and Country Planning Act place the progression of the NP on hold. This will allow the baseline evidence base to be gathered and further engagement with stakeholders, including CBC as the landowner to take place, allowing a robust NP to then be pursued which will meet the needs of the Town for the full plan period.
  - If the NP does proceed, then Policy LL5 Land South the High Street (and associated Spatial Framework) and any other identified component parts, which directly impact on the subject sites should be deleted or be subject to extensive modification through textual addition and deletion under paragraph 10 of Schedule 4B to the Town and Country Planning Act.
  - Policy LL5 is substantially modified to provide a flexible, evidence-led and viable framework that allows for mixed-use development.
- 5.6 Unless these modifications are made, the Neighbourhood Plan cannot be found capable of meeting the basic conditions and should not proceed to Regulation 16 in its current form. CBC as landowner remains committed to constructive dialogue with the Qualifying Body to secure modifications that will enable a lawful, deliverable, and community-focused Plan.





Date: 14 November 2025

Scale 1:1250 @ A3  
EM 4944

## Leighton Linslade Neighbourhood Plan Demise: Land South of High Street Leighton Buzzard Town Centre

© Crown Copyright and database right. 2025  
Ordnance Survey 100049029.  
Central Bedfordshire Council.

Cities Revealed aerial photography copyright  
The GeoInformation Group, 2010





# **Five year housing land supply statement and methodology**

For the five-year period commencing 1<sup>st</sup> April 2025 v4

**A great place to live and work.**

## Housing completions summary (net figures)

Number of homes (inc. care homes) completed since 01/04/2015	= <b>21,243</b>
Number of dwellings completed in Quarters 3 & 4, 2024/25	= <b>702</b>
Estimated number of new starts in Quarters 3 & 4, 2024/25	= <b>787</b>
Care home completion (homes released) in Quarters 3 & 4, 2024/25	= <b>20</b>
Number of homes under construction at 31/03/2025	= <b>1,973</b>

**Table 1: Annual housing completions**

Monitoring year	Dwelling completions (net)	Care home completions – homes released
2015/16	1,626	78
2016/17	1,773	-11
2017/18	2,103	39
2018/19	2,102	79
2019/20	2,622	68
2020/21	2,135	0
2021/22	2,422	46
2022/23	2,314	73
2023/24	2,120	3
2024/25	1,610	41
<b>Sub TOTAL</b>	<b>20,827</b>	<b>416</b>
<b>TOTAL</b>	<b>21,243</b>	

## Requirement

### Local Plan requirement

The Central Bedfordshire Local Plan 2015-2035 was adopted on 22<sup>nd</sup> July 2021 and has a housing requirement of 39,350 over the 20 year period. This is equivalent to 1,967.5 per year and is used as a basis to calculate the authority's five-year supply requirement.

### Five-year requirement

During the 10 year period from **1<sup>st</sup> April 2015 to 31<sup>st</sup> March 2025** a total of 21,243 (net) homes were completed (and released through care homes completions) within Central Bedfordshire. This is a surplus of 1,568 dwellings when assessed against what was needed to be provided during that period. The calculation is as follows:

$$1,967.5 \text{ multiplied by } 10 \text{ (years)} = 19,675$$

$$21,243 \text{ minus } 19,675 = 1,568$$

The level of housing completions which have been recorded for the Housing Delivery Test, demonstrate that there has been no 'significant under delivery'. A buffer of 5% should therefore be added to the five-year requirement as per paragraph 78 of the National Planning Policy Framework (NPPF) December 2024.

$$39,350 \text{ minus } 21,243 = 18,107 \text{ (homes remaining)}$$

$$18,107 \text{ divided by } 10 \text{ (years remaining)} = 1,810.7$$

$$1,810.7 \text{ multiplied by } 5 \text{ (years)} = 9,053.5$$

$$9,053.5 \text{ plus } 5\% \text{ buffer} = 9,506$$

Between 1st April 2015 and 31<sup>st</sup> March 2025, a total of 20,827 net new dwellings have been completed in Central Bedfordshire. A further 416 homes have been released by the delivery of care home bed spaces. The remaining requirement between 1st April 2025 and 31 March 2035 is 18,107 homes. This means that over the remaining 10 years of the Local Plan period, an average of 1,811 new homes will be required per year, or 9,054 over the five-year supply period. When the 5% buffer is applied, the five-year requirement is 9,506.

## Supply

### The Housing Trajectory & Methodology

The [Housing Trajectory](#) is available on the Council's website and has been updated for 1<sup>st</sup> April 2025. It is updated regularly and provides information on sites that are either allocated for housing development, have planning permission or are sites which have a strong expectation of being granted permission. These are concluded as being either deliverable or developable at the relevant base date of the trajectory (e.g. 1<sup>st</sup> April 2025) in conformity with the glossary of the NPPF.

All sites of 10 or more dwellings are assessed individually and are placed in the Trajectory and adjusted according to the most up-to-date information available. The deliverability of these sites is reviewed each time the trajectory is updated.

### **Site surveys**

If a site has detailed planning approval it is surveyed to record: a) if groundworks have commenced, b) the number of dwelling completions, c) the number of plots under construction and d) the pace of delivery. These surveys involve site visits, discussions with sales officers and desk-based cross referencing with NHBC and Building Control reports. The information gathered is then used to update and adjust the delivery numbers in the trajectory.

### **Information from developers**

Site promoters and developers are contacted regularly for delivery information. They are mostly contacted regarding sites where housing delivery has not commenced, and additional information is needed. They are asked to complete delivery proformas detailing their expected timetable for development, build rates, date of submission of applications, progress that has been made to date, number of house builders and barriers to development etc.

### **Planning status and progress of applications**

Information on the progress of applications is also examined to help determine whether a site is deliverable or developable. This information may include:

- Progress towards the signing of the S106 agreement.
- Work towards submitting a reserved matters application.
- Progress of development briefs, design guides and area plans etc.
- Submission and discharge of conditions.
- Site assessment work.
- Timescales agreed within Planning Performance Agreements (PPAs)

### **Critical appraisal**

All the above information is reviewed and appraised by monitoring officers before a decision is made over where to place each site within the Trajectory. This is often done in consultation with individual case officers.

House builders work to set timescales and have specific targets to make. Therefore, their estimates of delivery are often realistic and robust, and it is the Council's experience that they can be relied upon in most cases. There are, however, circumstances where a delivery timetable may appear too ambitious. For example, if work on an application has slowed or further assessments are needed, the Council will adopt a conservative approach and may revise the trajectory accordingly by moving back the first date of delivery. This is usually carried out following discussions with the case officer to determine a realistic timescale. Similarly, annual build rates may occasionally be adjusted down if, for example, they are considered to be too ambitious for the number and nature of housebuilders on site.

Where site-specific information is not available, average lead in times and build out rates are applied if they are appropriate. If clear evidence of deliverability cannot be demonstrated for a particular site, it is placed outside of the five-year supply period.

## Lead-in times

The average lead-in times were reviewed in April 2024 and were calculated for all sites in the Trajectory where dwellings have been completed. These averages are used as a guide when assessing the delivery timescales of sites where site-specific delivery information is not available.

**Table 2: Lead-in times**

Site size	Average lead in times for OUTLINE applications from the date of approval to first recorded completion (months)	Lead in times for FULL applications from the date of approval to the first completion (months)	Lead in times for RM applications from the date of approval to first completions (months)
10-50	32	27	19
51-100	37	24	15
101-200	43	32	15
201-500	No sample	No sample	14
500+	56 <sup>1</sup>	No sample	13
<b>Mean average</b>	<b>41</b>	<b>27</b>	<b>16</b>
<b>Median average</b>	<b>36</b>	<b>25</b>	<b>13</b>

The Council acknowledges the Lichfields research in 'Start to Finish' (March 2024) and accepts that it can provide useful insight into delivery trends at a national level where local data is not available. There is a good degree of consistency between the Council's delivery rate conclusions and those presented by Lichfields, which supports the Council's approach, but the Council principally applies its own methodology as explained in this document. This is because (amongst other reasons): (1) the Lichfield's research primarily focuses on 500+ dwelling sites, whereas there is strong delivery on sites of less than 500 dwellings in Central Bedfordshire; (2) the Lichfield's research contains very little analysis of sites in Central Bedfordshire (only 4 are considered) and limited analysis of sites in adjoining areas (for example, only 4 sites in Bedford Borough are considered); and (3) there are inaccuracies in respect of the cross boundary Wixams development<sup>2</sup>. It is therefore preferable to use fine grained local data that characterise the trends experienced in Central Bedfordshire.

Furthermore, the application of data derived from Central Bedfordshire is justified because the area benefits from a unique combination of characteristics which facilitate housing delivery. These characteristics include:

---

<sup>1</sup> Lead-in times for the Wixams have been removed from the calculation of this average as it is a unique cross-boundary development and first completions were within Bedford Borough.

<sup>2</sup> The 4,500 home Wixams development crosses the administrative boundary of Central Bedfordshire and Bedford Borough. The data for the Wixams in the appendix to 'Start to Finish' (March 2024) only includes the annual housing delivery experienced in Bedford Borough. This is inaccurate.

- Available land is predominately greenfield.<sup>3</sup>
- Buoyant and competitive housing market – demonstrated by a higher-than-average affordability ratio.
- Large range of national and Small and Medium Enterprise (SME) developers operating in the area.
- Large range of active registered providers.
- Attractive area with excellent road and rail connections.
- An up-to-date Local Plan which provides a positive planning framework, including a policy requirement for 30% + affordable housing delivery.<sup>4</sup>

## **Build rates**

The Council published build rate information in the Matter 10 paper that was produced for the Local Plan examination. The average annual build rates for different site sizes were calculated and used to estimate the delivery of proposed allocations and other commitments. The averages do not include the delivery from the first and last years of development as these are often lower and do not represent a full year of delivery. If first and last years were used, this would result in a downward skewing of rates that are applied to the middle years of delivery. This approach was accepted by the Inspector and remains applicable. The figures in the table below are for individual Full and Reserved Matters applications and were revised in April 2025. They have been used as a guide to inform build rates for those sites in the Trajectory where site-specific information is not available.

---

<sup>3</sup> A factor which is acknowledged to speed up delivery – see ‘Start to Finish’ (March 2024) at PDF p. 12.

<sup>4</sup> Another factor which is acknowledged to speed up delivery – see ‘Start to Finish’ (March 2024) at PDF p. 19. See Policy H4 of the Central Bedfordshire Local Plan.

**Table 3: Build rates**

Site size	Average number of completions per full year	Rounded to nearest 5 dwellings
10-20	Completed in 1-2 years	Completed in 1-2 years
21-50	21	20
51-100	40	40
101-200	51	50
201-500	62	60

It is acknowledged that large national bulk house builders are often capable of delivering in excess of these averages. In these instances, build rates may be altered to better reflect the expected pace of development.

Assessing the delivery of sites on an individual basis remains the most appropriate and robust approach to calculating five-year housing land supply. This is because site delivery can vary significantly depending on the housebuilder, the number of housebuilders, type and location of site and the methods of construction etc.

### **Lapse rate**

A lapse rate/non-delivery rate is not applied to sites of 10 or more dwellings as changes are made on a site-by-site basis each time the Trajectory is updated. This position is supported by; a) monitoring records which show that very few sites of this scale fail to deliver; b) the high proportion of sites in the trajectory that are already under construction; and c) the possibility that delivery for individual sites can often move forward in the trajectory and not back.

A conservative 10% lapse rate/non-implementation rate is however applied every year to sites under 10 dwellings. This is because these are grouped together in the trajectory and are therefore not assessed individually. Due to the high volume of approved applications in Central Bedfordshire, this is the most efficient and effective way of projecting completions from this source. A list of all these sites is available on request and details of the methodology for the lapse rate and windfall allowance can be found in the Council's [Windfall Topic Paper](#) .

## Windfall Allowance

The figures contained in the table below are the annual windfall completions since 2015/16.

**Table 4: Annual windfall completions (net new dwellings)**

Monitoring Year	Net windfall completions on small sites (less than 10 dwellings)	Net windfall completions on large sites (10 dwellings or more)
2015/16	255	256
2016/17	286	503
2017/18	269	727
2018/19	250	915
2019/20	232	1,328
2020/21	286	691
2021/22	165	987
2022/23	171	760
2023/24	120	797
2024/25	188	433 <sup>5</sup>
<b>Annual average</b>	<b>222</b>	<b>740<sup>6</sup></b>

### Small sites

The figures in Table 4 demonstrate that the annual windfall allowance proposed by the Windfall Topic Paper of a maximum of **140** a year for small sites, remains conservative. This figure was chosen as it is significantly lower than the annual average and ensures that there is not an over reliance on the allowance within the five-year supply. The Windfall Topic Paper is scheduled to be updated to inform the Local Plan review. In the meantime, the figure of 140 will continue to be used for small sites. It is important to note that an allowance is not made to those years where the expected delivery from committed small windfall sites exceeds 140 dwellings. At 1<sup>st</sup> April 2025, 565 dwellings on small sites benefitted from planning permission and 207 of these were under construction.

### Large sites

The Windfall Topic Paper did not recommend an allowance for sites over 10 dwellings. This is due to there being no case for one at the time the paper was published. Recent completion data has however identified that large windfall sites have continued to be a reliable source of supply in Central Bedfordshire.

---

<sup>5</sup> Figure revised on 20.06.2025

<sup>6</sup> Figure corrected on 26.06.2025

Figures in Table 4 show that the annual average number of dwellings built on large windfall sites since the beginning of the Plan period is 740. It is therefore proposed that, in advance of the publication for the revised Windfall Topic Paper, a large site windfall allowance is added to the five-year supply which is capped at the lowest completion figure achieved since 2015. For simplicity, an annual allowance of **250** (significantly lower than the expected annual delivery from this source) will be added to the five-year supply. Deductions will be made for committed large windfall sites, and an allowance will not be applied to those years where the expected delivery from these committed sites exceeds 250. The April 2025 trajectory makes an allowance of 161 additional dwellings to be provided on large windfall sites within the five-year supply period.

## **Older people's housing**

The Government's guidance on Housing Supply and Delivery states that '*Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply.*' This contribution towards supply should be based on the amount of accommodation released into the housing market. The guidance on Housing for Older and Disabled People explains that authorities should '*base their calculations on the average number of adults living in households, using the published Census data*'. To align with the revised Housing Delivery Test Measurement Rule Book, a ratio of 1:1.9 has been applied to bed spaces provided in communal C2 accommodation since April 2024. This means that for every 1.9 bed spaces, one dwelling is released back into the housing market. Work has been undertaken to identify all C2 care home developments that have been completed since the beginning of the plan period.

Extra care dwellings are very different to residential care homes. All extra care schemes included within the supply are self-contained dwellings where older people can live independent lives within their own private homes. They are usually a collection of individual private apartments, often with more than one bedroom, and should not be confused with bedspaces in care homes. It is sensible and right to conclude that when people move into extra care housing, their previous homes will be released onto the market on a one for one basis. Therefore, the above ratio does not apply to these schemes.

## **Student Accommodation**

The Housing Supply and Delivery planning practice guidance states that:

*'All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply based on:*

- *the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or*
- *the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.*

*This will need to be applied to both communal establishments and to multi bedroom self-contained student flats. Several units of purpose-built student accommodation may be needed to replace a house which may have accommodated several students.*

*Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published census data, and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling.’ (Department for Levelling Up, Housing and Communities 2019)*

This guidance suggests that the above bulleted tests do not apply to self-contained studio flats. This position is supported by the Housing Delivery Test measurement rule book which provides the calculation for the above. Studio flats are not considered to be communal accommodation and are included in the Net New Dwellings official statistic on a one for one basis.

To present a conservative supply position, the Council has not sought to include any multi-bedroom self-contained student flats (cluster flats) within the five-year supply calculations. In 2021/22 a net total of 412 bed spaces were provided in cluster flats at Cranfield University. While these do not feature in the five-year supply calculations, they were included in the Housing Flow Reconciliation figures that the Council reported to Government.

### **Other Accommodation**

To ensure a realistic supply, pitches for Gypsies and Travellers that meet the definition set out in annex 1 of Planning Policy for Traveller Sites are also not included in the supply. This deliberate omission may lead to minor differences to the figures published in the ‘Net New Dwellings’ national statistic. Communal transitional/emergency accommodation (where units are not self-contained) is also not included.

### **Chiltern Beechwoods Special Area of Conservation (SAC)**

In March 2022, the Council received notification from Natural England about damage to the Chiltern Beechwoods Special Area of Conservation (SAC) resulting from high visitor numbers.

An ecology report undertaken on behalf of Dacorum Borough Council, revealed that action was needed to help protect the SAC and mitigate any adverse impact of development.

Whilst the Beechwoods SAC is outside of Central Bedfordshire, a Zone of Influence has been identified encompassing the areas that potentially impact the SAC (where visitors come from). The affected area includes a significant part of Central Bedfordshire.

The SAC is legally protected, so the Council was not able to issue decisions on residential applications within the Zone of Influence until an acceptable strategy to manage development pressures was agreed. The Council has therefore been working with Natural England, other affected authorities and the National Trust to develop a strategic mitigation solution. In March 2023, the Mitigation Strategy was agreed together with the designation of four Strategic Alternative Green Spaces (SANGS). The Council can now determine planning applications in the Zone of Influence.

Further information on the SAC and a map showing the zone of influence can be found on the [Council’s website](#).

## Five-year supply

The Housing Trajectory shows that over the five-year supply period (01/04/25 to 31/03/30), a total of **9,221** dwellings are considered to meet the deliverability test in the glossary of the NPPF.

**Table 5: Breakdown of five-year housing supply**

Source of supply	Number of homes
Legacy plan allocations and large strategic commitments	4,215
Local Plan 2015-2035 allocations	2,008 <sup>7</sup>
C2 care homes (homes released)	54
Committed windfall (10+ dwellings sites)	2,028
Committed windfall (1 to 9 dwellings sites)	415
Small windfall allowance	340
Large windfall allowance	161
<b>TOTAL</b>	<b>9,221</b>

At 1<sup>st</sup> April 2025, Central Bedfordshire Council can demonstrate **4.85 years** supply of deliverable housing sites. The calculation is as follows:

$$\begin{aligned} 9,506 \text{ divided by } 5 &= 1,901.2 \\ 9,221 \text{ divided by } 1,901.2 &= 4.85 \text{ (years)} \end{aligned}$$

As the housing land supply position fluctuates, housing completion data for Central Bedfordshire is collected and updated regularly.

---

<sup>7</sup> Figure revised on 20.06.2025

# **Central Bedfordshire in contact**

**Find us online:** [www.centralbedfordshire.gov.uk](http://www.centralbedfordshire.gov.uk)

**Call:** 0300 300 8307

**Email:** [localplan@centralbedfordshire.gov.uk](mailto:localplan@centralbedfordshire.gov.uk)

**Write to:** Central Bedfordshire Council, Priory House,  
Monks Walk, Chicksands, Shefford, Bedfordshire SG17 5TQ



# **Central Bedfordshire Council Local Development Scheme**

January 2025

**A great place to live and work.**

## Contents

1. Introduction .....	3
2. The current Development Plan.....	3
3. Central Bedfordshire Local Plan Review .....	6
4. Other relevant planning documents .....	8
5. Supporting Statement .....	13
Appendix 1 - Risk and Mitigation Management .....	15
Appendix 2: Local Plan timetable.....	20

## 1. Introduction

- 1.1 The Council has a duty to prepare, publish and maintain a Local Development Scheme (LDS). The LDS sets out a high-level work programme and proposed timetable for producing Local Development Documents and also acts as a basis for project and budget management.
- 1.2 The LDS provides information to help ensure that local communities, businesses, developers, service and infrastructure providers and other interested organisations know when they will be able to participate in the development of the Council's planning documents.
- 1.3 The requirement for an LDS is set out in the Planning and Compulsory Purchase Act 2004 (section 15, as amended). The LDS must specify, amongst other things:
- The documents that will be prepared to form the statutory development plan;
  - What will be included in each document and the geographic area to which it relates;
  - Whether the documents are to be prepared jointly with one or more other local planning authorities; and
  - The timetable for the preparation and revision of documents.
- 1.4 This LDS covers the period from 2023 up to 2028. It replaces the previous version approved in November 2023 and has been updated in response to the Government's requirement to confirm plan making timescales within 12 weeks of the publication of the new National Planning Policy Framework (December 2024).

## 2. The current Development Plan

- 2.1 The Government requires every local authority to have an up-to-date Development Plan in place.
- 2.2 The current Development Plan for Central Bedfordshire includes:
- [The Central Bedfordshire Local Plan 2015 - 2035 \(2021\)](#) ;

- [The Minerals and Waste Local Plan: Strategic Sites and Policies \(2014\)](#);
- [Minerals and Waste Local Plan \(2005\)](#) ; and
- The following [adopted Neighbourhood Plans](#):
  - Arlesey (2018)
  - Biggleswade (2022)
  - Caddington and Slip End (2018)
  - Campton and Chicksands (2021)
  - Clifton (2024)
  - Eaton Bray (2019)
  - Fairfield (2017)
  - Flitton, Greenfield and Pulloxhill (2021)
  - Gravenhurst (2021)
  - Haynes (2021)
  - Houghton Regis (2024)
  - Langford (2021)
  - Northhill (2019)
  - Maulden (2024)
  - Pottton (2019)
  - Silsoe (2019)
  - Sutton (2021)
  - Totternhoe (2021)
  - Wrestlingworth and Cockayne Hatley (2018)

2.3 Central Bedfordshire Council was formed as a unitary authority in April 2009. This brought together areas previously administered by Mid Bedfordshire District Council, South

Bedfordshire District Council and Bedfordshire County Council. The adopted Local Plan is the key strategic planning document and is the first Local Plan to cover the entire administrative area of Central Bedfordshire. It replaced the separate plans prepared for the previous administrative areas, namely, the Core Strategy and Development Management Policies DPD (2009) and the Site Allocations DPD (2011) for the former Mid Bedfordshire area, the Local Plan for the former South Bedfordshire area (2005) and the saved policies from the Bedfordshire Structure Plan (1997).

- 2.4 The adopted Local Plan sets out the long-term vision and objectives for the area and plans for the delivery of new homes, infrastructure and jobs. It also sets out policies to be used for determining individual planning applications.
- 2.5 The adopted Local Plan consists of one main document, accompanied by the Policies Maps, which provides a spatial representation of the Local Plan policies. It is supported by an evidence base of technical documents, which can be viewed on the [Local Plan pages](#) of the Council's website.
- 2.6 The Minerals and Waste Local Plan: Strategic Sites and Policies (MWLP: SSP) document was adopted by the Council in January 2014. It was also adopted by two other councils, Bedford Borough Council (15 January 2014) and Luton Borough Council (21 January 2014). The MWLP: SSP sets out the strategic allocations for mineral extraction and for waste management development in the Plan area together with strategic policies which will guide the ongoing supply of minerals and development of waste management facilities.
- 2.7 Some of the policies in the MWLP: SSP supersede the policies in the previous Bedfordshire and Luton Minerals and Waste Local Plan, which was adopted in 2005.
- 2.8 The Localism Act (2011) gave communities the power to shape development in their area by writing a Neighbourhood Plan with a vision for their local area and accompanying planning policies. Once adopted these documents are statutory plans to be used for decision making in planning decisions. At the time of writing, there are currently 19 adopted plans, as set out in paragraph 2.2, and several other areas are currently developing their own Neighbourhood Plans. The Council's website sets out the latest [neighbourhood planning status](#) for each area.

### 3. Central Bedfordshire Local Plan Review

- 3.1 The Local Plan must be kept up-to-date and Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every five years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.
- 3.2 The Council made a policy commitment in the adopted Local Plan to carry out an early review, as acknowledged by the Inspectors in the [Inspectors Report \(July 2021\)](#). The requirement to review the Local Plan is set out in Policy SP1a: Partial Review of the Local Plan. This requires the Council to commence a partial review within six months of adoption. The review was completed in July 2023 and work commenced on preparing a new Local Plan.
- 3.3 The Council will continue to report on the effectiveness of the policies in the adopted Local Plan as part of the Annual Monitoring Report (AMR). The AMR will be published on an annual basis, which will allow the Council to keep communities and stakeholders informed of the progress in plan-making. The AMR will also include an assessment of whether the targets set out in the Monitoring Framework at Appendix 3 of the adopted Local Plan are being achieved.

#### Local Plan Timetable

- 3.4 The timetable for the Local Plan is set out in Appendix 2. The key stages in respect of this are summarised below:
- Preparation of Local Plan update (including monitoring of polices and updating the evidence base): Evidence gathering for Local Plan: **July 2023 onwards**. This is an ongoing process as the evidence base is developed and updated throughout the preparation of the Plan, and may be carried out up until its Submission to the Secretary of State;
  - Outcome of the Plan Review reported to Council committees: **September 2023 - November 2023**;
  - Informal/non-statutory engagement: **September 2023 - March 2024**.

- Early public and stakeholder engagement: **July 2024 – September 2024**. This is not a statutory stage in the process but ensures early engagement with local communities and key stakeholders.
- Public and stakeholder engagement - Local Plan Issues and Options Formal Consultation (Regulation 18): **February 2026 – April 2026**. Consultation will take place over a 12-week period, however, the exact timeframe will be confirmed once the updates and review of the evidence base has been undertaken.
- Publication of the proposed submission (Pre-Submission) plan for representations (Regulation 19): **September 2027 – October 2027**. Consultation will take place over a minimum of 6-weeks, however, the exact timeframe will be confirmed once the representations made at Regulation 18 have been reviewed and any updates to evidence base has been undertaken.
- Submission of Plan to Secretary of State for Examination (Reg 22): **February 2028**
- Examination Period: **March 2028 – August 2028**. This is an externally led process, therefore, the Council has no direct control over timeframes. The Examination period identified aligns with the timescales being proposed by Government as part of changes to the plan making system.
- Inspector’s Report: **September 2028**
- Adoption: **December 2028**

3.5 It is important to note that the timeframe for the Examination of the Plan is indicative. This stage will be determined by the Planning Inspectorate and will therefore influence when the final adoption date of the Plan will occur.

3.6 The timetable has been produced with the best available information at the time of writing. The LDS timetable may be subject to change in response to changes in circumstances which are outside of the Council’s control, for example, updates to national government policy and guidance and legislation; government decisions and announcements in relation to the delivery of significant infrastructure across the wider region, such as East-West Rail and the Bedford and Milton Keynes Waterway Park project; and a decision on the Universal Studios project.

- 3.7 The Government have implemented a series of changes to the planning system, with the Levelling Up and Regeneration Act (2023) and the publication of the new National Planning Policy Framework in December 2024. Further known changes coming in 2025 include the Planning and Infrastructure Bill, National Development Management Policies and updated guidance on Green Belt, viability, flood risk and climate change, for example. If there are unexpected changes to what is being proposed and how the new plan-making system will operate, there may be a need to review and update the LDS again.
- 3.8 In terms of East-West Rail, the [Autumn Statement in October 2024](#) reconfirmed Government's transformative growth plans for our railways, including the intention to deliver the remainder of the East West Rail project between Bletchley and Cambridge.
- 3.9 The Autumn Budget (2024) set out that government is prioritising the investment that matters most, which includes investment in transport – unlocking growth-enhancing schemes like East West Rail between Oxford, Milton Keynes and Cambridge, including funding to accelerate delivery of the Marston Vale Line ensuring services will run between Oxford and Bedford from 2030.
- 3.10 The East West Rail Company will consult further on its proposals as part of a statutory consultation ahead of an application for a Development Consent Order. This consultation is due to take place in 2025.

### **Risk Assessment**

- 3.11 An assessment has been carried out to identify factors which could impact on the delivery of the work programme set out in the LDS. The risks and actions to manage these risks are identified in Appendix 1.

## **4. Other relevant planning documents**

- 4.1 The Local Plan is also supported by other local planning documents. This includes Supplementary Planning Documents (SPDs), which provide additional guidance to Local Plan policies, and Technical Guidance documents. These documents and their status are identified in Table 1.

**Table 1: Other relevant planning documents**

Document	Scope	Status
<a href="#">Annual Monitoring Report (AMR)</a>	Monitors the implementation of both the Local Development Scheme and policies in the Local Plan.	Produced annually, covering the period April to March.
<a href="#">Design Guide SPD</a>	Supports Policy HQ1 of the Local Plan and sets out the design principles and standards to ensure developments are of the highest quality. The SPD is a material consideration in determining planning applications.	Adopted August 2023.
<a href="#">Electric Vehicle Charging: Guidance for New Development SPD</a>	The Council has created the Electric Vehicle Charging: Guidance for New Development SPD. The SPD sets out the requirements for electric vehicle charging points to be provided for all new developments and provides guidance on the types, design, layout and standards of electric vehicle charging, as well as the information that developers are required to provide at the planning application stage. The SPD is a material consideration in determining planning applications.	Adopted December 2022.
<a href="#">Environmental Framework</a> (Technical Guidance)	Brings together studies, assessments and guidance documents covering the natural environment, sustainable resource management and the	Adopted June 2016. Will be reviewed as part of the Local Plan evidence base review and updates may be required.

	challenge of mitigating and adapting to Climate Change.	
<a href="#">Forest of Marston Vale Design Guidance SPD</a>	The Council has created the Forest of Marston Vale: Design Guidance SPD in collaboration with Bedford Borough Council and the Forest of Marston Vale Trust. The SPD supports Policy EE9 of the Local Plan and sets out how the 30% tree cover requirement should be achieved in the Forest area. It provides specific guidance on the amount of trees required for different types and scales of development, the tree planting options available and design guidance to ensure the character of the Forest area is protected. The SPD is a material consideration in determining planning applications.	Adopted December 2022.
<a href="#">Housing Policy Technical Guidance SPD</a>	The Housing Policy Technical Guidance SPD provides further detail on how the housing policies within the Local Plan should be implemented, including details of what CBC are expecting from developers and how applications will be assessed. The SPD is a material consideration in determining planning applications.	Adopted August 2023.
<a href="#">Infrastructure Delivery Plan (IDP)</a>	The IDP forms part of Central Bedfordshire Council's Local Plan evidence base. The purpose of the IDP	Last updated June 2024. The IDP will be reviewed alongside the new Local Plan.

	<p>is to set out the infrastructure that will be required to support the delivery of the allocated housing and employment growth through the Local Plan to 2035.</p>	
<p><a href="#">Leisure Strategy SPD</a></p>	<p>The Leisure Strategy is a suite of facility-based strategies which look at the current and future provision of indoor sports and leisure centres, recreational open spaces, and outdoor sport. This is split into Chapter 1 – Indoor Leisure Facilities Strategy, Chapter 2 – Recreation and Open Space Strategy, and Chapter 3 – The Playing Pitch Strategy. The fourth chapter seeks to marry the facilities with the types of physical activities needed to support Central Bedfordshire’s residents in pursuing a healthy active lifestyle.</p>	<p>Chapter 1: updated and adopted July 2021</p> <p>Chapter 2: updated and adopted 2023. Childrens Play Provision Guidance updated September 2022.</p> <p>Chapter 3: updated 2024.</p> <p>Chapter 4: updated and adopted July 2021.</p>
<p><a href="#">Local Transport Plan 3 (LTP3) 2011-2026</a></p>	<p>The Local Transport Plan sets out a long-term framework for investment in transport across Central Bedfordshire. It establishes a strategic approach through which to deal with key transport issues, a series of objectives, and broad areas of intervention through which schemes will be identified and improvements made to the transport network. The long-term approach of the Plan is supported by a shorter-term, three-</p>	<p>Adopted 2011. This will be updated by LTP4 to include the latest guidance and aspirations for the area and is currently in progress.</p>

	year Implementation Plan, detailing specific initiatives and areas in which investment will be made.	
<a href="#">Masterplans and Development Briefs</a> (Technical Guidance)	Guides the development of specific allocated sites, to ensure that they meet the Plan’s objectives. They often include key principles, design guidance, and provide a masterplan which has been developed in consultation with residents.	Many of the larger scale sites allocated by the adopted Local Plan will require these, and some have already been prepared or are in the process of being prepared. The Local Plan includes Policy HQ9 which sets the thresholds for the preparation of Development Briefs, which would also apply to any windfall sites.
<a href="#">Minerals and Waste Plan</a>	The Minerals and Waste Local Plan will contain an overall vision which sets out how the area should develop in respect of minerals extraction and waste management developments. It will contain strategic objectives setting out how the Plan will implement the vision. As well as policies for the provision of sufficient minerals, waste recovery and disposal capacity, it will also identify strategic sites for both mineral extraction and waste management.	To be reviewed (timetable to be confirmed).
<a href="#">Parking Standards for New Developments SPD</a>	The Parking Standards for New Developments SPD sets out the number of parking spaces required for different types of vehicles in both	Adopted August 2023.

	residential and commercial developments, as well as giving more comprehensive guidance on the types of parking that should and shouldn't be provided. The SPD is a material consideration in determining planning applications.	
<a href="#">Statement of Community Involvement (SCI)</a>	Sets out the Council's approach to engaging with communities to inform plan making, as well as engagement within the development management and enforcement processes.	Adopted October 2022. The Local Plan will be accompanied by an Engagement Strategy, setting out how and when residents will have the opportunity to engage with and inform the Local Plan.

## 5. Supporting Statement

5.1 This section explains the context for preparing the Local Plan as set out in the LDS. It also explains how the Council will manage resources and make decisions during the plan-making process.

### Links to Other Strategies and Plans

5.2 When preparing the new Local Plan, internal and external plans and strategies with spatial implications for the Council will be considered. This will ensure the strategic priorities contained in those plans and strategies, relating to the use and development of land within Central Bedfordshire, are integrated into the Local Plan. The Council will need to consider a range of Council plans and strategies such as, the Central Bedfordshire Economic Strategy: Building Local Prosperity, the Central Bedfordshire Sustainability Plan 2020-2030 (refreshed in 2024), and the Central Bedfordshire Vision 2050. The Council will also need to consider documents produced by external organisations and bodies, such as England's Economic Heartlands (EEH).

### **Joint Working**

- 5.3 The Council has a legal requirement to engage with certain 'Prescribed Bodies' under the 'Duty to Cooperate' when preparing Local Plans which address strategic, cross-boundary matters. This includes engagement with neighbouring Local Planning Authorities, and other statutory bodies, constructively, actively and on an ongoing basis.

### **Resources**

- 5.4 The Strategic Growth team will have primary responsibility for preparing the Local Plan. Other specialist officers from within the Council will also be engaged to inform the evidence base and the development of policies.
- 5.5 External consultants will be engaged on specific projects where it requires certain expertise or there is a lack of capacity within the Council.

### **Reporting and decision-making procedures**

- 5.6 The Local Plan process will be project managed by the Strategic Growth Programme Manager who will report on a regular basis to the Head of Strategic Growth. A Governance Strategy has been prepared, setting out the governance structure for the project. The Council's Corporate Management Team and the Leader of the Council (as Executive Member for Planning) will be provided with progress reports as appropriate.
- 5.7 The Local Plan will be considered by Members at each stage. Full Council agreement will be required at key stages, including Publication and Adoption, in accordance with the Council's Constitution.

## Appendix 1 - Risk and Mitigation Management

Table 2: Risk and Mitigation Management

Risk	Comment	Likelihood / Impact	Mitigation Measures
Preparation of Local Plan to meet key project milestones.	<ul style="list-style-type: none"> <li>The Local Plan relies on substantial evidence on a range of issues, some of which is provided by external consultants and bodies.</li> <li>Failure of key partners and other agencies to deliver evidence on time and make responses to key elements of the process.</li> <li>The level of public engagement could prove greater than assumptions made, including new evidence submitted unexpectedly.</li> <li>The quality of evidence base could be compromised and/or key milestones unable to be met.</li> <li>Examination Process – ensure documents pass soundness and legal tests</li> </ul>	Medium / high  Impact could be considerable.	<ul style="list-style-type: none"> <li>Monitor progress and give priority to achieving the key milestones set out in the LDS.</li> <li>Provide resources and funding to complete evidence gathering. Encourage early engagement to secure evidence.</li> <li>Build in flexibility in the programme to account for possible delays.</li> <li>Consider drawing in additional resources, if necessary.</li> <li>Reflect on lessons learnt from preparing previous development plans.</li> </ul>
Changes in national policy	<ul style="list-style-type: none"> <li>The NPPF and National Planning Practice Guidance</li> </ul>	Medium / high.  Impact could	<ul style="list-style-type: none"> <li>Closely monitor new policy and guidance</li> </ul>

Risk	Comment	Likelihood / Impact	Mitigation Measures
<p>and legislation which require a significant alteration to Local Plan content and timetable</p>	<p>may be updated during the preparation of the Local Plan. The NPPF was most recently updated in December 2024. The Planning Practice Guidance is updated regularly. Any changes to these documents will need to be considered.</p> <ul style="list-style-type: none"> <li>The full details relating to changes to the planning system are still not yet confirmed, and additional Government consultations on further changes to the NPPF and National Development Management Policies is expected following the commencement of the Local Plan.</li> </ul>	<p>be considerable.</p>	<ul style="list-style-type: none"> <li>Build flexibility into the programme to enable any changes to be taken into consideration and reflected in the evidence base.</li> <li>Should changes to Government policy or the legislative framework impose additional requirements, and therefore additional time to resolve, an amendment to the Local Development Scheme will be prepared.</li> </ul>
<p>Staff resources</p>	<ul style="list-style-type: none"> <li>The need for additional staff resources may occur through sickness, staff turnover, difficulties in recruitment, or volume of work – both within the Strategic Growth Team and</li> </ul>	<p>Medium / high Impact could be considerable.</p>	<ul style="list-style-type: none"> <li>Recruitment to commence as soon as the current post holder submits their notice (subject to available budget).</li> <li>Provide appropriate training to encourage staff</li> </ul>

Risk	Comment	Likelihood / Impact	Mitigation Measures
	<p>in other teams across the Council that input into the Local Plan.</p> <ul style="list-style-type: none"> <li>• There may also be unforeseen pressures on staff time relating to other strategic workstreams, associated Planning reforms or strategic/regional consultations, for example.</li> </ul>		<p>retention and to upskill existing team members.</p> <ul style="list-style-type: none"> <li>• Consider redeployment of suitable staff from other planning teams should opportunities arise to meet key targets and milestones.</li> <li>• Consider recruitment incentives.</li> <li>• Consider using consultants where specific expertise is required.</li> <li>• Employ agency staff/consultants to cover periods of absence (subject to available budgets).</li> </ul>
Pressure on financial resources	<ul style="list-style-type: none"> <li>• Undertaking evidence studies, public consultation events and the formal Examination of the Local Plan requires significant financial resources.</li> <li>• Any additional unforeseen costs would place a further burden on the budget.</li> </ul>	Low / medium. Impact could disrupt progress.	<ul style="list-style-type: none"> <li>• Close monitoring of the Local Plan budget and likely future commitments.</li> <li>• Ensuring risks are raised during the budget monitoring process.</li> </ul>
Duty to Cooperate	<ul style="list-style-type: none"> <li>• If the Council cannot demonstrate to the Examination Inspector it has complied with the Duty to</li> </ul>	Low / medium. Impact could disrupt progress.	<ul style="list-style-type: none"> <li>• Work closely with neighbouring local authorities in respect of the</li> </ul>

Risk	Comment	Likelihood / Impact	Mitigation Measures
	<p>Cooperate, the Local Plan will not be able to proceed further in the Examination process.</p> <ul style="list-style-type: none"> <li>Engagement could slow down plan preparation if external stakeholders do not engage in a timely manner.</li> </ul>		<p>Duty to Cooperate on strategic priorities.</p> <ul style="list-style-type: none"> <li>Appropriate ongoing engagement with statutory partners on identified Duty to Cooperate issues.</li> <li>The preparation of Statements of Common Ground will identify strategic cross boundary issues and identify the mechanisms to address such issues, including the preparation of joint evidence if appropriate.</li> </ul>
Political Decision Making	<ul style="list-style-type: none"> <li>The political makeup and priorities of the Council may change over the duration of the preparation of the Local Plan.</li> <li>With no party in overall control of the Council, there could be an impact on securing Full Council agreement/approval at key stages of the Local Plan.</li> </ul>	Medium / high. Impact could be considerable.	<ul style="list-style-type: none"> <li>Internal Governance arrangements provide opportunities for Members to meet and discuss emerging policies and proposals with officers and senior management.</li> </ul>
Neighbourhood Plans	<ul style="list-style-type: none"> <li>Neighbourhood Plans progressing more quickly than the Local Plan resulting</li> </ul>	Medium / high. Impact could	<ul style="list-style-type: none"> <li>Engage with Neighbourhood Plan groups</li> </ul>

Risk	Comment	Likelihood / Impact	Mitigation Measures
	<p>in the two parts of the development plan diverging, including the evidence base.</p>	<p>be considerable.</p>	<p>to seek alignment as far as practicable.</p> <ul style="list-style-type: none"> <li>Emerging evidence base to take account of Neighbourhood Plans.</li> </ul>
<p>Infrastructure</p>	<ul style="list-style-type: none"> <li>There are still some uncertainties around rail and road infrastructure, including the detailed timetable for the delivery of East-West Rail, upgrades to the A1, as well as other projects such as the BMK Waterway Park.</li> </ul>	<p>Medium / high. Impact could be considerable.</p>	<ul style="list-style-type: none"> <li>Engage with relevant infrastructure groups (EWR, DfT, National Highways, Homes England etc) and the Ministry of Housing, Communities and Local Government (MHCLG).</li> <li>Respond to consultations and keep up to speed with the latest programmes for strategic infrastructure delivery.</li> </ul>

## Appendix 2: Local Plan timetable



**Central  
Bedfordshire**

# **Central Bedfordshire in contact**

**Find us online:** [www.centralbedfordshire.gov.uk](http://www.centralbedfordshire.gov.uk)

**Call:** 0300 300 8307

**Email:** [customers@centralbedfordshire.gov.uk](mailto:customers@centralbedfordshire.gov.uk)

**Write to:** Central Bedfordshire Council, Priory House,  
Monks Walk, Chicksands, Shefford, Bedfordshire SG17 5TQ



# Leighton Buzzard Development Briefs: Land South of the High Street

for Central Bedfordshire Council



think place



Foreword	..... p. 03
1. Introduction	..... p. 04
2. The Site and Leighton Buzzard Town Centre	..... p. 07
3. Planning Policy Context	..... p. 19
4. Vision and Objectives	..... p. 22
5. Land Uses	..... p. 27
6. Urban Design	..... p. 32
7. Landscape	..... p. 45
8. Transport and Movement	..... p. 49
9. Delivery	..... p. 54

## Foreword

---

This document was adopted by Central Bedfordshire Council  
as Technical Guidance for Development Management  
Purposes on 27 March 2012



### Introduction

1.1 Central Bedfordshire Council has endorsed the Luton and South Bedfordshire Core Strategy which plans to deliver significant development in the period 2011-2026. This is to include the delivery of around 5,000 new homes within the urban areas of Leighton Linslade, Dunstable and Houghton Regis; urban extensions to the east of Leighton-Linslade (2,500 new homes) and to the north of Houghton Regis (5,150 new homes); and around 600 new homes in the district's rural areas. At the time of writing (September 2011), six planning applications have been submitted for a total of circa 2,640 homes at East of Leighton Buzzard.

1.2 These new homes will increase the resident population of Leighton Buzzard and its surrounding villages significantly over the next 15 years. In order to ensure that this housing growth results in the creation of successful sustainable communities, the Council is also planning for new jobs, infrastructure, schools, social/health services, shops, services, and leisure facilities to meet the needs of the growing population, and this includes the improvement / enhancement of Leighton Buzzard town centre.

1.3 Key to the revitalisation of the town centre is the redevelopment of the land lying to the south of the High Street, as outlined in red in Figure 1.1, right. This brief has been prepared in parallel to the development brief for the Bridge Meadow site lying west of the town centre.



FIG. 1.1 South of the High Street Site

1.4 The site offers the opportunity to create a sustainable extension to the town centre shopping area which enhances the retail offer and the centre's competitiveness, while preserving the town centre's existing high quality character, reinforcing its distinctiveness and enhancing the town's historic character and environment.

### Purpose of the Brief

1.5 The purpose of this brief is to showcase this development opportunity and to set out a written statement of the Council's development aspirations for the site. It establishes a package of guiding planning principles that form a framework for the preparation of development proposals, and will be used as the basis to determine future planning applications affecting the site (alongside the Development Plan and other considerations).

### Community and Stakeholder Involvement

1.6 This development brief has been prepared following public and stakeholder consultation on the initial development proposals and options in February 2011. There was subsequent public consultation on the draft brief in November 2011.

1.7 These consultation exercises were undertaken in parallel to similar consultations on proposal for the Bridge Meadow site.

1.8 On both occasions, members of the public were able to visit the centre and review display boards setting out the initial proposals for the sites. Members of the public were encouraged to fill in questionnaires which aimed to capture the local community's views and preferences regarding the options and proposals being consulted on.

1.9 The feedback received through consultation has influenced the proposals set out in this document, alongside further technical work. Full details of the responses can be found in the separate Consultation Statements.

### Scope of the Development Brief

1.10 This brief is structured as follows:

- Section 2 describes the site and the town centre within which it is located;
- Section 3 provides an overview of the planning policy context that underpins the proposals;
- Section 4 outlines the Council's overarching Vision and objectives for the site;
- Section 5 proposes suitable land uses;
- Section 6 sets out urban design principles;
- Section 7 considers landscaping;
- Section 8 outlines the proposed access and movement arrangements; and
- Section 9 sets out proposed delivery arrangements.

# Leighton Buzzard Development Briefs: Land South of the High Street

for Central Bedfordshire Council

## 2. The Site and Leighton Buzzard Town Centre



### The Site

#### Size

2.1 The site extends to approximately 2.65 hectares (6.55 acres).

#### Location

2.2 The site lies within Leighton Buzzard Town Centre to the south of the High Street. Leighton Buzzard is located in Bedfordshire, approximately 23km (14 miles) south of Milton Keynes 12km (8 miles) west of Dunstable, and 70km (44 miles) north of London.

2.3 Leighton Buzzard railway station is located approximately 1km (0.6 miles) to the west (London Midland services to London Euston in 34 minutes and Milton Keynes in 9 minutes). The M1 (Junction 11) is approximately 16km (10 miles) to the east.



FIG. 2.1 Context plan

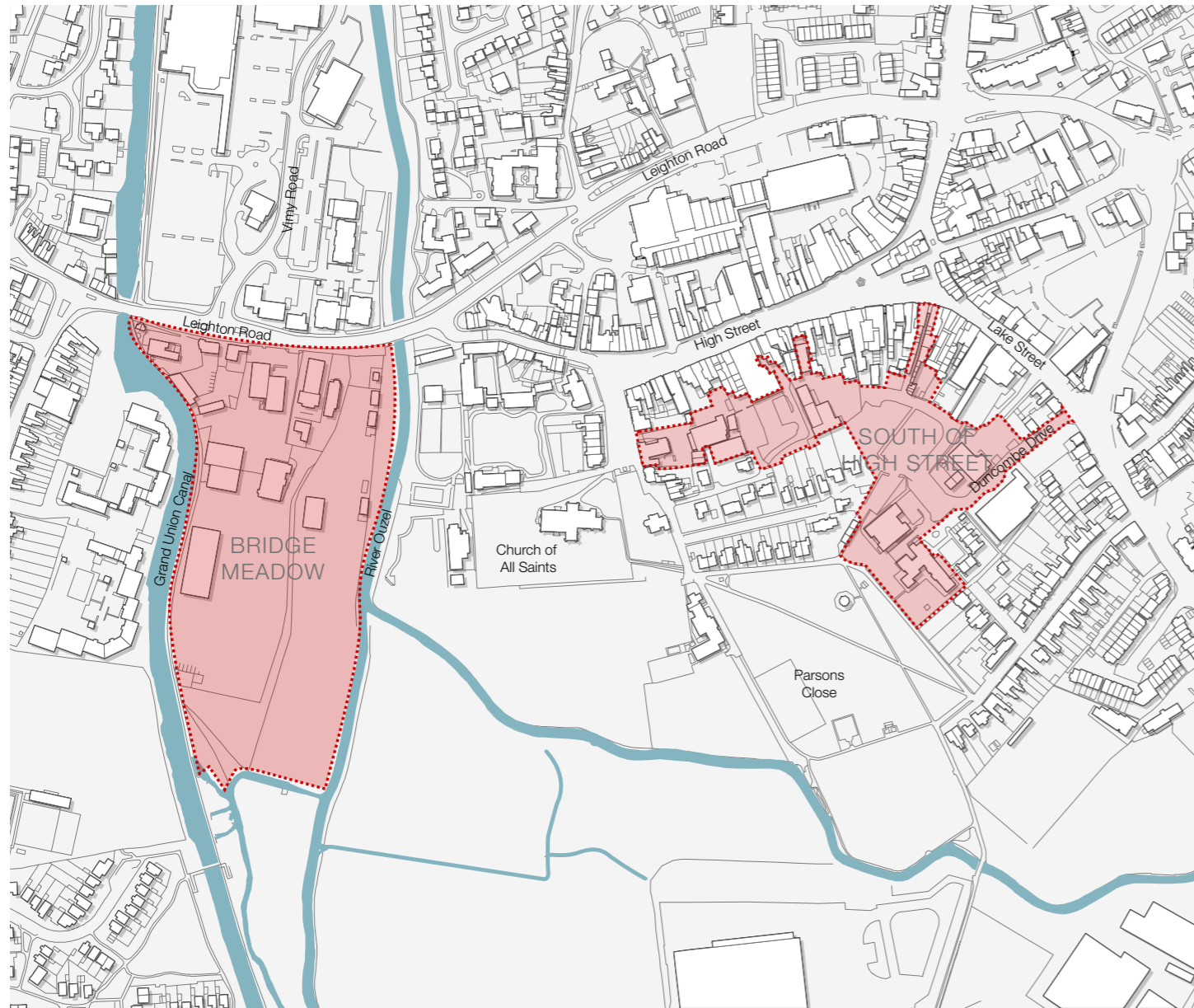


FIG. 2.2 Sites location plan



FIG. 2.3 Aerial Photograph

### Existing Development and Land Ownerships

2.4 The site is previously developed and accommodates a range of uses and buildings, as follows (refer to Figure 2.4):

#### Area 1 – Westlands Care Home and Day Centre (0.62 ha)

This area accommodates a three storey elderly persons care home (currently operated by BUPA) and a single storey elderly persons day centre which also provides rehabilitation services for people recently discharged from hospital. Both buildings were built in the post-war period and are nearing the end of their economic life. CBC hold the freehold to this land.

#### Area 2 – Duncombe Drive and Surface Car Park (0.71 ha)

This area comprises Duncombe Drive which is the main access road onto the site from Lake Street and the surface car park which comprises circa 140 parking spaces. This land is owned by CBC.

#### Area 3 – Fire Station (0.17 ha)

This area accommodates Leighton Buzzard Fire Station and associated yard area. It is owned by the Bedfordshire and Luton Fire and Rescue Service.

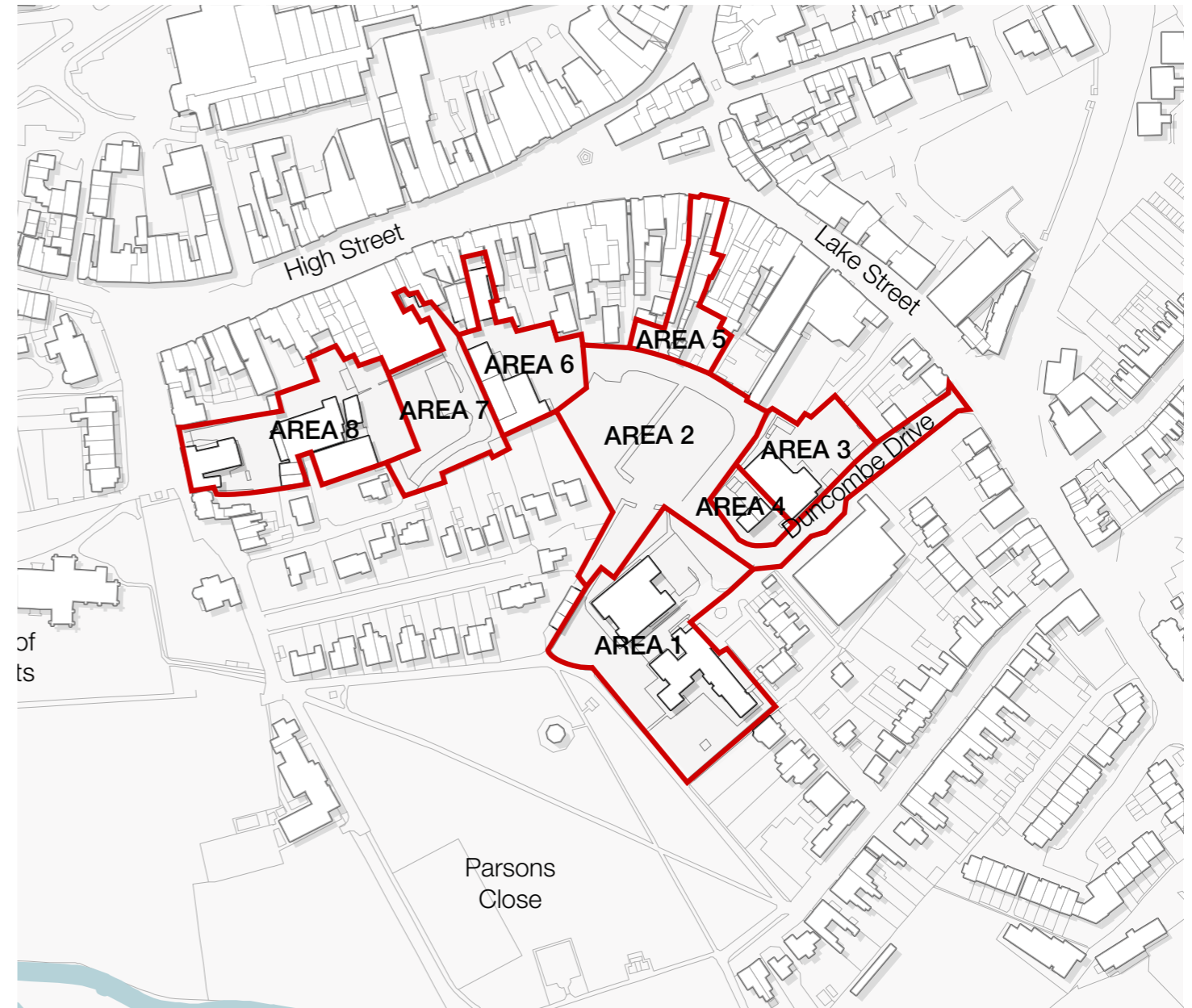


FIG. 2.4 Existing development areas

### Area 4 – Private Homes (0.07 ha)

This area accommodates two post-war semi detached privately owned dwellings.

### Area 5 – Bell Alley (0.16 ha)

This area comprises buildings fronting onto High Street plus small shop units and other ad-hoc structures to the rear that front onto Bell Alley, a pedestrian-only alleyway. Bell Alley is in a mix of ownerships. There is a Listed Building at the High Street end.

### Area 6 – Disused Former Cattle Market Site (0.23 ha)

This area comprises three derelict former industrial sheds and associated land which was formerly used as a Cattle Market. The site is currently disused and is understood to be in private ownership.

### Area 7 – Disused Land to Rear of High Street (0.25 ha)

This area comprises a cleared previously developed site with areas of hard standing and vegetation which is currently disused. The site is understood to be in private ownership.

### Area 8 – Post Office, Disused Sorting Office and Industrial Buildings (0.42 ha)

This area comprises the existing Post Office building and the land at the rear, which accommodates a disused sorting office and associated light industrial sheds.



FIG. 2.5 Duncombe drive



FIG. 2.6 Service access to the Litten Tree pub from Duncombe drive

### *Neighbouring Development*

2.5 The site is bound to the north by the rear of properties fronting the High Street which are mainly in retail use at ground floor level (with a mix of uses on upper floors). Some of which benefit from rear servicing and car parking. A number of these buildings are Listed and much of the town centre is within the Leighton Buzzard Conservation Area.

2.6 The southern boundary is bound by the rear gardens of mature houses fronting Church Avenue and Parsons Close, a Victorian park with views extending across the river plain. A mixed housing area (with associated amenity space) and BT telephone exchange lies to the east of the site. To the west of the site lies Church Square with All Saints Church beyond.

### *Access*

2.7 Vehicle access to the eastern part of the site is via Duncombe Drive which connects into Lake Street. Vehicle access to the western part of the site is achieved from Church Square. There is currently no east-west through route through the site. A series of alleyways provide pedestrian access between the site and the High Street and the park to the south.

### *Physical*

2.8 The site slopes gently to the south. We are not aware of any significant physical or environmental constraints to development on the site, other than the surrounding development and heritage assets.



FIG. 2.7 Bell Alley looking towards the car park in the site



FIG. 2.8 Telecoms building adjacent to the site on Duncombe Drive



FIG. 2.9 In the site looking past cottages to Parson's Close



FIG. 2.10 Town centre car park in the site with Church Spire in the background

### Leighton Buzzard Town Centre

#### Role in Hierarchy

2.9 Leighton Buzzard sits within a hierarchy of centres as illustrated in Figure 2.11 below:



FIG. 2.11 Town centres hierarchy  
(Source: Draft Luton and South Central Bedfordshire Core Strategy)

#### Composition

2.10 Leighton Buzzard is a traditional market town centre with the main shopping area focussed along the High Street and surrounding streets (including Lake Street, Hockcliffe Street, and North Street) plus the Waterborne Walk Shopping Centre (to the north of the High Street).

2.11 The Council's Retail Study (2009) notes that the centre has limited representation of key multiple retailers but a high proportion of independent operators. Multiple comparison retailers present include WH Smith, Argos, Boots, Peacocks as well as a number of smaller clothing and footwear national brands, although the study identifies an under-provision of clothing and footwear stores. Multiple operators are concentrated within the Waterborne Walk centre which contains the town centre's only concentration of larger modern retail units. The Waterborne Walk centre was originally constructed in 1973 and is anchored by a Waitrose. There is also an Iceland store on the High Street. These stores compete with Morrisons and Tesco superstores located in out of centre locations.

2.12 The town centre leisure offer includes a theatre and a number of restaurants and cafés, but is dominated by a 'wet-led' pub/bar offer.

#### Vitality and Viability Indicators

2.13 According to GOAD Experian data from February 2011, Leighton Buzzard's retail vacancy rate is below the UK average. Despite the low vacancy rate, the retail offer in the town is very much geared towards the economy end of the market. This contradicts the relative affluence of the local area, yet reflects the dominant role of competing centres (such as Milton Keynes). Retailers cite a lack of quality available stock of sufficient size as being major reasons for their absence from Leighton Buzzard.

2.14 Leighton Buzzard town centre is an attractive environment due to the diversity and quality of its historic buildings and high quality public realm. There are approximately 105 Listed Buildings within an 800 metre radius of the High Street. The variety in the built environment creates an interesting street scene and the well-preserved High Street is pedestrian friendly. The narrow streets/alleys leading off from the main High Street add character to the town and offer a good opportunity to create active linkages between different parts of the town.

2.15 The high quality built environment is a valuable asset to the town which can be a major attraction for retailers and shoppers, but paradoxically has also contributed to preventing key retailers locating there as a result of the corresponding lack of larger, high quality space which meets the needs of modern retailers. However, the shopping experience in the town is enhanced and diversified by Leighton Buzzard Market which trades around the Market Cross in the centre of the town.

### Accessibility:

#### Car

2.16 Vehicle access to the town centre from the surrounding residential areas is via Hockliffe Road, Billington Road, North Street and Leighton Road which feed into the wider A/B road network. The A5 is approximately 5km (3 miles) to the east of the town centre and connects the town to Milton Keynes approximately 23km (14 miles) to the north and Dunstable approximately 12km (8 miles) to the south and Aylesbury approximately 15 km (9.3 miles) to the south west. Dunstable is located approximately 10 km (6.2 miles) to the east and is accessible via the A505 from Leighton Buzzard. There are plans to construct an A5-M1 link road which will connect the A5 north of Dunstable to join the M1 at a new Junction (J11A) south of Chalton. This is due to open in 2016 – 2017.

2.17 There are four public car parks in the town centre in addition to the out of centre car parks located at Tesco and Aldi, as detailed in Table 2.12 below:

#### Train

2.18 Leighton Buzzard has a train station on the Linslade side of the town approximately 1 km (0.6 miles) to the west of the town centre, providing local connections to stations including Bletchley, Milton Keynes, Hemel Hempstead and Watford as well as more strategic destinations including London Euston and Birmingham New Street. Services to London Euston take from 34 minutes with 15 minute frequency at peak times, while Milton Keynes is 9-12 minutes away with 10 to 15 minute frequency at peak times.

#### Bus

2.19 The town centre is served by 13 regular bus routes which provide services to the surrounding suburbs and towns including Aylesbury, Milton Keynes, Dunstable and Luton. Town centre bus stops are concentrated on the High Street and Hockliffe Street with services radiating along the town's main arterial road network.

#### Pedestrians and Cyclists

2.20 The High Street is subject to through traffic controls which creates a pedestrian/cycle friendly environment with adequate cycle and pedestrian crossing facilities evident throughout the town centre. A number of pedestrian-only alleys permeate into town centre blocks which significantly improve pedestrian connectivity, although some of these have been stopped up over time.

#### Character

2.21 The centre sits at the heart of Leighton Buzzard and Linslade (which effectively form one town). The town centre follows a traditional market town street layout with the main shopping area focussed along the linear High Street with historic development patterns (including burgage plots) which remain largely intact. This historic context is supplemented by more modern developments such as Waterborne Walk which follow more modern layouts.

2.22 The built form along the High Street (and surrounding streets) is dominated by attractive historic buildings dating back as early as the 13th century. This includes All Saints Church, an early English parish church dating from 1277 which boasts a 190 ft spire, medieval ironwork and some intriguing graffiti dating from the 14th, 15th and 16th Centuries. The quantity, quality and layering of the town centre's historic assets creates a rich townscape, that is recognised in the listing of several individual buildings (predominantly Grade II) and the Scheduled Ancient Monument status of the Market Cross.

2.23 Many of these historic buildings have been adapted over the centuries and there are numerous Medieval fragments of buildings retained behind more recent Georgian and Victorian facades. There are also a small number of intact pre-Georgian buildings.

Location	Type	No. of Spaces
West Street (Waterborne Walk shopping centre)	Multi-storey	266
Hockliffe Street	Surface	126
Baker Street	Surface	42
Duncombe Drive (within the site)	Surface	140

(Source: parkopedia.com)

FIG. 2.12 Town centre car parks

2.24 Much of the town centre is designated as a Conservation Area and the urban pattern is characterised by narrow, deep plots, with alleyways running through to service spaces behind the buildings; a legacy of the coaching inn tradition. The market cross (Grade II\*) listed and the buildings behind it works with the topography to provide a visual anchor at the top of the High Street. The development of the old Fire Station into a restaurant is both sensitive and successful and demonstrates an appropriate response to the historic context. Peacock Mews, to the north also demonstrates how boutique shopping can be successfully integrated into historic alleyways, with courtyards along its length. There have been some unsympathetic demolitions and insertions on both sides of the High Street which in many cases detract from the generally attractive character.

2.25 The public realm in Leighton Buzzard town centre is generally of high quality with diverse and well maintained paving styles, public seating and some planting. This, combined with the historic character of the town, means that the shopping experience in the town centre is pleasant.



FIG. 2.13 High Street looking towards Market Cross



FIG. 2.14 Chain retailers on the High Street



FIG. 2.15 Formerly Mary Norton's House at the foot of the High Street



FIG. 2.16 The old Post Office, formerly a school

### Urban Design context: Historic Assets

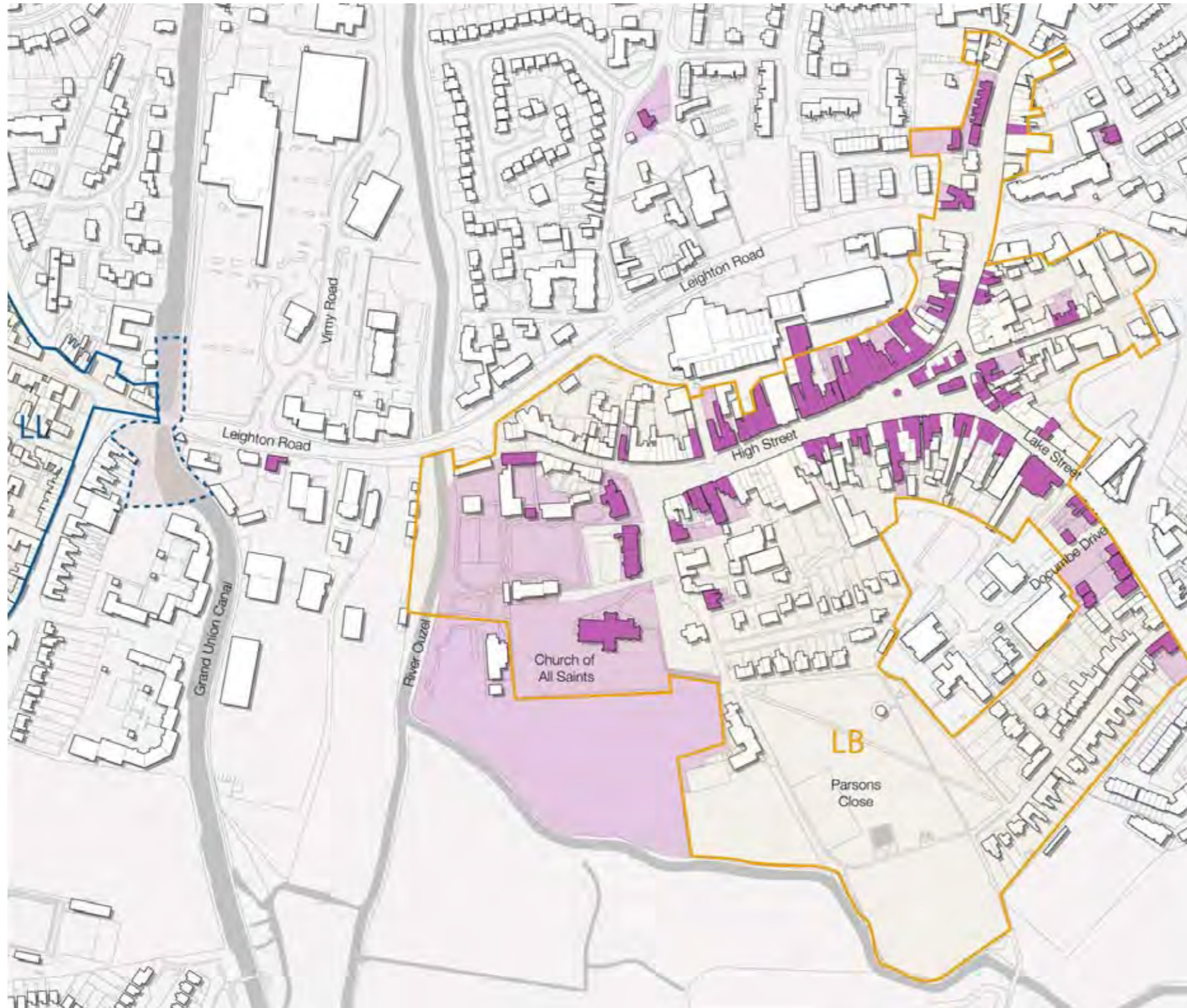


FIG. 2.17 Plan showing listed buildings and conservation areas, taken from the Baseline report

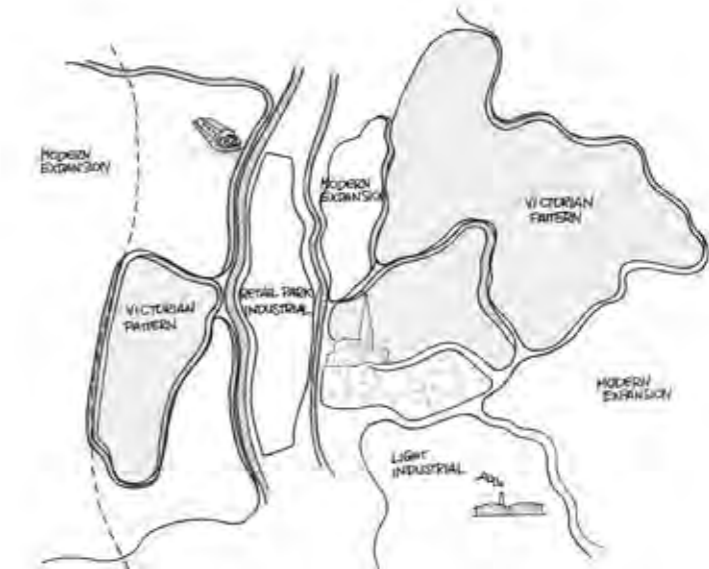


FIG. 2.18 Sketch showing the distribution of historic patterns of development in Leighton Buzzard, taken from the Baseline report

#### Key

- Listed buildings
- Curtilages of listed buildings
- Leighton Buzzard Conservation Area
- Linslade Conservation Area
- Linslade recent extension Conservation Area

Urban Design context: Linkages and integration



FIG. 2.19 Existing linkages between Leighton Linslade and the High Street and its surroundings, taken from the Baseline report

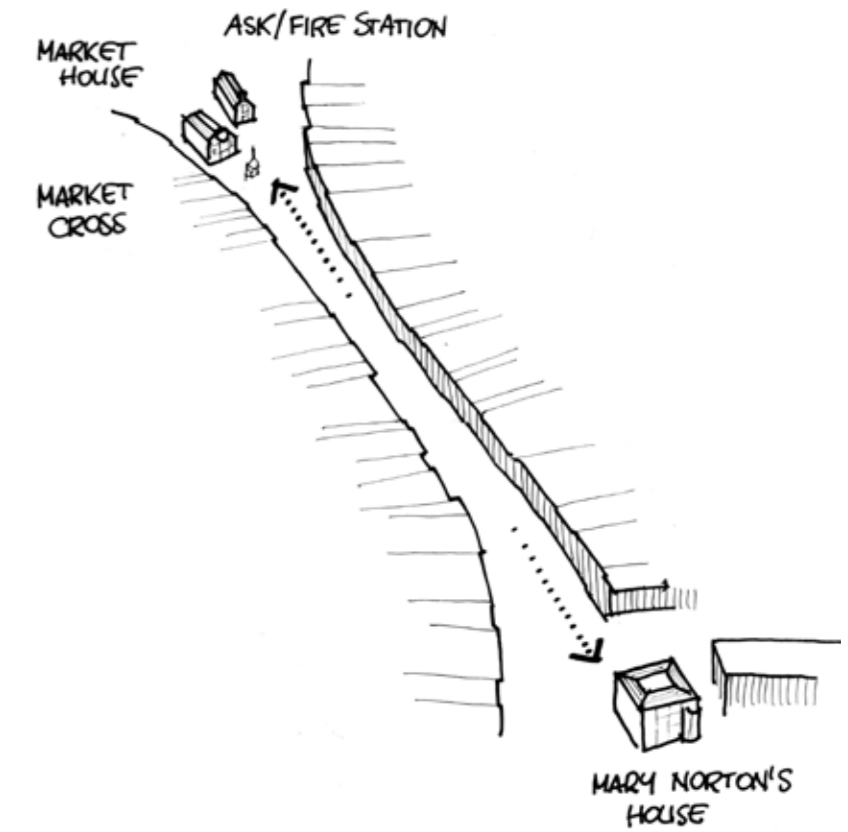


FIG. 2.20 Sketch section showing the strong form of the High Street, with historic anchors, taken from the Baseline report

Key

- Playground
- Square
- High Street
- Primary movement
- Secondary movement
- Formal / Informal footpath

### Urban Design context: Scale and Massing



FIG. 2.21 Figured-ground drawing highlighting the different development patterns in Leighton Buzzard, taken from the Baseline report

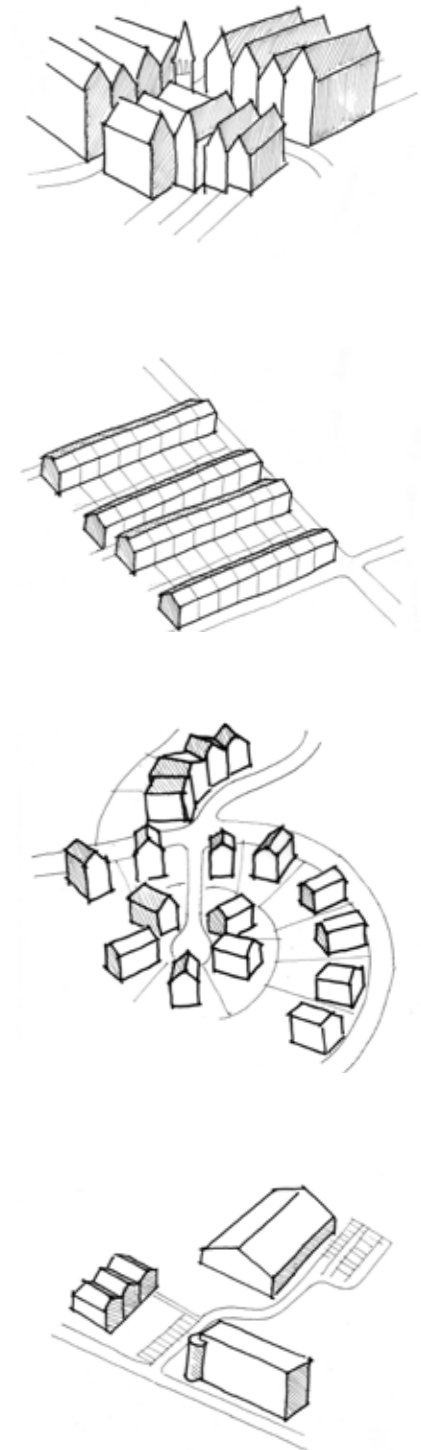


FIG. 2.22 Sketches of the typical development patterns of each era, from top: Medieval; Victorian; 20th Century residential; Light Industrial; taken from the Baseline report



### Planning Policy Framework

3.1 Figure 3.1, right provides an overview of the planning policy framework affecting the site:

3.2 The joint Core Strategy and all relevant documentation were submitted for Examination on the 8th March 2011 and an Exploratory Meeting was held on the 18th May 2011. Following the Exploratory Meeting and the agreement of the proposals to amend and take forward the Core Strategy by the Joint Committee on 24 June 2011, the appointed Inspector formally agreed to a six month deferral of the Examination process.

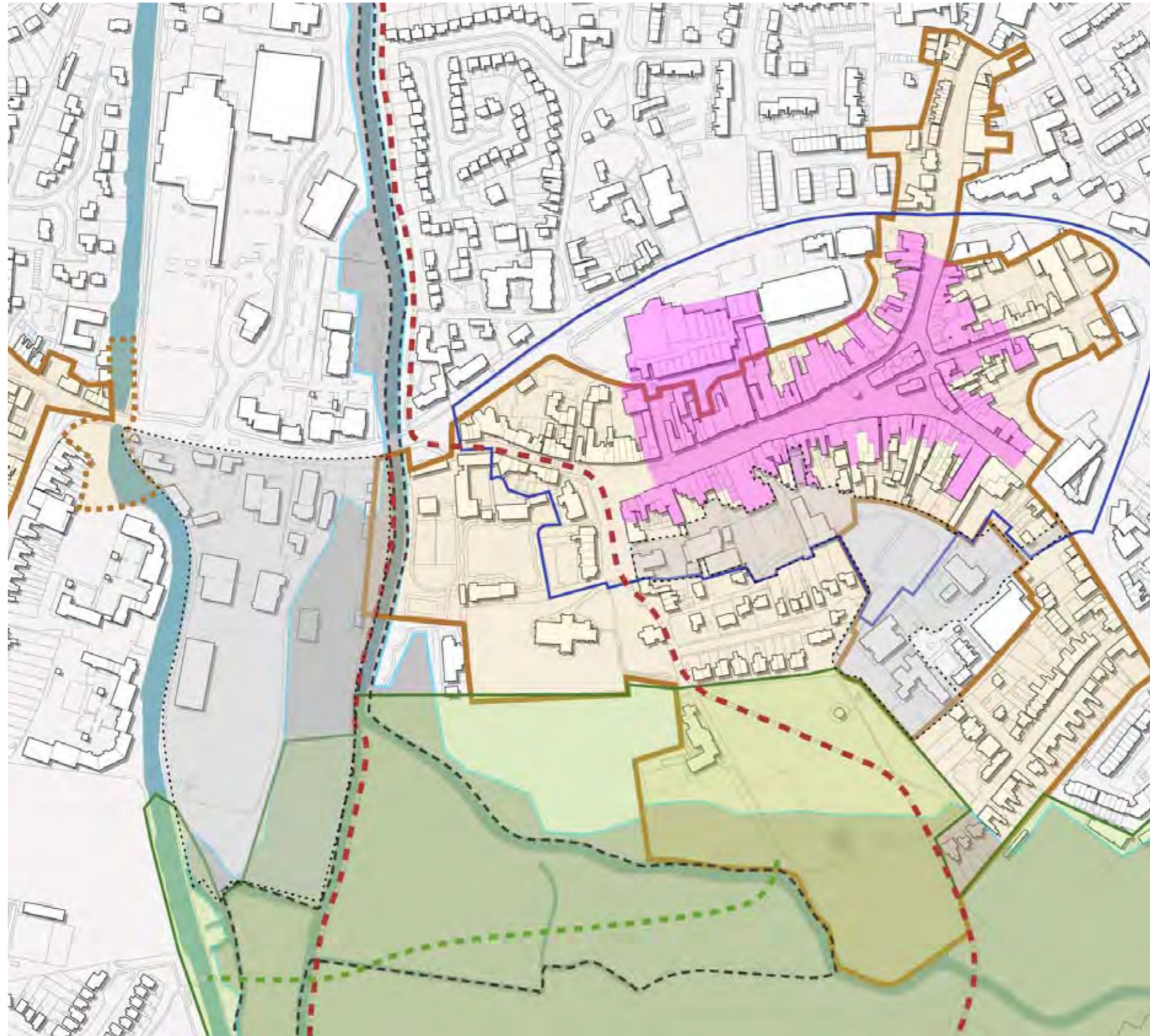
3.3 However, following a decision by Luton Borough Council not to support part of the Core Strategy, the Joint Committee on 29th July 2011 resolved to seek its withdrawal. The withdrawal was confirmed by the Secretary of State in a letter dated 7th September 2011.

3.4 Nevertheless, Central Bedfordshire Council remains fully supportive of the proposals contained within the joint Core Strategy and on 23rd August 2011 the Council's Executive resolved to endorse as guidance for Development Management purposes the Core Strategy and its underlying evidence base and technical studies.

3.5 On 27th May 2010, the Secretary of State for Communities and Local Government announced the Government's intention to rapidly abolish Regional Spatial Strategies. The Localism Act 2011 grants the Government the legislative powers to remove the East of England RSS. However, it has yet to do so and so the RSS will remain part of the statutory development plan affecting the sites until it is abolished (although material consideration will be given to the Government's intentions, particularly where conflicts arise with local policy).



FIG. 3.1 Planning Policy Framework



### Policy Designations

3.6 Figure 3.2, left, illustrates the policy designations affecting the site and surrounding area.

### Key

- Site boundaries
- Recent extension Conservation area
- Conservation area
- Main shopping area
- Town centre
- Town centre regeneration site
- Greenbelt
- Cycle route
- Proposed Ouzel Valley route
- County wildlife site
- Indicative floodplain

FIG 3.2 Planning Policy Designations from the Baseline report (information derived from Local Plan)



### Vision and Objectives

4.1 The draft Core Strategy sets an overarching vision for Leighton Linslade, as follows.

*'The Quality of Leighton-Linslade's town centre will be enhanced, building upon its strong and vibrant market town character. It will have improved employment opportunities, community facilities and green infrastructure provision with an environment that allows efficient and pleasant routes for movement through the area'*

4.2 With this as the context for the development brief, the Council's Vision and Objectives for the South of High Street site is set out on the right.

4.3 An overarching framework plan is provided at Figure 4.2 (overleaf), which underpins the more detailed guidance on land uses, urban design, landscaping, and access set out in subsequent sections.

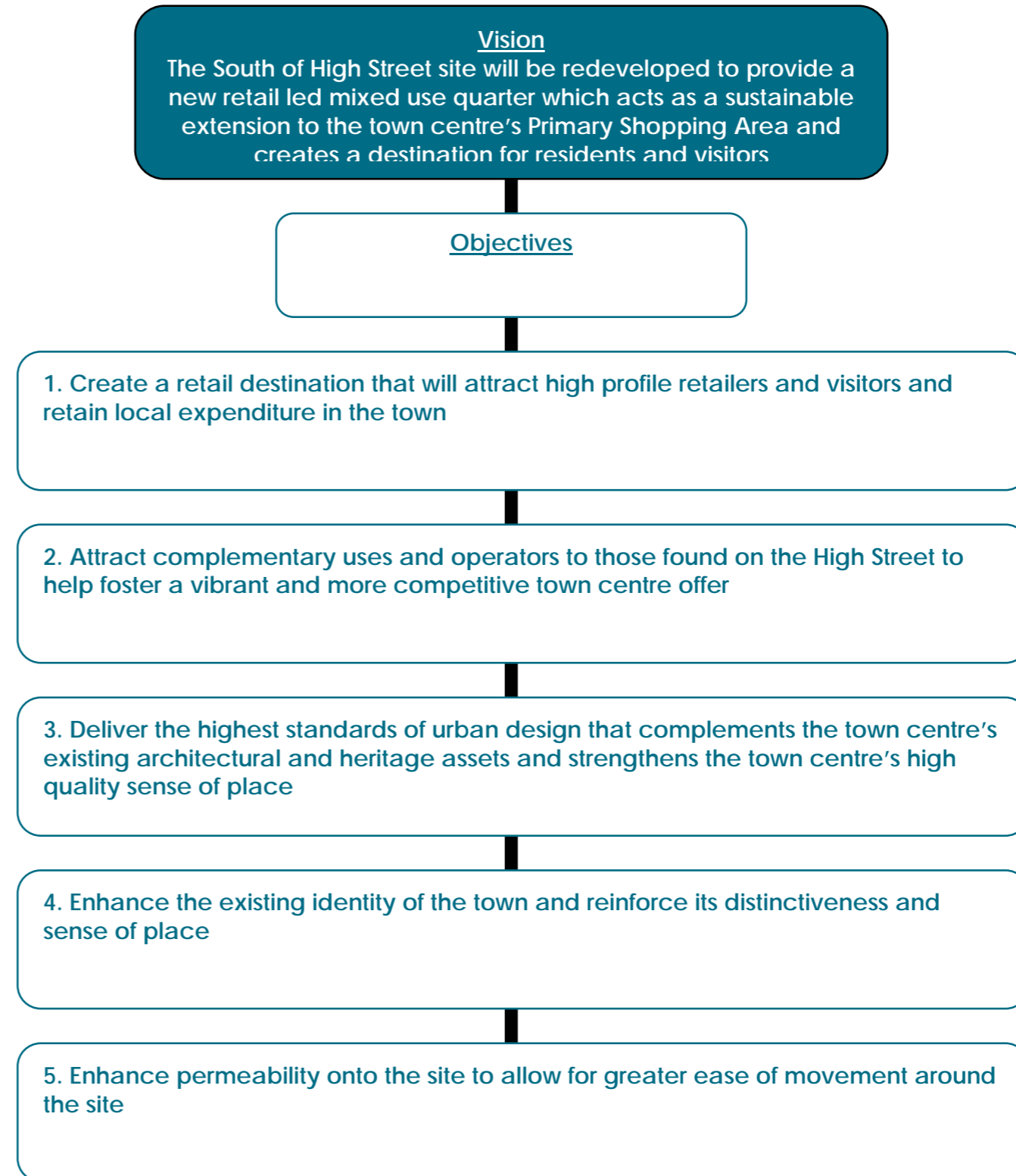


FIG 4.1 Vision and objectives for the South of the High Street site

Indicative Overarching Framework Plan



FIG. 4.2

Illustrative exemplar images



FIG. 4.3 The Lanes, Brighton



FIG. 4.4 St. Martin's walk mixed-use precinct, off the High Street in Dorking



FIG. 4.5 Duke of York Square, London



FIG. 4.6 Shopping centre, Windsor

### Illustrative exemplar images

Squares and courts



FIG. 4.7 Jubilee Square, Brighton



FIG. 4.8 Duke of York Square, London



FIG. 4.9 Lion and Lamb Yard, Farnham



FIG. 4.10 Gilet Square, London



### Land Uses

5.1 This brief proposes to create a new retail quarter for the town centre which is supported by ancillary uses including car parking, residential and leisure uses. The development principles set out below divide the site into a series of complementary land use parcels which should underpin the preparation of development proposals:

#### Parcel A: Retail Quarter

5.2 This area should provide an extension to the town centre's Primary Shopping Area where the following land uses are supported:

- Retail (Use Class A1). Retail floorspace should be arranged so as to form a continuous / seamless extension to the town centre's existing Primary Shopping Area and retail circuit. Retail development should address the quantitative and qualitative development needs identified in the Council's 2009 Retail Study (or any subsequent future updates) and should include a significant amount of new comparison goods retail floorspace including larger format stores. New convenience goods floorspace (in the form of a new small supermarket) is also supported as a potential anchor store. The amount of new floorspace should be commensurate to the size of the centre and should avoid significant adverse impacts on the vitality and viability of the existing town centre Primary Shopping Area.\*

\*The Council's 2009 Retail Study concludes that there is capacity to support an additional 2,500sqm of convenience goods retail floorspace and 6,900sqm of comparison goods retail floorspace in the period to 2016 (the comparison goods capacity figure rises to 12,400sqm by 2021). A revision to this retail study is currently being produced.

- Car parking. This should be of an appropriate scale to serve the needs of the development plus wider town centre needs, and should be informed by a wider town centre parking needs assessment. Suitable locations are shown on the plan at Figure 5.2.

- Food and drink uses (Use Class A3).

- Ancillary A2 (professional and financial services), B1 offices, cultural, community, further education and leisure uses will be permitted within this area provided they do not prejudice the development of a continuous, seamless extension of the Primary Shopping Area. As part of a comprehensive mixed use development of the site as a whole, residential uses (C2 and C3) may be appropriate, primarily at first floor level, or in a distinct area adjacent to existing residential development, outside the extended Primary Shopping Area. Piecemeal residential development will not be permitted

- The Council will work with the Bedfordshire and Luton Fire Service to investigate the potential for the future use of its site, including the potential to relocate the fire station off-site or opportunities for co-location of uses including parking.

#### Parcel B: Residential Quarter

5.3 The following land uses are supported:

- Housing (Use Class C3)
- Residential care home (Use Class C2)
- Town centre car park

#### Parcel C: Mixed Use Quarter

5.4 This area should accommodate a secondary mixed use area where the following mix of land uses will be supported:

- Retail (Use Class A1)
- Food and drink (Use Class A3)
- Civic, community and leisure uses (Use Classes D1 and D2)
- Housing (Use Class C3)
- Residential care home (Use Class C2)
- The existing post office should be retained.

Indicative Land Use Framework Plan

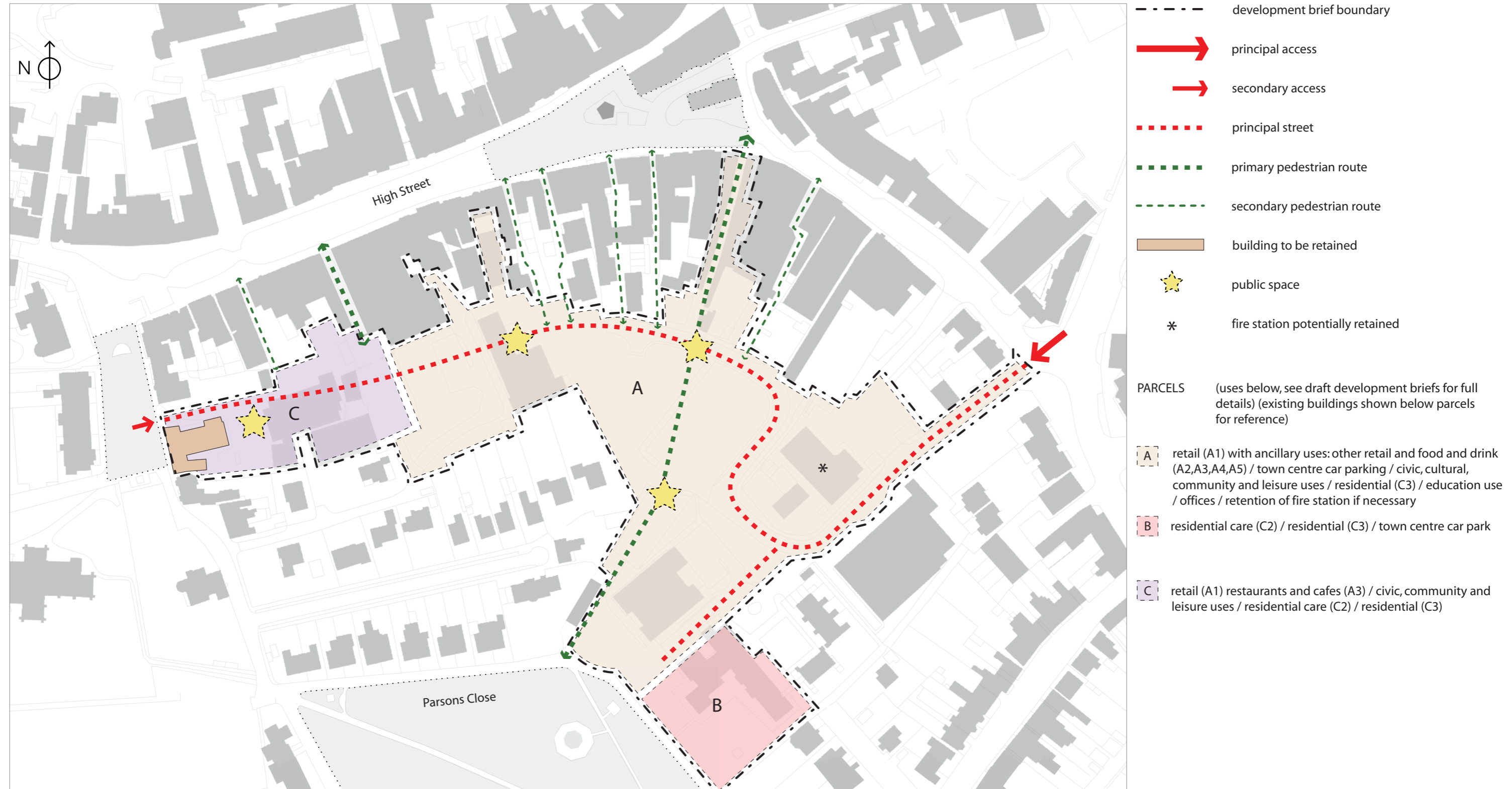


FIG. 5.1

Some potential alternative locations for multi-storey car parks



FIG. 5.2



FIG. 5.3 Multi-storey car park in Leipzig, Germany



FIG. 5.4 Multi-storey car park in Miami, USA

### Illustrative exemplar images

Mixed-use developments



FIG. 5.5 Princesshay quarter, Exeter



FIG. 5.6 Lyric Square, Hammersmith, London



FIG. 5.7 St Martin's Walk, Dorking



FIG. 5.8 Princesshay quarter, Exeter



### Urban Design

6.1 The Council seeks the highest standards of urban design which should complement the town centre's existing high quality character and local distinctiveness.

### Layout and Integration

6.2 The layout of the development should provide an attractive and successfully integrated extension to the Primary Shopping Area via a series of new linked streets and spaces, which should reflect the following:

- A new street (or 'lane') running east-west through the site should be provided. The lane should be treated as a street, with active and effective frontages to ensure definition and legibility and to provide an elevation to the rear of the buildings fronting the High Street. It should be designed using shared space principles to encourage and prioritise pedestrian movement and should include public spaces or courtyards along its length. These courtyards should provide smaller focus-points for new and reinforced north-south connections through to the High Street.

- In order to successfully integrate the new development with the Primary Shopping Area, pedestrian linkages to the High Street require strengthening in order to achieve a continuous active retail circuit through the town centre. This should include:

- Provision of a new north-south link towards the western end of the site with active frontages (the framework plans show an indicative location for this)

- Significant enhancement to Bell Alley to include the provision of active commercial frontages along its length – this will need to be sensitive to the Listed Buildings

- Enhancement of secondary alleys

- Some form of anchor store is anticipated to the south/east of the site which should act as a key footfall driver to draw pedestrians south of the High Street and should front onto a public square.

- The existing pedestrian route from the High Street through to Parson's Close should be retained (or re-provided along a similar route) in order to enhance connectivity between the park and the town centre.

- Additional co-ordinated signage to improve legibility.

### Scale and Massing

- The shape of the site allows for buildings suitable to accommodate larger format retail units throughout. The eastern part of the site offers the opportunity to accommodate bulkier buildings such as a larger anchor retail store and / or a multi-storey car parking structure.

- Surrounding building heights are typically 2-3 storeys (the church spire remains the dominant taller building in the town centre). The depth and slope of the site presents the opportunity for slightly taller buildings in the central and eastern parts of the site, providing that important views and surrounding residential amenity are carefully considered. The scale and massing of new buildings should gradually mediate from the historic form and grain of the High Street southwards.

- The scale and massing of new development should be designed so that the amenity of nearby residents is protected.

### Character, Appearance and Historic Assets

- Development should ensure that existing Listed buildings, the scheduled ancient monument, non designated heritage assets and the wider Conservation Area and their settings are preserved and enhanced. However, it is accepted that in order to achieve the most effective form of development, the setting of some Listed Buildings on the High Street may be affected, although this should be managed as sensitively as possible.
- The existing High Street frontage and façade should remain intact as far as is practicable, with the exception of the limited demolition of undesignated buildings of limited architectural merit which do not make a positive contribution to the character and setting of the Conservation Area. This is necessary to enable successful integration of the site with the Primary Shopping Area.
- The layout of development should respond to the historic pattern of burgage plots as far as is practicable. The Council recognises that this plot layout may not be practical (having regard to occupier requirements and the potential requirement for larger building floorplates), however architectural design solutions should be incorporated to achieve coherence with the site's burgage plot heritage. Key to the success of this approach will be sensitively designed roofscapes and architectural detailing to new external facades and shopfronts.

- Block layout should allow for larger stores as appropriate with opportunities taken for new development to mediate between the long, thin plots of the High Street and the larger, squarer plots that are likely to be required for new, commercial development.
- Active frontages, front doors and effective frontages should be carefully considered to support legibility, passive surveillance and accessibility throughout the public realm. Blank walls and unattractive facades (including those associated with multi-storey car parks) should be avoided (via the provision of active frontages, green walls or other attractive solutions).
- Development should seek to complement the existing architectural forms in the town, which are varied and lend the town its sense of place. Buildings should be articulated to achieve the principles of legibility outlined above.

### Sustainable Design and Construction

- The development should be designed to use less energy by adopting sustainable design and construction standards. It should also seek to supply energy efficiently by incorporating decentralised energy generation technologies and a site-wide heating/cooling network where feasible. Renewable energy sources should be used wherever practicable.

- Development should be adaptable to the effects of a changing climate by designing in natural shading, water efficiency technologies and infrastructure, and measures for sustainable drainage as well as green/brown roofs to reduce water runoff rates. Sustainable development principles should apply to both new-build and refurbishment works.

### Digital Infrastructure

- The Council believes that new developments should be served by a high quality digital infrastructure, ensuring local residents and business are able to access the latest online services. The Council wishes to see the necessary on-site infrastructure put in place at the time of construction, to ensure connectivity to superfast broadband services. This means that the development will seek to put in place an appropriate network to deliver services. Detailed proposals will need to consider the necessary conduits / ducting to be incorporated into the development and consideration for relevant telecommunications infrastructure, including exchanges and or cabinets, to ensure accessing / maintenance requirements and minimal environmental / visual impact in line with the adopted Central Bedfordshire Local Broadband Plan

Indicative Urban Design Framework Plan



Key

- development brief boundary
- principal access
- secondary access
- principal street
- primary pedestrian route
- secondary pedestrian route
- active / effective street frontage to define streets, routes and public spaces whilst retaining service accesses
- building to be retained
- fire station potentially retained
- public space
- development parcel
- sensitive redevelopment of historic alley required to strengthen link with the High Street whilst respecting the historic pattern
- sensitive frontage required to Parson's close

FIG. 6.1

### Illustrative images

#### Alleyways



FIG. 6.2 Entrance to Lion and Lamb Yard, Farnham



FIG. 6.3 Bell Alley, Leighton Buzzard



FIG. 6.4 Peacock Mews, Leighton Buzzard



FIG. 6.5 Sketch southern elevation of the High Street, showing historic townscape, with occasional insensitive insertions



FIG. 6.6 Composite photo of the same elevation

### Illustrative exemplar images

Scale and massing

#### Credits

FIG. 6.8 Hawkins Brown Architects

FIG. 6.11 Google images



FIG. 6.7 St Martin's Walk, Dorking



FIG. 6.8 Gilet Square, London



FIG. 6.9 Lion and Lamb Yard, Farnham



FIG. 6.10 Duke of York Square, London



FIG. 6.11 Jubilee Street, Brighton

### Illustrative exemplar images

#### Shared surfaces



FIG. 6.12 Shared surface, Brighton



FIG. 6.13 Mill Street, Bideford



FIG. 6.14 Shared surface, Norwich

Credits  
FIG. 6.12 Gehl Architects  
FIG. 6.13 Google images

Illustrative exemplar images:

Mews and Courtyards



FIG. 6.15 Peacock Mews, Leighton Buzzard



FIG. 6.16 The High Street Mews, Leighton Buzzard



FIG. 6.17 Whitecross Street, London



FIG. 6.18 Poundbury



FIG. 6.19 Barringtons, Leighton Buzzard

### Illustrative images

Historic landmarks and settings



FIG. 6.20 Houses overlooking Parson's Close



FIG. 6.21 Grade I listed Market Cross



FIG. 6.22 Church Square



FIG. 6.23 All Saints Church



FIG. 6.24 The old Post Office building (formerly a school)

Illustrative exemplar images

Sustainable design and construction



FIG. 6.25 Green walls



FIG. 6.26 Solar panels



FIG. 6.27 Green / brown roofs

### Illustrative sketches



FIG. 6.28 Illustrative vision for how alleyways could be integrated with continuous, new retail and mixed-use development



FIG. 6.29 Sketch perspective of potential new development



FIG. 6.30 Sketch perspective of potential for Bell Alley

### Illustrative sketches



FIG. 6.31 Illustrative vision for how frontage to Parson's Close could be developed



FIG. 6.32 Sketch perspective from Parson's Close

### Illustrative sketches



FIG. 6.33 Illustrative vision for how squares and courts could be developed

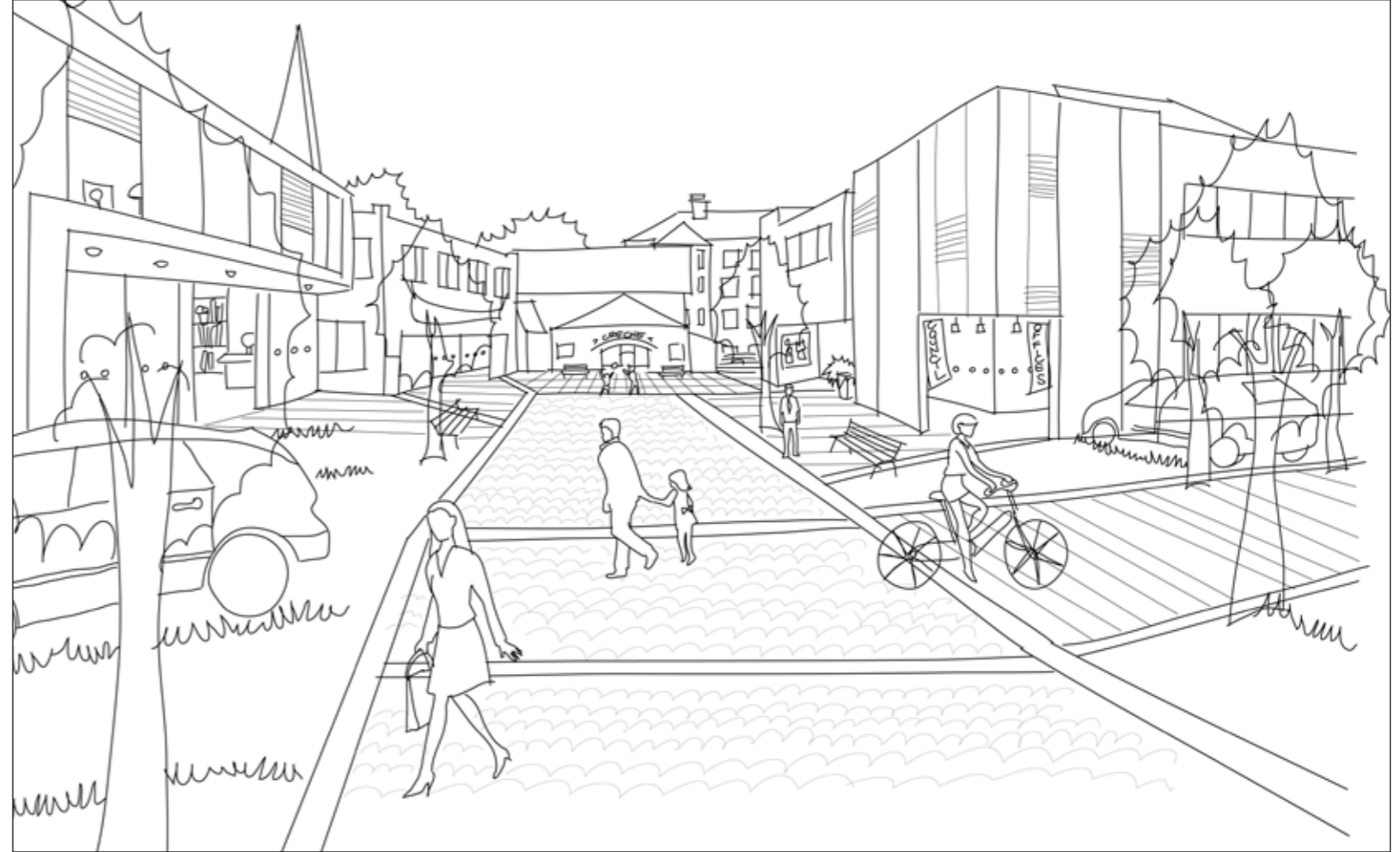


FIG. 6.34 Sketch perspective



FIG. 6.35 Sketch perspective



### Landscape

---

7.1 The topography, landscape and form of the wider town centre work together to generate the high quality sense of place and should be carefully considered in the planning of any development. Development proposals should reflect the following principles:

- The treatment of the public realm within the site has an important role to play in integrating new development with the existing Primary Shopping Area (and other surrounding areas) through complementary surface materials, building materials, and street furniture. Choice of materials and street furniture should be considered holistically and within the wider context, to complement the existing and to support the activities provided by the development.
- Streetscaping and tree planting should be provided throughout the development, which should complement the existing High Street.
- The existing pattern of alleyways and private rear courtyards provides a unique character that can be enhanced with new public spaces and pedestrian-friendly routes.
- Street furniture and wayfinding should be combined and minimised (where possible) a measure which can be facilitated through legible and accessible landscape design.
- Lighting should be carefully considered to provide a safe and pleasant environment at all times of day.
- Legibility and accessibility are key to the success of the public realm and the streets and spaces should be designed together with the buildings that front onto them to achieve these objectives.

### Indicative Landscape Framework Plan



FIG. 7.1

### Illustrative exemplar images

Hard landscaping and street furniture



FIG. 7.2 Tower Bridge Road, London



FIG. 7.3 Cambridge Botanic Gardens



FIG. 7.4 Tower Bridge Road, London



FIG. 7.5 Old Street, London



### Access and Movement

8.1 A key component of the framework is to create a permeable network of streets (or lanes), that enable pedestrians to move freely within the site. This permeable network is a feature of the oldest parts of the town centre and should be encouraged in all new proposals, helping to encourage walking and cycling as part of any development proposals and reducing dependence on the car.

8.2 Development proposals should be in line with the following principles:

- The site should be opened up via a new network of streets and spaces including a new street running approximately east-west across the site (indicative route shown in Figure 8.1). This street should be linked to the existing highway network at either end, with the most likely connections illustrated as being via Duncombe Drive to the east and with Church Square to the west (piecemeal development proposals within the site that prevent the creation of a through route will be unacceptable).
- The east-west route should be pedestrian friendly and as such should be designed using shared space principles to operate as a predominantly pedestrian space, with low vehicle speeds. The need to close this street to vehicular traffic during particular periods of the day should be reviewed as part of vehicular trip generation of any proposals.
- Street widths should vary along their length, and whilst separate footways would normally be provided, the carriageway surface should be designed to encourage its shared use by pedestrians if vehicle flows dictate. To keep traffic speeds low, the uninterrupted length of this route between junctions or events should be kept to around 60 metres. The aim should be to design in a naturally traffic calmed environment, rather than introduce additional hard speed control measures such as speed humps. The 'events' could include the creation of squares and courtyards, providing a horizontal shift in the street, changes in vehicle priority, informal crossings and the provision of planting in and around the highway.
- Changes in the road width and priority should be incorporated to help manage the amount and speed of traffic, and indicate the relative importance of the street within the road hierarchy.
- Drivers should be discouraged from using the east-west route other than for access to properties in this area, however, it is important to ensure that street widths are sufficient to allow essential service access where required. When setting the street hierarchy and appropriate street widths, guidance should be sought from Manual for Streets and Manual for Streets 2.
- Pedestrian permeability in this area should be increased through the provision of additional north to south pedestrian connections wherever possible, by enhancing

the existing alleyways and introducing new routes (where appropriate) and stitching these into the new network of streets and spaces. Areas of public space could provide smaller focus-points for these new north-south connections to link into the enhanced high street and proposed east-west route. These added pedestrian links could enable retail and leisure circuit routes and further encourage walking as a primary mode of transport within the town.

### Servicing

- The site offers the potential to accommodate larger format retail units including the potential for a small supermarket or other anchor store. Vehicle servicing for a supermarket is an important consideration, and may differ from the servicing strategy for the remainder of the site, given the likelihood of large, frequent movements. For the anchor store servicing should be positioned off-street, not require reversing within public spaces, and be located to protect neighbouring residential amenity and the visual impact on public spaces.
- For the remainder of the site, wherever possible a soft servicing design could be utilised, to minimise the impact upon the network and retain the pedestrian friendly ethos throughout the site. Instead of designated service bays this type of design could encourage on-street service bays, either integrated into the east-west route or within shared public squares - designed around the location and orientation of the buildings. Access to these bays,

depending upon the numbers predicted by a planning application, may be limited to access hours outside of peak pedestrian movements.

### Parking

- The development of the site should both re-provide the existing level of car parking located within the Duncombe Drive car park and a level of car parking suitable for the increased land-uses provided, as well as ensuring that enough spaces are provided to accommodate the vehicles of Market Traders. The additional number of car parking spaces would require review both in terms of adequacy for increased demand, but also in controlling additional car based trips following an increase in the towns accessibility by foot and cycle. As part of a planning application for additional town centre retail facilities, a study of existing town centre car park capacities and locations should be provided in conjunction with a retail impact study. All provision of parking spaces should be undertaken with the Central Bedfordshire parking standards in consideration.

- The most appropriate location for the main car park, which could be multi-storey, is considered to be at the eastern end of the site, accessed from Duncombe Drive. This would likely have the smallest effect on the existing town centre, and on the proposed east-west route, broadly being the location of an existing town centre car park. The Council will work with the Bedfordshire and Luton Fire Service to investigate the potential for the future use of its site, including opportunities for co-location of uses.

- Disabled car parking should be provided in accordance with the Central Bedfordshire parking standards. Consideration should be given to the location of these bays so as to provide convenient access throughout the town centre for the mobility impaired. Therefore these spaces could be provided through a combination of dedicated bays within any car park provided, or through the use of on-street bays designed within the landscaping on the east-west route.

- The provision of Car Club bays and car charging points should be investigated in discussions with Central Bedfordshire Council and locations where these could be introduced identified.

- Cycle parking should be provided in accordance with the Central Bedfordshire standards. On-street bays should be provided convenient to the facilities proposed and positioned so as to be in secure overlooked locations.

### Traffic Impact

8.3 The Council is aware that these proposals will have an impact on traffic levels in the area. Further work has therefore been undertaken by WSP on behalf of the Council to assess this impact, both in terms of any additional traffic attracted by the new development, and any reduction in traffic caused by the retention of trade in Leighton Buzzard which might normally leak to neighbouring towns.

8.4 The main conclusions of this study are below. In

clarification, 'comparison retail' refers to goods which are typically compared with one another by consumers in terms of quality and price e.g. clothing, household appliances and furniture & furnishings. 'Convenience retail' refers to goods such as food, drink and newspapers.

- Some 90% of comparison retail trips would be from existing residents, with the remaining 10% being from new residents.

- At peak times on a Friday, some 60% of car trips to comparison retail uses would be linked to a trip with another purpose. On a Saturday, the equivalent figure would be 50%.

- On an average day, of the trips estimated to travel to Milton Keynes some 300 - 350 would be drawn back to Leighton Buzzard. This would save an average of 6,000 to 7,000 vehicle kilometres per day, equivalent to some 350-400 tonnes of carbon per year.

- In the Friday PM peak, increases from retail uses are likely to be immaterial. On a Saturday, increases may be in the region of 5% to 8% at peak times. However the actual increase in traffic does not take traffic levels up to those of the existing weekday PM peak. Therefore, no material increase above existing PM peak traffic levels would be expected either on a weekday or Saturday.

- Employment trips could be controlled by limiting private non-residential car parking in the town centre

(subject to commercial considerations) and the Travel Plan which will be included in any planning consent. Employment trips have the greatest potential for effect on town centre highway capacity and a parking / sustainability strategy will be required as part of town centre detailed development proposals.

- Leisure trips are discretionary and can be managed through the particular type of leisure uses selected and the degree to which these would complement other uses on the site.
- The impact of existing retail trips into the town centre can be managed through the relocation of car parks, to provide convenient car parking on all main approaches to the centre.
- Wider town sustainability strategies (such as improved bus services) could also reduce traffic in the town centre.

### Indicative Access and Movement Framework Plan



FIG. 8.1



### Land Assembly

9.1 A comprehensive approach will be required to the delivery of the site to ensure a high quality of design and successful integration with the Primary Shopping Area.

9.2 Accordingly, the preferred option will be to assemble a single development site. However, the Council will accept the phased delivery of the development in line with the development parcels shown on the framework plans, as long as the development principles outlined in this brief are met and it can be demonstrated that phased development would not prejudice the comprehensive development of the whole site in due course.

9.3 Principal landowners have been consulted in the preparation of this draft brief and have expressed a general willingness to bring their land forward for redevelopment, subject to viability considerations. The ideal scenario will be to assemble the site via private treaty, however the Council's compulsory purchase (CPO) powers may be necessary to complete site assembly.

### Development Viability

9.4 The development brief has been prepared in the period 2010-11 during which time the UK was recovering from one of the deepest recessions since the 1930's. These recessionary conditions have been accompanied by a collapse in residential and commercial property values in

some parts of the UK, together with rationing of developer and mortgage finance. These conditions mean that viability is a serious challenge at the current point in time in all but the most exceptional of locations/schemes.

9.5 This brief has been informed by high level appraisals and commercial advice, including soft market testing with developers and retailers. This has concluded that the proposals set out in this brief are likely to be attractive to the market and viable in the short to medium term.

### Implementation

9.6 The Council recognises that major town centre developments have significant lead-in times and that their delivery is dependant on favourable economic conditions. Accordingly the Council anticipates that the development will come forward over the next 5 to 10 years or more.

9.7 The Council considers it inappropriate to apply rigid phasing or sequencing requirements to the delivery of the development. The development should come forward in a comprehensive manner – the Council will accept a phased delivery as long as proposals are able to demonstrate that they will not give rise to any adverse planning impacts.

9.8 Private sector developers will be responsible for delivering the development alongside existing landowners and the Council (as both landowner and Local Planning Authority). The Council will work with existing occupiers

to find appropriate alternative accommodation where appropriate.

### Planning Application Requirements

9.9 Planning applications should be supported by the following package of documents:

- Design and Access Statement
- PPS4 Statement (town centre uses)
- PPS5 Statement (heritage assets)
- Environmental Statement (if determined to be EIA development)
- Transport Assessment and Green Travel Plan
- Sustainability/Energy Strategy
- Other supporting documentation (as necessary).



# Central Bedfordshire Council

04 April 2024

## Corporate Resources Overview and Scrutiny Committee

### Land South of the High Street, Leighton Buzzard

#### Report of:

Cllr Steve Watkins, Executive Member for Business, Housing and Public Assets,  
[steven.watkins@centralbedfordshire.gov.uk](mailto:steven.watkins@centralbedfordshire.gov.uk)

#### Responsible Director:

Lorna Carver, Director of Place and Communities,  
[lorna.carver@centralbedfordshire.gov.uk](mailto:lorna.carver@centralbedfordshire.gov.uk)

#### Purpose of this report

To present the outcome of the consultation on plans to improve the areas South of the High Street - Leighton Buzzard and present the outcome of work resulting from the Motion passed at Full Council July 2023 "Land South of High Street. To support Executive in deciding how they wish plans for Land South of the High Street to proceed.

### RECOMMENDATION(S)

The Committee is asked to:

1. Consider and comment on the consultation report for Plans to improve the area south of the High Street.
2. Consider and comment on the outcome of work resulting from the motion carried at Full Council 20<sup>th</sup> July 2023 'Land South of the High Street'.
3. Consider and comment on the proposals to date for the area south of the High Street, Leighton Buzzard.

### Executive Summary

1. The redevelopment potential of the land south of the High Street Leighton Buzzard has been discussed and explored for a number of decades.
2. As the Council is building the £13M ultra-energy efficient Marigold House as a modern replacement for Westlands Care Home and Day Centre consideration can be given to the future use of the Westlands site along with the other parcels of Council owned land. The Council wants to make best use of these resources for the benefit of the town.
3. High streets nationally have been struggling, but Leighton Buzzards is performing well. The Council wants to protect and boost it by developing the Council owned land south of the High Street.

4. Market insight work had shown that, at this current time, the most likely demand for the land is residential led-mixed use. Residential would mean more people living, working and spending their money in Leighton Buzzard town which will help ensure the town continues to be a thriving, bustling and vibrant place.
5. Further redevelopment is likely to be new homes. A residential led mixed-use site could include a small amount of additional retail, whilst avoiding over-providing retail which could lead to empty units and undermine the success of the High Street. The Council carried out community engagement work which indicated there was a strong desire for a community / cultural facility in the town.
6. A study of public car parks across the town has shown that there is an overprovision of car parking spaces. Even on peak days parking spaces sit empty and the Council wants to make best use of underused car park spaces for the benefit of the town. Although Duncombe Drive car park is well used, because there is plenty of parking space elsewhere in the town, consideration is being given to releasing some of Duncombe Drive car park space to increase the amount of space that could be redeveloped.
7. The public were consulted on these findings through a consultation on plans to improve the area south of the High Street that took place for 12 weeks from the 10<sup>th</sup> March 2023 to the 2<sup>nd</sup> of June 2023. Subsequently at Full Council in July 2023 a motion was carried requiring further work to be carried out.
8. The culmination of all this work is a proposal to:
  - a) To reserve land sufficient for a large scale community / cultural facility / health facility for a period, and
  - b) To dispose of the remainder of the land to the market, including excess car park spaces.
9. This proposal is considered to provide the best balance reflecting the Councils ambition and scheme objectives, work that has been carried out, evidence gathered and views expressed by Ward Members and Town Council.
10. This item is on the forward plan for Executive 4<sup>th</sup> June 2024.

## **Background**

11. The redevelopment potential of the land south of the High Street, Leighton Buzzard has been discussed and explored for a number of decades.
12. The area comprises seven distinct areas, of which five are within the freehold ownership of Central Bedfordshire Council. As the Council is building the £13M ultra-energy efficient Marigold House as a modern replacement for Westlands Care Home and Day Centre, consideration can be given to the future use of the Westlands site along with the other parcels of Council owned land.

13. The Council commissioned work in 2022 to revisit assumptions that following the Covid pandemic it could be 2026 before the market recovers sufficiently to enable investment in land south of the High Street. Engagement took place with relevant Portfolio Holders, Ward Members and Leighton Linlade Town Council to understand the aspirations for the site leading to a set of working objectives that guided the subsequent work that are set out in the table below.

**Table to show working objectives**

<p>Scheme objectives</p> <ol style="list-style-type: none"><li>1. To deliver development on the site that complements and strengthens the performance of the town centre overall.</li><li>2. To consider all potential use options but likely focus on mixed use outcome with residential, commercial and leisure aspects.</li><li>3. To understand the realistic and deliverable use options and to rule out the “pipedreams”.</li><li>4. To deliver social, environmental and economic benefits as a priority to support the residents to Leighton Buzzard.</li></ol>
<p>Financial objectives</p> <ol style="list-style-type: none"><li>5. To achieve a viable, deliverable scheme – limited / no Council revenue funding available.</li><li>6. To secure a financial return for the Council where possible.</li></ol>
<p>Delivery objectives</p> <ol style="list-style-type: none"><li>7. To work with other landowners and stakeholders to develop proposals for the site – could acquire third party land holdings if needed / beneficial.</li><li>8. To deliver development in a timely manner, phased if necessary with quick win opportunities where possible.</li></ol>

**Evidence gathering**

14. Evidence was gathered to narrow down the number of potential uses.

**Market assessment**

15. This looked across the property market to understand the opportunities for the site and identify commercial demand. It considered existing strengths and weaknesses of the town; sales values for residential, rental values for commercial; appropriateness of the site based on location, connectivity and occupier requirements; and potential gaps in the market that this site could meet.

16. Using a traffic light Red, Amber, Green rating scale the market assessment identified a number of 'Green' opportunities which could be progressed. It identified a number of 'Amber' opportunities that are possible, but required more testing. And some 'Reds' which were not considered opportunities at this time and should be ruled out.

17. The conclusions of the study are set out in the table below:

**Table to show market assessment conclusions**

Rating	Use type
Green	<ul style="list-style-type: none"> <li>• Market sale houses</li> <li>• Elderly living</li> <li>• Hotel</li> </ul>
Amber	<ul style="list-style-type: none"> <li>• Retail convenience.</li> <li>• Flexible office space.</li> <li>• F&amp;B / Leisure.</li> <li>• Cultural / community use.</li> <li>• Affordable workspace.</li> <li>• Car parking.</li> </ul>
Red	<ul style="list-style-type: none"> <li>• Healthcare.</li> <li>• Market sales flats.</li> <li>• Build to rent.</li> <li>• Student accommodation.</li> <li>• Distribution / storage.</li> <li>• Offices.</li> <li>• Retail comparison.</li> </ul>

### **Car parking study**

18. This study analysed three years of ticket sales data across all Council owned car parks in the town centre. The data was validated using an Automatic Number Plate Reading (ANPR) camera survey.

19. The headline results of the survey were:

- Peak parking usage is Tuesday, market day.
- Capacity across all car parks in the town was never reached during study period, far below total capacity even at peak times.
- Closing Duncombe Drive car park outright would put the remaining facilities at 104% occupancy at the busiest 1-hour period; however they would still operate without undue issue for the remainder of the week.
- If 30% parking is retained at Duncombe Drive a 5% reserve capacity across remaining facilities is still available even at the busiest time.
- Market traders spaces are currently underutilised. Local information suggests the majority of market traders utilise the area known as the 'Cattle market' to park their vehicles on market days. A requirement of 30-40 users including some 7.5t vehicles was estimated by Leighton Linlde Town Council.

20. The car park study was published as part of the public consultation and can be found [here](#).

## Community / cultural study

21. The first part of the study sought to identify any gaps in ‘supply’ of community / cultural spaces by considering facilities within 10 minutes of the town centre and benchmarking this against Dunstable and Aylesbury. This found that Leighton Buzzard performs relatively well in terms of its number of town hall / civic spaces, places of worship and schools that provide spaces for activities. But there are specific types of spaces missing from the town centre when compared – some under provision in terms of arts / culture, the Library Theatre being the only space and of relatively limited capacity; and no facility to display history, no studio / gallery space for artists; space for rehearsals limited.
22. The second part of the study was to understand current and future demand.
23. A total of 67 community group / venue operators were engaged to inform this part of the study. This took place via 1-2-1 discussions with Leighton Linlade Town Council, two online workshops and community groups and venue operators, and a digital survey to understand issues and demand.
24. The headline results of the study are set out in the table below, with further information published as part of the public consultation and can be found [here](#).

**Table to show headline results of community / cultural study**

<b>Top sections of demand</b>	<b>Time of Demand</b>	<b>Type of Spaces Needed</b>
<ul style="list-style-type: none"> <li>• 68% of the respondents believe that a multi purpose community space is missing from Leighton Buzzard.</li> <li>• 48% think that there’s a need for an exhibition space.</li> <li>• 37% say that a performance space is missing from the town centre.</li> <li>• 36% say that there’s a need for workshop/studio space.</li> <li>• 27% believe that there’s a need for a youth centre.</li> <li>• 27% believe that there’s a need for a rehearsal space.</li> </ul>	<ul style="list-style-type: none"> <li>• 36% need a space during weekday evenings and 35% during weekday daytime.</li> <li>• 13% during weekend daytime.</li> <li>• 13% during weekday afternoon.</li> <li>• 34% find it easy to book a space.</li> <li>• whereas 35% think it depends on the day.</li> </ul> <p><b>Affordability</b></p> <ul style="list-style-type: none"> <li>• 79% consider their venues affordable.</li> </ul>	<ul style="list-style-type: none"> <li>• 74% would like to have access to a flexible community space suitable for various activities</li> <li>• 38% would like to have access to a kitchen</li> <li>• 26% would like to have access to a meeting room(s)</li> <li>• 15% would like to have access to a workshop/studio</li> </ul> <p><b>Condition</b></p> <ul style="list-style-type: none"> <li>• 66% say that the facility they use is in a good condition.</li> </ul>

## **Development scenarios / financial appraisal**

25. The output of the studies were used to generate four development scenarios to test land use types and the impact this would have on financial modelling.
26. Elderly living generated the strongest value; residential houses and flats also generated a positive value. Hotel use generated negative values having a 'drag' effect on models that included that use type.
27. Community / cultural use was flagged as risk because the operating model is unknown, therefore the viability was artificially modelled as 'break-even'. Further work would be required to understand whether community use could fund the cost of building and operating a community / cultural facility. Retail was also flagged as a risk, generating a slight positive value but operators have concerns over the visibility of the site.
28. The financial appraisal identified Duncombe Drive car park as a key variable on the financial viability of the scenarios. Scenarios where 100% and 50% of the car parking was retained generated a negative land value. Scenarios where no car park is retained, or 30% of the car park is retained generated a positive land value.
29. The Development appraisal by use type, and financial viability by land option is at Appendix A.

## **Public consultation**

30. A public consultation was launched sharing the information that informed the Councils proposal based on Scenario 3: To keep 30% (42 spaces) of the car parking space at Duncombe Drive car park and include 70% (97 spaces) of Duncombe Drive car park in the land available for development.
31. Overall levels of car parking would be retained at around 80% of the total current provision across the town, which aligned with parking study findings regarding the car parking capacity required.
32. The proposal was considered to strike the best balance between delivering the maximum benefits for the town, retaining positive community amenities such as car parking, and exploring a new community / cultural facility in the town centre without costing the tax payer.

## **The consultation process**

33. The consultation ran for twelve weeks from the 10<sup>th</sup> of March 2023 to the 2<sup>nd</sup> of June 2023. Local residents were encouraged to comment on the proposals by completing a short online survey. Paper response forms were also provided on request.
34. The following engagement activities for the consultation were held:
  - Saturday 25<sup>th</sup> March, at Leighton Buzzard Market.
  - Saturday 28<sup>th</sup> March, at Leighton Buzzard Market.
  - Wednesday 19<sup>th</sup> April, Webinar (booking required).
  - Thursday 20<sup>th</sup> April, Webinar (booking required).

## **Promotion of participation in the consultation**

35. The consultation was available on the Council's website consultation papers and news section from when it launched on the 10<sup>th</sup> of March 2023.
36. To reach the general public and people living in Leighton Linlade specifically, a number of promotional methods have been used.
37. Two email alerts were issued to email subscribers signed up for alerts about consultations, news and press releases, and news in Central Bedfordshire. The first email went out on 21 March 2023 to 26,933 subscribers and 43% opened it. The second email bulletin was sent on 22 May 2023 to 21,613 subscribers, and 43% opened the email.
38. Council ward members were notified by a dedicated email and the consultation events were shared with all members in their weekly newsletter.
39. Over 50 local community and voluntary sector contacts (such as Citizens Advice) and the Town Council were also notified via email.
40. Two press releases were sent to local media (print/online/radio/TV), as well as Town and Parish Councils (and their respective printed magazine editors) and other local publications. The first press release was issued on 21 February 2023 ahead of the consultation launching. The second press release was issued on 10 March 2023 to announce the consultation was live. The Executive Member for Planning and Regeneration was also interviewed for the Leighton Buzzard Observer newspaper. The Leighton Buzzard Observer published the interview w/c 13 March 2023.
41. A series of social media posts went out on the Council's three main channels (Facebook, Twitter/X and Instagram) throughout the consultation. The posts received 6,071 page impressions with 93 clicking the link on the posts. The Council also posted information about the consultation on local community Facebook pages, unfortunately, the reach and engagement on these posts are not available.
42. A poster advertising the consultation was produced which the Leighton Buzzard Library displayed for the duration of the consultation. The library was also provided with paper copies of both the consultation document and the questionnaire, which were made available to the public.
43. During the consultation, there were 2,239 views of the main consultation web page.
44. Two in-person engagement events in the community were held in Leighton Buzzard to assist those that may have questions or not want to respond digitally. They were chosen so that people may be out and about already, rather than having to go out especially – such as market days.
45. Two more engagement events were held online, to give people a further opportunity to ask questions.

## Consultation responses and feedback

46. A total of 703 responses were received for this consultation.
47. Of those responses, 60% don't use the Duncombe Drive car park at all, or less than weekly, 34% weekly, and 6% use it daily.
48. Respondents were broadly in favour of development of the site, with 62% agreeing that the site should be developed, and 65% highlighting the importance of incorporating a community / cultural facility into the development.
49. Concern around redevelopment surrounded the car park, with 79% of responses disagreeing that Duncombe Drive should be part of the redevelopment, and 76% preferring all spaces in the car park were retained.
50. Whilst the majority of the responses were supportive of the redevelopment of land south of the high street in Leighton Buzzard, and also saw the need for a community / cultural facility, they did not want this achieved by the reduction of spaces at Duncombe Drive car park which they saw as a much needed facility. Whilst there was some support for reducing the general parking spaces, permit holder and market trader spaces the majority did not want any spaces reduced at all. There was very little support for reducing any disabled spaces at this car park.
51. When asked to comment on other available car parks (West Street multi-story car park, New Road, Baker Street and Hockliffe Street) respondents believed they were either too far from the town centre or if the car park was considered near enough, there were issues with the maintenance, access, opening hours, payment methods or safety of the car park. There are five Council owned car parks in the town centre. The three closest to the town centre, West Street Multi-Story Car Park, Hockliffe Street and Duncombe Drive offer a range of tariffs from one hour to one week, as well as longer-term permits. The Council carries out condition surveys across its assets, and sets aside capital funding through its Build Asset Improvement Programme (BAIP) to invest in any condition works required.
52. The survey timings for the original car park study that was carried out were questioned as regular visitors to the town and / or users of Duncombe Drive car park said that if the study had only been carried out in the winter months this would not reflect how busy Duncombe Drive car park gets. Whilst the ANPR camera survey was carried out in winter, during the busy Christmas shopping period, this was only used to validate the analysis of a full three years of ticket sales data.
53. Respondents highlighted that during the summer months the car park is usually full due to activities in the nearby park, at its "splash park" or "the beach". The car park is also used for a school pick-up / drop-off at the local schools. To ensure the data is as accurate as possible, analysis of ticket sales data to the end of financial year 2023/24 has been carried out providing five full years of ticket sales data.

54. There was also a suggestion that at the time of the survey, the barrier may have been broken in the multi-story car park and people were parking there for free that would ordinarily have been parking in Duncombe Drive or the other car parks which indicates price rather than location as a determinant of car park preference and doesn't affect data around overall town centre car park usage.
55. There was a concern from disabled residents that the reduction / removal of parking spaces at Duncombe Drive car park will be detrimental as this is the car park used to access the town centre and shops, and that other car parks are too far away. The proposal is to retain 30% of the parking spaces at Duncombe Drive. Consideration can be given to increasing the number of disabled parking spaces within the retained parking.
56. Some said that all car parking is needed particularly with the amount of development in the town and also if the new facility at land south of the high street went ahead, that the people using this would need somewhere to park. There was a belief that taking away the car parking would have a detrimental effect on attracting visitors to the shops and therefore could have a knock on effect on local businesses. The car parking study reviewed any future of planned developments with the Leighton Buzzard area. The results of this did not identify any developments that would have a significant impact on the road network and parking provision. Any new facility at land south of the high street would need to meet policy requirements for car parking to achieve planning consent. Encouraging use of public / sustainable modes of transport will also help reduce parking demand throughout Leighton Buzzard.
57. Respondents said they believed that there was no need for further housing, as part of the redevelopment or if there was to be residential development, that the infrastructure needed to be in place first. Respondents fed back that throughout the consultation free comments that they believe that Leighton Buzzard needs a health hub or medical facility and GP practice, and many believed that this should take precedence over any other development at land south of the high street.
58. The full consultation response is available at Appendix B.

### **Work arising from motion carried at Full Council 20<sup>th</sup> July 2023**

59. At Full Council 20<sup>th</sup> July 2023 a motion proposed by Cllr Harvey – Land South of the High Street was carried. The motion can be found at Appendix D. The outcome of the work arising from the motion is to be reported back to the Executive committee as the relevant decision making committee for those matters.
60. The specific actions arising were:
- a) For the Portfolio Holder and Director of Place and Communities to meet with Ward Members / Town Council to discuss points 1-3 in the motion.
  - b) To speak again with Land owners about their appetite to work across the whole of land south of the high street.
  - c) To speak to the Integrated Care Board (ICB) about health provision.
  - d) To speak to the Arts Council about live funding opportunities.

61. The Portfolio Holder and Director of Place and Communities met with Ward Members and Town Council representatives on the 7<sup>th</sup> of November 2023.

62. At this meetings, Ward Members and Town Council were update on the below, and a broader discussion about aspirations, cost and funding took place.

- a) In relation to the future bids to the Levelling Up Fund the situation was as set out in the response to the written question from Cllr R Goodchild to Full Council 20<sup>th</sup> July 2023; namely that the Governments criteria for the second round stated that if you had been successful in the first round, which Central Bedfordshire Council was, you would not be successful in the second round of bidding. The Government has not yet set the criteria for the third round of bidding or when this might take place.
- b) In relation to the Towns fund, this has been replaced by the 'Long term plan for Towns' and no towns in Central Bedfordshire are deemed a priority to benefit from funding.
- c) In relation to Cultural Development fund / Arts Council England, Central Bedfordshire is not a priority area, and does not feature in plans for levelling up Culture to funding opportunities are considered unlikely.
- d) That discussions had taken place with one private land owner who was would be willing to work across the whole of the land south of the high street. It had not been possible to contact the other landowner.
- e) That discussions had taken place with the Integrated Care Board. The ICB is currently completing an Outline Business Case regarding potential additional health services in Leighton Buzzard. They have assessed a number of site options, and are due to share findings in May. It is our understanding that the Land South of the High Street has been assessed to have greater complexity around delivery, significantly longer timescales, and higher costs (e.g. acquisition and demolition) than other options they are considering, so the ICB is unlikely to recommend proceeding with the site.

63. A follow-up meeting took place with nominated Ward Members and Town Council representatives on the 17<sup>th</sup> February 2024 where the information outlined in this Executive paper was shared.

## **Options for consideration**

64. To propose to Executive to do nothing and continue discussions with stakeholders. This has been discounted as there is a viable proposal that meets the Councils aspiration and scheme objectives for the site.

65. To propose Executive:

- a) To reserve land sufficient for a large scale community / cultural / health facility for a period.
- b) To dispose of the remainder of the land to the market, including excess car park spaces.

66. This proposal is considered to provide the best balance in terms of reflecting the work that has been carried out, the evidence gathered, views expressed by Ward Members and Town Council, and the scheme objectives.

67. Should Executive agree this proposal, it:-

- a) provides protection that the land is reserved for a defined period of time to enable the Town Council / local stakeholders to bring forward a viable business case to fund deliver and operate a community / cultural facility. There is a risk that identifying funding and an operator may not be achieved, and there is no benefit to residents in the meantime.
- b) Responds to feedback from Town Council / Ward Members that whilst it may not be viable to deliver other facilities on the site currently, conditions may change in the future. This is deciding to 'do-nothing' on part of the site pending changing conditions. There is risk in that there is no benefit to residents now, no evidence to suggest that conditions will change in the short / medium term.
- c) Disposing of the remainder of the site generates footfall to support the High Street / town centre and generates a capital receipt to the Council. The amount of car parking disposed of would reflect the updated car parking study.

### **Reason/s for decision**

68. As the Council is building the £13M ultra-energy efficient Marigold House as a modern replacement for Westlands Care Home and Day Centre, consideration can be given to the future use of the Westlands site along with the other parcels of Council owned land.

### **Council priorities**

69. Provide the environment for economic prosperity in which existing businesses can grow and new ones will move to the area – the proposals for land south of high street are intended to protect and boost the high street which is performing well in comparison to high streets nationally. Residential use would mean more people living, working and spending their money in Leighton Buzzard town to ensure the town continues to be a thriving, bustling and vibrant place. In the short term, development of the site will generate construction jobs.
70. Get the right homes in the right places and ensure housing growth and infrastructure are carefully considered – at this current time, the most likely demand for land disposed of is residential led mixed-use, providing sustainable town centre living.
71. Enable people to live active, healthy and independent lives – the proposal enables enhances community / cultural facilities, and other not yet identified amenities to be delivered in the town centre.

## Implications

### Legal Implications

72. Where a Local Authority is contemplating changes to the delivery of services to the public it may have a public law duty to consult with those that would be affected and there is clear guidance and precedent about how consultation should be conducted and the part that the public play in future decision making.
73. The general principles derived from case law as to how consultations should be conducted, known as the “Gunning principles” are: consultation should occur when proposals are at a formative stage; consultations should give sufficient reasons for any proposal to permit intelligent consideration; consultations should allow adequate time for consideration and response. ***There must be clear evidence that the decision maker has considered the consultation responses, or a summary of them, before taking its decision.***
74. In the Supreme Court case of **R (Moseley) v LB Haringey (2014)**, the Supreme Court endorsed the Gunning principles and added two further general principles: the degree of specificity regarding the consultation should be influenced by those who are being consulted; and the demands of fairness are likely to be higher when the consultation relates to a decision which is likely to deprive someone of an existing benefit.
75. An Executive Report with an appended Consultation Report will be presented to the Council’s Executive Committee in June to provide the information required to make a decision. The Consultation Report will support the recommendation within the Executive Report and will contain the responses to the consultation, an analysis of the responses, and the Council’s consideration of these responses.
76. Section 123 of the Local Government Act 1972 provides that the Council may dispose of its land as it chooses but, except in the case of a short tenancy, the consent of the Secretary of State is required if it is intended to dispose of land at less than the best consideration that can reasonably be obtained.
77. To ensure the Council complies with its ‘Section 123 duties’, the normal approach would be for the property to be exposed to the open market and appropriate valuation, legal and other advice obtained on the results of that marketing exercise. It is possible to fulfil the Section 123 duty without going to the open market but, regardless of the process, appropriate advice must be taken before any offer is accepted to ensure it represents the best consideration reasonably obtainable as required by Section 123.
78. Insofar as the Council may wish to take account of factors other than monetary consideration in reaching a final deal, this is permissible up to a cash limit of £2M in value where the other factors contribute to the social, economic or environmental wellbeing of the Council’s area (or part of it). Such factors would need to be clearly identified and their impact (if any) on consideration quantified in the Council’s valuation advice
79. Pathfinder Legal Services or suitable external lawyers procured with Pathfinders legal services assistance will be instructed to deal with the legal documentation relating to the disposal providing advice throughout, including the contract drafting to ensure the transaction proceeds as envisaged and in accordance with the heads of terms agreed.

## **Financial and Risk Implications**

80. The financial objectives of the scheme are to achieve a viable, deliverable scheme – limited / no Council revenue funding available; and to secure a financial return for the Council where possible.
81. Sale proceeds from the disposal of assets are used to finance new capital expenditure, thereby reducing the Council's need to borrow. If the estimated capital receipts in future years do not materialise, this would increase the Council's requirement to borrow to fund its planned Capital Programme. However there is no reliance on disposal of these sites to meet the Council's MTFP capital receipts target. Whilst the proposal was assessed to generate a positive land value, it is subject to broader market conditions and increasing construction costs which could erode any potential receipt.
82. There is provision within the Council's Medium Term Financial Plan for costs associated with site preparation for market (surveys and reports, planning, legal, valuation leading to planning application, capital works including demolition). Staff costs, and cost of sale are met by the gross receipt received subject to a limit of 4%.
83. There is no other Council funding in place to deliver this proposal.

## **Equalities and Fairness Implications**

84. Central Bedfordshire Council has a statutory duty (i.e. public sector equality duty – PSED) in respect of nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
85. The statutory grounds of the public sector equality duty are found at section 149 of the Equality Act 2010 and are as follows: A public authority must, in the exercise of its functions, have due regard to the need to:
- i. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - ii. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - iii. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
86. Decision makers should have due regard to Public Sector Equality Duty in making their decisions. Consideration of the duties should precede the decision. It is important that Executive have regard to the statutory grounds in the light of all available material. This duty should be considered with information gathered during the consultation process and from the Equality Impact Assessment.
87. An Equalities Impact Assessment will be developed and presented to Executive to support their decision making.

88. The process so far has already identified there are opportunity to increase disabled parking spaces in town centre, to enable new community / cultural facilities, and other public amenities that meet modern planning / building regulations for accessibility.
89. The consultation has been widely promoted through a wide range of digital and engagement networks and channels. Material to promote the consultation were placed in public places and shared with the Town Council.
90. In person and online community engagement events were held to answer questions relating to the consultation and to encourage residents to participate in the consultation.
91. Paper copies of the consultation document and questionnaire were made available to people who are unable to submit an online response.
92. Results of the consultation have been carefully analysed by protected characteristics to ascertain the extent to which proposals impact on different groups and to ascertain the extent to which alternative proposed solutions will be appropriate or require further consideration.

## **Biodiversity and Sustainability Implications**

93. Any new developments resulting from this proposal will be subject to Council planning policy.

***Policy T1: Mitigation of Transport Impacts on the Network (CBC Local Plan 2015-2035)***

*It should be demonstrated how the proposal will seek to reduce the need to travel and secure a modal shift towards sustainable forms of transport. This should be through an approach which first considers the ability to cater for walking and cycling, provide suitable public transport services, and make better use of existing highway capacity before considering the provision of additional roads.*

94. Whilst the results of this exercise did not identify any agreed or proposed developments in the area that would have a significant impact on the road network and parking provision within Leighton Buzzard, encouraging the use of sustainable modes of transport will also help to reduce parking demand throughout Leighton Buzzard, whilst also improving the health of the residents through cycling and walking initiatives.
95. The Council is considering adoption of Local Cycling Walking Infrastructure Plans (LCWIPs) at Executive April 2024 which will set out the Councils plan for investment in sustainable modes of transport.
96. Any new development would have to comply with Policy CC1: Climate Change & Sustainability which says that new development will be required to demonstrate:
  - A reduction in carbon dioxide emissions by at least 10%, based on emissions rates determined by Part L of the Building Regulations applicable at the time of the application;
  - How opportunities to use renewable and low carbon sources have been maximised;
  - The minimisation of water usage to achieve the higher water efficiency standard of 110 litres per person per day as a minimum for residential development and the BREEAM 'very good' standards for water efficiency for all other development;

- A water sensitive approach to the design and the incorporation of measures, such as grey water recycling and water butts, that further promote water efficiency and aim to achieve water neutrality;
- How the performance gap between built and designed energy use will be negated;
- And incorporate adaptation measures to achieve flood resilience to impacts of climate change.

## **Conclusion and next Steps**

97. The proposal is considered to provide the best balance reflecting work that has been carried out, evidence gathered, views expressed by Ward Members and Town Council, and scheme objectives.

98. This item is on the forward plan for Executive 4<sup>th</sup> June 2024.

## **Appendices**

Appendix A: Development appraisal by use type, and financial viability by land option

Appendix B: Plans to improve the area south of the High Street – Leighton Buzzard. Consultation results.

### **Report author(s):**

Iain Berry, AD - Assets, [iain.berry@centralbedfordshire.gov.uk](mailto:iain.berry@centralbedfordshire.gov.uk)





**Intelligent Plans**  
and examinations

# **Report on the Sandy Neighbourhood Development Plan 2021-2035**

**An Examination undertaken for Central Bedfordshire Council with the support of Sandy Town Council on the July 2025 submission version of the Plan.**

Independent Examiner: Derek Stebbing BA(Hons) DipEP MRTPI

Date of Report: [**Fact Check Version 26 February 2026**]

Intelligent Plans and Examinations (IPE) Ltd, Office 10, 5 Argyle Street, Bath BA2 4BA

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

## Contents

<b>Main Findings - Executive Summary</b> .....	4
1. Introduction and Background .....	4
The Sandy Neighbourhood Plan 2021-2035 .....	4
The Independent Examiner.....	6
The Scope of the Examination.....	6
The Basic Conditions .....	7
2. Approach to the Examination .....	8
Planning Policy Context.....	8
Submitted Documents .....	9
Examiner Questions .....	9
Site Visit .....	12
Written Representations with or without Public Hearing .....	12
Modifications.....	12
3. Procedural Compliance and Human Rights.....	13
Qualifying Body and Neighbourhood Plan Area .....	13
Plan Period .....	13
Neighbourhood Plan Preparation and Consultation .....	13
Development and Use of Land.....	15
Excluded Development .....	15
Human Rights .....	15
4. Compliance with the Basic Conditions .....	15
Assimilated Obligations.....	15
Main Assessment .....	16
Synopsis .....	17
Specific Issues of Compliance .....	19
Community .....	20
Natural Environment .....	23
Historic Environment.....	26
Local Businesses and Agriculture .....	28
Transport and Rights of Way.....	29
Sustainable Development.....	30
Aspirations, Implementation and Monitoring.....	31
Appendices .....	32
Other Matters.....	32
Concluding Remarks.....	33

5. Conclusions..... 33  
Summary ..... 33  
The Referendum and its Area ..... 33  
Overview ..... 33  
Appendix: Modifications ..... 35

## Main Findings - Executive Summary

From my examination of the Sandy Neighbourhood Plan (the Plan) and its supporting documentation including the representations made, I have concluded that subject to the modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- the Plan has been prepared and submitted for examination by a qualifying body – the Sandy Town Council (the Town Council);
- the Plan has been prepared for an area properly designated – the Sandy Neighbourhood Area;
- the Plan specifies the period to which it is to take effect – from 2021 to 2035; and,
- the policies relate to the development and use of land for a designated neighbourhood plan area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

## 1. Introduction and Background

### The Sandy Neighbourhood Plan 2021-2035

- 1.1 Sandy is a town and a civil Parish within Central Bedfordshire. It lies 13 kilometres to the east of Bedford, 29 kilometres to the south-west of Cambridge and 69 kilometres north of Central London. The A1 trunk road bypasses the town of Sandy to its west, whilst the East Coast Main Line runs to its east. Sandy railway station is served by the Great Northern service from London to Peterborough. Central Bedfordshire Council designated the whole of the Parish as a neighbourhood area on 13 January 2021.
- 1.2 The Parish had a population of 12,171 at the 2021 Census, with 11,375 persons living within the built-up area of Sandy. The town of Sandy takes its name from a low range of sandy hills on the eastern side of the town, which form part of the Bedfordshire Greensand Ridge. The main part of the built-up area lies between the hills to the east and the River Ivel to the west. The Parish also includes the hamlets of Beeston and Seddington, alongside the A1 to the south of the town. The town is conjoined on its western side by its suburban area of Girtford.
- 1.3 Historically, Sandy was a Roman settlement, and was a walled town. After the Romans left, Sandy formed part of the Kingdom of Mercia, and

Intelligent Plans and Examinations (IPE) Ltd, Office 10, 5 Argyle Street, Bath BA2 4BA

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

the Manor of Sandeia, as being the area now known as Sandy, is recorded in the Domesday Book. The present-day Parish of Sandy (excluding Beeston) still traces the same area as the original Manor. By the 18th and 19th centuries, the rich farming land around Sandy was being used for extensive market gardening, with growers sending their produce to the London markets, initially by the Great North Road (now the A1) and later by the Great Northern Railway which served Sandy.

- 1.4 The population of Sandy grew steadily from 1,115 in 1801 to 3,110 in 1901. Sandy Parish Council was established in 1894, and in 1974 the Parish Council became the Sandy Town Council. The major period in the town's expansion commenced after the Second World War and extended through to the 1990's. Sandy was designated as an area for London overspill housing, and an overspill housing scheme was developed to the north-west of the town centre, and further residential developments have since taken place on the northern side of the town, in the areas between the A1 trunk road and the railway line.
- 1.5 Sandy town centre is a relatively compact area, with the main retail and commercial uses focused on the High Street and Market Square. The adopted Central Bedfordshire Local Plan designates Sandy as a Secondary Town Centre, with a defined Town Centre Boundary. The Neighbourhood Plan has reviewed this boundary, and proposes its extension southwards along the High Street. Sandy is well served by community and leisure facilities, with four Primary Schools, the Sandy Secondary School, four churches including the Parish Church of St. Swithun which is a Grade II\* listed building and a wide range of leisure facilities including the Sandy Sports Centre, four recreation grounds and a skatepark.
- 1.6 The Parish also has a wide variety of important heritage assets, including 49 Grade II listed buildings and structures, including Hazells Hall which is a Grade II\* listed building with a Grade II Registered Park and Garden. There are three Scheduled Monuments within the Parish. A Conservation Area, which was designated in 1978, covers Sandye Place and its grounds and much of the Market Square, High Street and Bedford Road in the town centre.
- 1.7 The local economy is now less dependent on agriculture and has diversified to now include a wide range of light industrial and heavy industrial uses, including some high technology industries. The larger employers are based at employment areas at Sunderland Road, Sand Lane, George Town and Seddington. The adopted Central Bedfordshire Local Plan allocates an additional site for employment development at Beamish Close. The Royal Society for the Protection of Birds (RSPB) has its headquarters at Sandy Lodge.
- 1.8 The landscape character of the Parish contains a number of distinctive areas. In the north-west of the Parish, the Great Ouse Clay Valley is a wide valley containing some large open waterbodies, including a number of restored sand and gravel workings. Further south, the Lower Ivel Clay

Valley is an open river valley including the River Ivel and its floodplain. The Everton Heath Greensand Ridge in the south-east of the Parish is typified by its elevated undulating landscape containing some large areas of woodland, open areas of heathland and fields used for arable farming. This area includes the Sandy Warren Site of Special Scientific Interest (SSSI) which protects an area of heathland. There are also a number of County Wildlife Sites and a Local Nature Reserve within the Parish. The southern half of the Parish is within the Greensand Ridge Nature Improvement Area.

## The Independent Examiner

- 1.9 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Plan by Central Bedfordshire Council (the Council), with the agreement of the Sandy Town Council
- 1.10 I am a chartered town planner, with over 50 years of experience in planning. I have worked in both the public and private sectors and have experience of examining both local plans and neighbourhood plans. I have also served on a Government working group considering measures to improve the local plan system and undertaken peer reviews on behalf of the Planning Advisory Service. I therefore have the appropriate qualifications and experience to carry out this independent examination.
- 1.11 I am independent of the Qualifying Body and the Local Authority and do not have an interest in any of the land that may be affected by the Plan.

## The Scope of the Examination

- 1.12 As the independent examiner, I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
  - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
  - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.13 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
- Whether the plan meets the Basic Conditions.
  - Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:

- it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
  - it sets out policies in relation to the development and use of land;
  - it specifies the period during which it has effect;
  - it does not include provisions and policies for 'excluded development'; and
  - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
  - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations').

1.14 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

### The Basic Conditions

1.15 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with, and not breach, assimilated obligations<sup>1</sup>; and
- meet prescribed conditions and comply with prescribed matters.

1.16 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Neighbourhood Plan does not breach the requirements of Chapter 8 of

---

<sup>1</sup> See: The Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023, which replaced the previous reference to 'EU' obligations.

Part 6 of the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations').<sup>2</sup>

## 2. Approach to the Examination

### Planning Policy Context

- 2.1 At the date of this examination, the adopted Development Plan for this part of the Central Bedfordshire area, not including documents relating to excluded minerals and waste development, is the adopted Central Bedfordshire Local Plan 2015-2035 (CBLP) (adopted July 2021).
- 2.2 The Plan area is also covered by the Minerals and Waste Local Plan – Strategic Sites and Policies (adopted January 2014), prepared jointly by the Council, Bedford Borough Council and Luton Borough Council. Some of the policies supersede those set out in the Bedfordshire and Luton Minerals and Waste Local Plan – First Review (adopted January 2005), prepared by the former Bedfordshire County Council, which remains as part of the Development Plan for development management purposes.
- 2.3 Central Bedfordshire Council is presently undertaking a review of the CBLP, and the Council's latest Local Development Scheme (LDS) (January 2025) indicates a Regulation 18 Issues and Options consultation on the Local Plan Review for February-April 2026 and that the Regulation 19 Pre-submission consultation is scheduled for September/October 2027. In response to Question No. 6 (see paragraph 2.8 below), the Council has confirmed that the preparation of the Local Plan Review is progressing in accordance with the LDS, and that this review was commenced within six months in accordance with Policy SP1a in the adopted Local Plan. Taking account of the advice in the Planning Practice Guidance (PPG) with regard to an emerging local plan<sup>3</sup>, the review of the CBLP is not yet at an advanced stage of preparation, and I have not considered any implications for this Plan arising from that review in my main assessment.
- 2.4 The Basic Conditions Statement (at Pages 7 and 8) provides an assessment of how each of the policies proposed in the Plan are in general conformity with the relevant strategic policies in the adopted CBLP. The draft Plan includes a sub-section on its future Monitoring and Review in Section 13 which I consider satisfactorily addresses the potential need to formally review the Plan in light of the emerging Local Plan Review or any changes in national policy.
- 2.5 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The PPG offers guidance on how this

---

<sup>2</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

<sup>3</sup> PPG Reference ID: 41-009-20190509.

policy should be implemented. Unless otherwise stated, all references in this report are to the December 2024 NPPF and its accompanying PPG.

## Submitted Documents

2.6 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:

- The submission version of the Sandy Neighbourhood Plan 2021-2035 and its six Appendices (July 2025);
- the Basic Conditions Statement (May 2025);
- the Consultation Statement and Appendices A-D (Undated);
- the Strategic Environmental Assessment (SEA) Screening Determination Statement (August 2024) and the Habitats Regulations Assessment (HRA) Screening Assessment Report (at Annex 1 to the Strategic Environmental Assessment (SEA) Screening Report (May 2024)); and
- all the representations that have been made in accordance with the Regulation 16 consultation.<sup>4</sup>

2.7 I have also considered the supporting evidence documents that have informed the preparation of the Plan, including the following:

- Sandy Town Centre Improvement Study (The Transportation Consultancy) (March 2023);
- Former Sandye Place School Site – Masterplanning Studies (AECOM) (June 2023);
- Sandy Design Guidance and Codes – Final Report (AECOM) (October 2023);
- Proposed Local Green Space Designations for Sandy (Bedfordshire Rural Communities Charity) (March 2024);
- Sandy Green Infrastructure Plan (Bedfordshire Rural Communities Charity) (June 2023); and
- Sandy Neighbourhood Plan – Green Spine (Sandy Town Council) (Undated).<sup>5</sup>

## Examiner Questions

2.8 Following my appointment as the independent examiner and my initial review of the draft Plan, its supporting documents and representations made at the Regulation 16 stage, I wrote to the Council and the Town Council on 3 November 2025<sup>6</sup> seeking further clarification and information on six matters contained in the submission Plan, as follows:

- Firstly, with regard to Policy NE3 (Local Green Spaces) and Appendix B (Policies Maps), I acknowledged that Figure 19 at Appendix B identifies

---

<sup>4</sup> View at: [Neighbourhood planning | Central Bedfordshire Council](#)

<sup>5</sup> View at: [Neighbourhood Plan | Sandy Town Council](#)

<sup>6</sup> View at: <https://www.sandytowncouncil.gov.uk/wp-content/uploads/sites/117/2025/11/Examiner-Procedural-letter-and-questions>

the location of the proposed ten Local Green Spaces, but I did not consider that it is sufficient to identify with clarity the boundaries of each of the proposed Local Green Spaces, in relation to their immediate surrounding areas and adjoining properties etc. This is necessary to enable users of the Plan and property owners to clearly identify the boundaries and extent of the Local Green Spaces. I considered that a series of Inset Maps is necessary at a larger scale than that of Figure 19 to meet this requirement. They should be on an Ordnance Survey base map, and at a scale of 1:1250 or 1:2500 although that may not be possible for Site No. 8 (Sandy Disused Railway County Wildlife Site), in which case a map at a scale of 1:5000 should be appropriate. I considered that these Inset Maps should be added to Appendix B to follow Figure 19. I therefore requested that the Qualifying Body provide me with a set of Inset Maps for the proposed Local Green Spaces as described above, that I may consider as a potential modification to the draft Plan. I acknowledged this may require the technical assistance of the Council as holders of the relevant Ordnance Survey licence for the area.

I further noted that I had reviewed the report entitled 'Proposed Local Green Space Designations for Sandy' (prepared by the Bedfordshire Rural Communities Charity in March 2024). This does contain Inset Maps of the various sites but, unfortunately, they are not on an Ordnance Survey base map and are also not to scale.

- Secondly, with regard to Policy LB1 (Supporting Local Business and Agriculture), I noted this policy states that proposals for new employment generating uses on existing sites and within the Settlement Envelope, will be encouraged in line with Local Plan policies. I requested that the Qualifying Body confirm that the Settlement Envelope described in this policy relates to the Settlement Envelope defined by Policy SP7 in the adopted Central Bedfordshire Local Plan (July 2021), as shown on Inset Map 49 to the Local Plan Policies Map. I further noted that the Local Plan (as part of Policy EMP1) allocates three sites for employment development at Sandy, being Land North of Beamish Close, Land North of Sunderland Road and Land West of Girtford Bridge. There is a brief mention of two of these sites at paragraph 10.3. These three sites are within the Settlement Envelope defined on Inset Map 49 to the Local Plan Policies Map. It was my assessment that the draft Plan should include rather more specific references to Local Plan Policies SP7 and EMP1 as they affect Sandy, possibly as an extended paragraph 2.7, for the benefit of future users of the Plan. I invited the Qualifying Body to consider this matter, and provide me with a Note that includes draft text for revisions to paragraph 2.7 in the Plan, and/or at any other points in the Plan that may be appropriate, that I may consider as a potential modification to the draft Plan.
- Thirdly, with regard to Appendix D (Local Heritage Assets), from my initial assessment of the draft Plan, I viewed the information contained

at Table 4 within Appendix D as being largely insufficient for me to be able to assess whether the 32 buildings and structures listed therein are worthy for protection as non-designated heritage assets (NDHAs) in accordance with draft Policy HE1. By way of further explanation, I noted that there is very little detail on any distinctive features of architectural and artistic interest, particularly reflecting the local area, and site Nos. 28-32 would appear to contain no assessments against the criteria contained in Historic England Advice Note 7. It was possible that there is supporting study existed, which I had not seen, that contained much further information and detail regarding the various buildings and structures. If so, I requested that the Qualifying Body provide me with a copy. However, I had not been able to identify such a study on the Town Council's website. In the event there was not a supporting study or assessment, I also requested that the Qualifying Body provide me with a full Note that sets out further information, if possible, with accompanying photographs, regarding each of the 32 building and structures, that I may then consider as part of this examination. I confirmed that I would view each of the buildings and structures during the course of my site visit.

- Fourthly, with regard to the Former Sandye Place Academy, Park Road, Sandy, representations had been submitted to the draft Plan on behalf of Central Bedfordshire Council (the Council), in its capacity as landowner. These representations raised significant objections to Policies C2 and NE3 in the draft Plan. Specifically, the Council seeks the modification of Policy C2 (Sandye Place) to allow for a mix of uses, including housing, employment and community facilities; to treat the 2023 Masterplan for the site as being advisory; and to require proposals to demonstrate their deliverability and viability. The Council also seeks the deletion of the proposed Local Green Space designation for 'Sandye Place Grounds' under Policy NE3 (Local Green Spaces). I understand that similar such representations had been made at the Regulation 14 consultation stage in October 2024. Before I consider these representations as part of my detailed assessment of the draft Plan, I invited the Qualifying Body to consider the Council's Regulation 16 submission (including its Appendices) and provide me with a Note on any further points that it may wish to make regarding the objections that had been raised, ahead of my detailed assessment. I confirmed that I would visit the former Sandye Place Academy site during the course of my site visit.
- Fifthly, with regard to the Sandy Design Guidance and Codes, I noted that Central Bedfordshire Council (the Council) had made some extensive comments on the content of the Sandy Design Guidance and Codes report, which was prepared by AECOM in October 2023. My initial assessment was that the Council's comments should be addressed by the preparation of an Addendum which draws attention to the supplementary matters and information that are being raised by the Council through its comments, for the benefit of future users of the report. I therefore requested that the Qualifying Body take full account

of the comments that had been raised by the Council and provide me with the text of a draft Addendum that could be added to the Design Guidance and Codes report, with a suitable cross-reference within the draft Plan. I acknowledged that this may require the confirmation and agreement of AECOM, as the authors of the report, that this would be an appropriate way of addressing the Council's points.

- Finally, with regard to the Central Bedfordshire Local Plan Review, I requested that the Council confirm that the Central Bedfordshire Local Plan Review is progressing in accordance with the timetable contained at Appendix 2 of the Council's latest Local Development Scheme (LDS), dated January 2025.

2.9 In response to my letter of 3 November 2025, the Council and the Qualifying Body provided me with responses to the questions on 30 December 2025 and 16 January 2026 respectively.<sup>7</sup> I have taken account of the additional information contained in these responses as part of my full assessment of the draft Plan, alongside the documents listed at paragraphs 2.6 and 2.7 above.

### Site Visit

2.10 I made an unaccompanied site visit to the Neighbourhood Plan Area on 29 November 2025 to familiarise myself with it and visit relevant sites and areas referenced in the Plan, evidential documents and representations.

### Written Representations with or without Public Hearing

2.11 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections and comments regarding the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum. I am satisfied that the material supplied is sufficiently comprehensive for me to be able to deal with the matters raised under the written representations procedure, and that there was not a requirement to convene a public hearing as part of this examination. In all cases the information provided has enabled me to reach a conclusion on the matters concerned.

### Modifications

2.12 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications in full in the Appendix.

---

<sup>7</sup> View at:

[https://www.centralbedfordshire.gov.uk/info/45/planning\\_policy/473/neighbourhood\\_planning](https://www.centralbedfordshire.gov.uk/info/45/planning_policy/473/neighbourhood_planning)

Intelligent Plans and Examinations (IPE) Ltd, Office 10, 5 Argyle Street, Bath BA2 4BA

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

### 3. Procedural Compliance and Human Rights

#### Qualifying Body and Neighbourhood Plan Area

- 3.1 The draft Plan has been prepared and submitted for examination by Sandy Town Council. The Town Council submitted an application to the Council in September 2020 for a neighbourhood area to be formally designated. The neighbourhood area application was approved by the Council on 13 January 2021. The designated neighbourhood area comprises the whole of the Parish of Sandy.
- 3.2 The submission Plan contains a map (Figure 1) of the designated area at Page 3. The Sandy Neighbourhood Plan is the only Neighbourhood Plan in the designated area.
- 3.3 The Town Council is the designated body for the preparation of the Plan. The preparation of the Plan has been co-ordinated by a Neighbourhood Plan Steering Group, which was formed in late-2020.

#### Plan Period

- 3.4 The draft Plan specifies on its front cover and on Page 1 the period to which it is to take effect, which is from 2021 to 2035. This aligns with the end date of the adopted Central Bedfordshire Local Plan.

#### Neighbourhood Plan Preparation and Consultation

- 3.5 The Consultation Statement and its four Appendices sets out a full record of the Plan's preparation and its associated engagement and consultation activity. The decision to undertake the preparation of the Neighbourhood Plan was taken by the Town Council in September 2020, alongside the application for the designation of the neighbourhood area. This application was approved by the Council in January 2021, following public consultation.
- 3.6 The preparation of the draft Plan has involved five key stages. Stage 1 was the initial pre-engagement work within the Sandy community and the identification of the key issues and themes that the Plan would need to address. This work was undertaken during 2021, and included a public questionnaire survey, extensive use of social media platforms and attendance at key events within Sandy, such as the Craft Market and the Summer Market. A business questionnaire survey was undertaken in Summer 2021. Appendices A and B to the Consultation Statement set out the analyses of the Public Questionnaire Survey (which received 310 responses) and the Business Questionnaire Survey (which received 27 responses) respectively.
- 3.7 Stage 2 extended through 2022 and involved the analysis of the survey results and work on a number of the key issues that the residents and

businesses of Sandy had identified. Four working groups were established to gather evidence to support the preparation of the draft proposed policies to be included in the Plan. Community engagement was maintained throughout this stage, including attendance at local events such as the Sandy Carnival and the Summer Market, in order to keep residents informed and updated on the progress of the Plan.

- 3.8 Stage 3 extended throughout 2023 and into Spring 2024. The focus during this period was on the preparation of the draft Plan and its supporting studies. A number of reports from external consultants were commissioned, including the Former Sandye Place School Site Masterplanning Studies (AECOM) (June 2023), the Sandy Design Guidance and Codes (AECOM) (October 2023) and the Sandy Green Infrastructure Plan (Bedfordshire Rural Communities Charity) (June 2023). The draft Plan was submitted to the Council in early-2024 for Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening, and the Council published its Screening Report in May 2024, which concluded that the draft Plan did not require a full SEA to be undertaken and that it did not require an Appropriate Assessment to be undertaken in accordance with the Habitats Regulations.
- 3.9 Stage 4 was focused on the publication of the draft Plan for Regulation 14 Pre-submission public consultation for a period of six weeks from 23 August to 7 October 2024.<sup>8</sup> The consultation was accompanied by extensive local publicity, a questionnaire, letters to many local organisations and specific consultations to key stakeholders and statutory bodies with interests in Sandy. A total of 7 responses were received. The consultation responses that were received are fully recorded at Appendix D of the Consultation Statement and, in the case of the statutory consultees and other stakeholders, at Appendix A to the Consultation Statement.
- 3.10 Stage 5 commenced following the Regulation 14 Pre-submission consultation and involved amendments to the draft Plan, where considered appropriate, to take account of the responses received during the consultation. Where such changes were made by the Steering Group is also summarised at Appendix D to the Consultation Statement. The Town Council resolved to submit the draft Plan to the Council for examination at its meeting held on 23 June 2025.
- 3.11 The Consultation Statement provides a comprehensive record of the community engagement and consultation that was undertaken during the preparation of the Plan, including summaries of the various issues that were identified during the engagement process.

---

<sup>8</sup> It should be noted that Central Bedfordshire Council at [Neighbourhood planning | Central Bedfordshire Council](#) record the Regulation 14 consultation as having taken place from 15 July to 2 September 2024. However, I have cited the dates contained in the Town Council's Consultation Statement (undated) at Page 22.

3.12 Regulation 16 consultation was then held for a period of six weeks from 15 August to 26 September 2025. I have taken account of the comments that were received from 14 respondents during that consultation, as well as the Consultation Statement. Additionally, I have taken account of the detailed comments on the submission draft Plan that were made by a number of departments within the Council. I am satisfied that a transparent, fair and inclusive consultation process has been followed for the Plan, that has had regard to advice in the PPG on plan preparation and engagement, and is procedurally compliant in accordance with the legal requirements.

### Development and Use of Land

3.13 I am satisfied that the draft Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

### Excluded Development

3.14 From my review of the documents before me, the draft Plan does not include policies or proposals that relate to any of the categories of excluded development.<sup>9</sup>

### Human Rights

3.15 Neither the Council nor any other party has raised any issues concerning a breach of, or incompatibility with Convention rights (within the meaning of the Human Rights Act 1998). From my assessment of the Plan, its accompanying supporting documents and the consultation responses made to the Plan at the Regulations 14 and 16 stages, I am satisfied that the Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. I consider that none of the objectives and policies in the Plan will have a negative impact on groups with protected characteristics. Many will have a positive impact.

## 4. Compliance with the Basic Conditions

### Assimilated Obligations

4.1 The Council issued a Strategic Environmental Assessment (SEA) Screening Report in May 2024 and a Screening Determination Statement in August 2024 in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations'). The Screening Report and Screening Determination Statement were submitted alongside the draft Plan and, in summary, the Determination Statement (at Section 7) concludes that, on the basis of the screening assessment that was

---

<sup>9</sup> The meaning of 'excluded development' is set out in s.61K of the 1990 Act.  
Intelligent Plans and Examinations (IPE) Ltd, Office 10, 5 Argyle Street, Bath BA2 4BA  
Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

undertaken, it is unlikely there will be any significant environmental effects arising from the Sandy Neighbourhood Plan and that, as such, the Plan does not require a full SEA to be undertaken. The results of the Screening Assessment were the subject of consultation with the Environment Agency, Natural England and Historic England, but no responses were received to that consultation.

- 4.2 I have considered the SEA methodology by which the Plan was duly screened to determine whether the Plan is likely to have significant environmental effects, bearing in mind also that the policies in the adopted CBLP were also subject to separate Sustainability Appraisal at various stages. Overall, I am satisfied that a proportionate approach has been taken and that the Plan was screened to take full account of any potential environmental effects upon interests of importance in the Plan area.
- 4.3 The Plan was also screened by the Council in May 2024 in order to establish whether the Plan required a Habitats Regulations Assessment (HRA) in accordance with the Habitats Regulations. There are no sites of European importance within the Plan area. However, there are nine sites within 50 kilometres of the Central Bedfordshire boundary, the closest of which to the Plan area being the Eversden & Wimpole Woods Special Area of Conservation (SAC).
- 4.4 The HRA Screening Report, which is contained within the SEA Screening Report, concludes (at Paragraph 7.5) that the draft Plan is unlikely to have significant impact on European sites, and that, as such, the draft Plan does not require an Appropriate Assessment to be undertaken under the Habitats Regulations 2017. I have also noted that Natural England (in its Regulation 16 consultation response) has not raised any concerns regarding the necessity for an HRA.
- 4.5 Therefore, I consider that on the basis of the information provided and my independent consideration of the SEA and HRA Screening Assessments and the SEA Screening Determination Statement, dated 16 August 2024, and the Plan itself, I am satisfied that the Plan is compatible with those assimilated obligations that are relevant to the Sandy Neighbourhood Plan.

## Main Assessment

- 4.6 The NPPF states (at paragraph 30) that "*Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan*" and also that "*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*". The NPPF (at paragraph 11) also sets out the presumption in favour of sustainable development. It goes on to state (at paragraph 13) that neighbourhood plans should

support the delivery of strategic policies contained in local plans; and should shape and direct development that is outside of these strategic policies.

- 4.7 Having considered above whether the Plan complies with various legal and procedural requirements, it is now necessary to deal with the question of whether it complies with the remaining Basic Conditions (see paragraph 1.15 of this report), particularly the regard it pays to national policy and guidance, the contribution it makes to sustainable development and whether it is in general conformity with strategic Development Plan policies.
- 4.8 I test the Plan against the Basic Conditions by considering specific issues of compliance of the Plan's 14 policies, which address the following themes: Community; Natural Environment; Historic Environment; Local Business & Agriculture; Transport and Rights of Way; and Sustainable Development. As part of that assessment, I consider whether the policies in the Plan are sufficiently clear and unambiguous, having regard to advice in the PPG. A policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.<sup>10</sup> I recommend some modifications as a result.

## Synopsis

- 4.9 The Plan is addressing a period up to 2035 and seeks to ensure that Sandy has a sustainable future where people of all ages and abilities can thrive and enjoy the green spaces and amenities. Sections 7-12 of the Plan contains specific policies in respect of each of the themes listed above.
- 4.10 Section 1 of the Plan provides an introduction to the Plan following the designation of the neighbourhood area in January 2021. It briefly describes the process for preparing a neighbourhood plan and the role of the draft Plan and its Policies in taking forward the community's wishes for the future of the Parish up to 2035. Figure 1 in this section shows the Parish boundary and the designated neighbourhood area boundary.
- 4.11 Section 2 of the Plan, entitled 'The Strategic Policy Context', describes the national and local policy context for the preparation of the draft Plan, noting that the Plan must contribute to the achievement of sustainable development and be in general conformity with the strategic policies of the Local Plan.
- 4.12 Section 3 of the Plan, entitled 'Parish Description' provides a comprehensive history of the Parish, together with details of its educational and recreation facilities and key socio-economic, population and household data.

---

<sup>10</sup> PPG Reference ID: 41-041-20140306.

4.13 Section 4 of the Plan, entitled 'Consultation' sets out a summary of the consultation and engagement that was undertaken during the preparation of the Plan, following the formation of the Neighbourhood Plan Steering Group in November 2020. It contains a chronology of the consultation events that took place between May 2021 and June 2024 and a series of pictograms containing key data derived from the pre-engagement questionnaire survey during Stage 1 of the Plan's preparation (see also paragraph 3.6 above).

4.14 Section 5 of the Plan contains the Plan's vision and aims. The vision is as follows:

*"Vision*

*To promote and protect the unique assets Sandy has to offer its community and develop the town further as an attractive, sustainable, prosperous place with opportunities for everyone to live and thrive."*

4.15 The Plan's aims are as follows:

Community

1. Provide places and public spaces that people will enjoy for recreation and culture.
2. Retain existing cultural assets, community facilities and retail facilities.
3. Support the development and redevelopment of Sandye Place in line with the Masterplan.

Natural & Historic Environment

4. Protect and enhance green spaces and the countryside to improve biodiversity and the natural environment.
5. Protect and preserve our historic buildings and structures.

Local Business & Agriculture

6. Attract new businesses to the town and enable existing businesses including agricultural businesses to grow and prosper.

Transport & Rights of Way

7. Improve public transport, road and rail links to help people to get where they need to go, safely and sustainably.
8. Develop better connectivity within the town and surrounding areas for walking and cycling.

Sustainable Development

9. High quality development will be secured reflecting the character of the surroundings and promoting the local distinctiveness of Sandy.
10. Require new homes, employment and leisure facilities to be sustainably designed and constructed and be energy and water efficient.

4.16 Section 6 of the Plan, entitled 'Sustainable Development', sets out the following principles for sustainable development in Sandy:

*"Sustainable development for Sandy means that development should be:*

- Of a high standard of design, reflecting the character of the Surroundings,*
- Contributing towards community infrastructure,*
- Providing superfast broadband connections,*
- Ensuring that there is no increase in the risk of flooding,*
- Meeting contemporary construction, energy efficiency and water management standards,*
- Located and designed to enable safe walking and cycling to local services and facilities."*

It also states that:

*"The following adverse impacts must be avoided:*

- The loss of the best and most versatile agricultural land,*
- The loss or inappropriate diversion of public rights of way,*
- Avoidable intrusion into open countryside,*
- The loss of or damage to wildlife habitats and hedgerows and trees,*
- A loss of amenity for existing residential properties and reduced efficiency for nearby businesses,*
- Overloading existing utilities and services (water, drainage, sewage and waste)."*

4.17 I consider that overall, subject to the detailed modifications which I recommend to specific policies below, that individually and collectively the Plan's policies will contribute to the achievement of sustainable patterns of development. There are a number of detailed matters which require amendment to ensure that the policies have the necessary regard to national policy and the strategic policies of the Council. Accordingly, I recommend modifications in this report in order to address those matters.

### Specific Issues of Compliance

4.18 I turn now to consider the proposed Policies in the draft Plan, and I take into account, where appropriate, the representations that have been made concerning those policies, together with the responses by the Qualifying Body and the Council to my questions (see paragraphs 2.8 and 2.9 above). Sections 7-12 of the Plan sets out the proposed policies for the Plan area under the headings of Community; Natural Environment; Historic Environment; Local Businesses & Agriculture; Transport and Rights of Way; and, Sustainable Development.

## Community

- 4.19 Section 7 of the draft Plan addresses the theme of Community within the Plan area and contains three policies (Policies C1-C3) to meet the Plan's objectives to provide places and public spaces that people will enjoy for recreation and culture, to retain existing cultural assets, community facilities and retail facilities and to support the development and redevelopment of Sandye Place in line with the Masterplan.
- 4.20 Policy C1 (Town Centre) states that within the Town Centre Boundary, as defined on the Policies Map, new Class E uses at ground floor will be supported. It further states that within the Town Centre Boundary, the loss of Class E premises will be resisted, unless it can be demonstrated that reasonable efforts have been made to secure their continued use for these purposes. If it can be clearly demonstrated that the continued use is no longer viable and evidence is provided that the property has been actively marketed, commensurate with its use at an open market value for a period of at least 6 months, other uses may be supported provided that:
- the proposed use would be of an appropriate scale within the town centre; and
  - the proposed use would positively support the vitality of the town centre by enhancing the range of facilities offered and/or stimulating activity outside normal shopping hours.

The policy goes on to state that for the improvement of pedestrian and cycle movement within the town centre will be supported. The loss of public car parking spaces within the Town Centre Boundary will be resisted unless there are clear benefits to the community and the vitality of the town centre. Finally, it states that historic shopfronts should be retained and new shopfronts, advertisements and signage should be of a high quality and reflect the provisions set out in the Sandy Design Codes.

- 4.21 In my assessment, the policy is appropriately drafted and provides clear guidance for proposals, including Active Travel improvements, within the town centre.
- 4.22 Policy C2 (Sandye Place) states that proposals for redevelopment of the Sandye Place site will only be supported where they have regard to the design vision, concept and principles contained in the supporting Sandye Place Masterplan document (dated June 2023) and the Sandy Design Guidance and Codes. It further states that any proposals for community use will be strongly supported.
- 4.23 The Sandye Place site is 6.9 hectares in size (rather than approximately 7.5 hectares as stated in the draft Plan at paragraph 7.16) and lies just to the south of the town centre. The site is within the Conservation Area and is occupied by an early 18<sup>th</sup> century manor house and dovecote, which is a Grade II listed building, a number of more recent educational buildings and a World War 2 hangar, which is a non-designated heritage asset. The

site also includes extensive areas of open grassland, a number of trees which are protected by a Tree Preservation Order (TPO). The site is relatively flat but the Sandye Place house sits on elevated land. Parts of the site are subject to localised surface water flooding. To the south of the site, the Sandy Green Wheel walking and cycling route passes along the banks of the River Ivel, whilst to the west of the site is the Riddy Local Nature Reserve. The site is owned by Central Bedfordshire Council and was formerly occupied by the Sandye Place Academy which closed in 2019. The site is presently listed as an Asset of Community Value, and this listing will expire in December 2028 unless it is confirmed for a further extended period.

- 4.24 The submission draft Plan is accompanied by a supporting document, prepared by AECOM in June 2023 (see paragraph 2.7 above) setting out Masterplan options to inform the future regeneration and utilisation of the site.
- 4.25 In its capacity as landowner, the Council has raised significant representations to this policy and also to Policy NE3 (Local Green Spaces). These representations are supported by a report (with seven Appendices) prepared on behalf of the Council by Phase 2 Planning & Development Ltd. I have given careful consideration to these representations.
- 4.26 In summary, the Council cites a lack of engagement during the preparation of the Plan, specifically regarding the Council's position as landowner of Sandye Place. The Council objects to Policy C2 as it is based on a high-level Masterplan which is unsupported by proportionate evidence, and which is overly restrictive supporting only community uses and excluding residential or mixed-use development contrary to national and Local Plan policies. Finally, the Council considers that the policy, as presently drafted, renders the prospect of the site being undeliverable and preventing its contribution to achieving sustainable development including an addition to housing supply. I address the Council's objections to Policy NE3 at paragraphs 4.43-4.46 below.
- 4.27 Upon my initial assessment of the draft Plan, its supporting documents and the representations submitted at the Regulation 16 consultation stage, I raised Question No. 4 and invited the Qualifying Body to consider the Council's Regulation 16 submission (including its Appendices) and provide me with a Note on any further points that it may wish to make regarding the objections that had been raised, ahead of my detailed assessment. I also confirmed that I would visit the former Sandye Place Academy site during the course of my site visit.
- 4.28 In its response document, the Town Council stated that Sandye Place has been treasured by Sandy residents for decades, and has hosted the annual Sandy Carnival, Sandy Show, various open air music events and was a much-loved school. Consequently, and bearing in mind it is an 'Asset of Community Value', the Town Council had a duty to undertake extensive consultation over its future prior to, and during the production

of the Neighbourhood Plan. It goes on to state that the Town Council have worked hard to ensure that the importance of the site to the residents of the town is fully acknowledged through the Neighbourhood Plan and this was best represented by commissioning a Masterplan which involved input from local people. In the Town Council's view, these consultations have given the Town Council a strong mandate to support the Sandye Place Masterplan. The Town Council does not accept that Central Bedfordshire Council as landowner was not involved/notified in the production of the Neighbourhood Plan, specifically in relation to this site and reject the assertions that this is the case. There have been ongoing discussions with the Council's Assets Team and Ward Councillors since the site closed and since a public consultation run by the Council in 2021. Discussions have had a broader context than just the Neighbourhood Plan, most recently concerning a potential asset transfer to the Town Council. The Town Council state that the Council had sight of the Masterplan document prior to the Regulation 14 consultation.

- 4.29 The Town Council also state that the precise wording of Policy C2 does not limit or prevent development on the site, it states that '*proposals for redevelopment will only be supported where they have regard to the design vision, concept and principles in the Master Plan and the Sandy Design Guidance and Codes document.*' Finally, the Town Council consider that the Masterplan is a high-level document and not intended as a development proposal in its own right, hence there was no need for the Town Council to commission technical and viability studies as if the policy was a site allocation policy.
- 4.30 I have given careful and detailed consideration to the differing views being expressed by the Council and the Town Council regarding this policy. I have also been informed by my site visit when I considered the site itself and its situation within its wider setting. It is my assessment that the future development and use of the site will require the most sensitive planning, as the site is within the Conservation Area and makes a valuable contribution not only to the Conservation Area but also to the wider area on the southern side of Sandy Town Centre. It is by no means a straightforward example of being able to plan for the future use of the site in the absence of detailed technical studies regarding the many environmental and technical considerations that will need to be addressed in order to establish the most appropriate form of development.
- 4.31 In that context, I do consider that the Sandye Place Masterplan will make an important contribution to the assessment of the future development potential of the site. As it concludes correctly, at paragraph 7.1, it "*will be a valuable tool for securing context-driven, high-quality development*". The Town Council should not be criticised for commissioning the report, and I am confident that it will have an important input to the future planning and use of the site, in whatever form that takes. However, I do consider that the policy, as drafted, does not provide sufficient flexibility for the consideration of a wider range of development opportunities than it presently sets out. Such opportunities may well include a number of

potential community uses, but they will also certainly include opportunities for high-quality, well designed residential and mixed-use developments in various parts of the site. In fact, such developments would, if sensitively located and designed, enhance the overall contribution that the site does make to this part of Sandy.

- 4.32 Therefore, in light of my assessment and conclusions, I recommend a modification to the policy text, which I consider will address the objectives of both the Town Council and the Council, in its capacity both as the landowner and as local planning authority, and ensure that the Plan and this policy contributes to the achievement of sustainable development. This recommended modification is set out at **PM1**.
- 4.33 Policy C3 (Community facilities) states that community facilities will be retained and planning applications, which result in either the loss of or significant harm, will be resisted unless an alternative is provided of equivalent or better quality within reasonable proximity. It then lists nine community facilities which will be retained, and further states that the provision of new community facilities will be encouraged. It goes on to state that proposals to improve the viability of a community facility by way of the extension or partial replacement or redevelopment of buildings, structures and land, will be supported, provided the design of the scheme respects the Parish character in general, and the resulting increase in use is appropriate in design terms and will not have negative impact on the amenities of adjoining residential properties. Finally, it states that the provision of allotments will be encouraged and supported, and that on new major housing sites, allotments and associated infrastructure should be provided.
- 4.34 Although the policy could perhaps be drafted more succinctly, it provides sufficient clarity and does not breach the Basic Conditions. Therefore, I am satisfied that it provides clear guidance for future users of the Plan.
- 4.35 With recommended modification PM1, I consider that the draft Plan's section on Community and its accompanying policies (Policies C1-C3) is in general conformity with the strategic policies of the adopted CBLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

## Natural Environment

- 4.36 Section 8 of the draft Plan addresses the theme of the Natural Environment within the Plan area and contains three policies (Policies NE1-NE3) to address the various topics within this theme.
- 4.37 Policy NE1 (Protecting the Landscape) states that any proposals for development should recognise and seek to protect and enhance the historic and natural landscape and local character of the Parish, including field ponds, mature trees, hedgerows and wildlife corridors, such as the Green Spine. It goes on to state that such features should be protected

and, where appropriate, incorporated into any landscape design schemes and their long-term maintenance ensured. Finally, it states that proposals for new development should include an appropriate landscape impact analysis identifying possible impacts on the site, its surroundings and Greensand County and propose mitigation if needed.

- 4.38 A focused amendment is necessary to the policy text to address a comment made by the Council and, subject to this amendment, I am satisfied that this policy is suitably drafted. Recommended modification **PM2** sets out the necessary amendment.
- 4.39 Policy NE2 (Biodiversity) states that new development will be required to protect and enhance existing natural features of sites, and provide at least 10% net gain in biodiversity and preferably significantly in excess of this to reflect the importance of the Greensand Ridge Nature Improvement Area. It further states that, in new buildings, provision of appropriate species-related measures will be required, including, for example, swift bricks, bat and owl boxes and the incorporation of native species into landscaping schemes. Finally, it states that opportunities should also be taken by developers and landowners to link sustainable drainage solutions in new development to complement nature conservation objectives.
- 4.40 I note that the Council have no concerns regarding this policy. I also consider that it provides appropriate guidance for users of the Plan regarding the protection and enhancement of biodiversity in the Plan area. Accordingly, I do not recommend any modifications to this policy.
- 4.41 Policy NE3 (Local Green Spaces) states that the following 10 sites are designated as Local Green Spaces:
- Bedford Road Recreation Ground
  - Fallowfield Recreation Ground
  - The Pinnacle
  - Sunderland Road Recreation Ground
  - Sandcast Meadows
  - Sandcast Wood
  - Sandy Disused Railway County Wildlife Site
  - Sandye Place Grounds
  - The Riddy Local Nature Reserve
  - Winchester Road Open Space

The policy also states that proposed development within the Local Green Spaces will be treated consistently with those for the Green Belt and development should not be approved except in very special circumstances. Inappropriate development will be resisted to protect their special character and contribution to the Parish.

- 4.42 I visited each of the proposed Local Green Spaces during the course of my site visit. I have also considered the representations that have been made concerning the policy and specific sites. As part of my initial assessment of the draft Plan, I noted that whilst Figure 19 at Appendix B

identifies the location of the proposed ten Local Green Spaces, it is not sufficient to identify with clarity the boundaries of each of the proposed Local Green Spaces, in relation to their immediate surrounding areas and adjoining properties. I therefore raised Question No. 1 on this matter, and requested that Qualifying Body provide a set of Inset Maps at a suitable scale that I may consider as a potential modification to the draft Plan. As part of its response to the preliminary questions, the Town Council has provided (at Appendix A to its response document) a set of Inset Maps which I consider to be suitably scaled and which provide clear definition of the sites and their boundaries.

- 4.43 Central Bedfordshire Council has raised objections to the designation of Sandye Place Grounds as a Local Green Space. In summary, those objections state that the proposed designation does not meet the tests set out in the NPPF, in that the land is extensive, not demonstrably special and not publicly accessible. The Council also state that the site is already protected by existing policy designations, and that adding the status of a Local Green Space is duplicative, unjustified and unnecessarily restrictive.
- 4.44 In its response to these points, the Town Council state that it would be difficult to see how the proposed LGS site would be a suitable site for development given the constraints and adverse impact of development on that part of the site, when there are other more suitable sites to be allocated for potential development. The Town Council's response goes on to state that the site is not an extensive tract of land and that the site fulfils all the NPPF criteria, as contained in the supporting 'Proposed Local Green Space Designations for Sandy' report, prepared by the Bedfordshire Rural Communities Charity in March 2024. The response further notes that whilst the entire Sandye Place site is within the Conservation Area and the undeveloped spaces are shown as 'important green space' in the Conservation Area Assessment, these designations are about the character and important historic interest of the site.
- 4.45 I fully understand and recognise the Town Council's desire to safeguard part of the Sandye Place site as a designated Local Green Space. However, in the context of the Council as the site's owner raising strong objections to its proposed designation as a Local Green Space, it is my assessment that there should be a compelling and over-riding justification at this time for that designation. I consider that this threshold has not been reached. I have noted above (with regard to Policy C2) that the future uses and potential development opportunities at this important site have yet to be finalised with sufficient certainty. I am satisfied that the supporting Sandye Place Masterplan (June 2023) and the Sandy Design Guidance and Codes (October 2023) prepared as supporting documents to this Plan will provide suitable guidance for the consideration of such opportunities. Furthermore, I am concerned at the proportionality of the proposed Local Green Space designation in the context of the site as a whole, which could serve to inhibit the most appropriate form of high-quality development that will be necessary at this site. My conclusion is that the Sandye Place Grounds site should not be designated as a Local

Green Space in this Plan. However, in due course and potentially as part of a future review of the Plan, it should be very much clearer whether the designation of the site, as presently proposed or covering a differing area of land, can be justified with the full support of the landowner and with the prospect of greater public access and enjoyment. I recognise that my conclusion will be a disappointment to the Town Council, but it is the case that there is not yet sufficient certainty at this point in time regarding the future of the whole site to be able to add this further policy designation to a significant part of the site.

- 4.46 I am satisfied that the other nine proposed Local Green Spaces, as listed above, do meet the national policy criteria for their designation as Local Green Spaces in the NPPF (paragraph 107) and are capable of enduring beyond the end of the Plan period (paragraph 106). However, I consider that an amendment is necessary to the policy text to have the necessary regard to national policy and that Figure 19 at Appendix B to the Plan be supplemented by the addition of the relevant Inset Maps (with the exception of Sandye Place Grounds) prepared by the Town Council in response to Question No. 1. These matters are addressed by recommended modification **PM3**.
- 4.47 With recommended modifications PM2 and PM3, I consider that the draft Plan's section on the Natural Environment and its accompanying policies (Policies NE1-NE3) is in general conformity with the strategic policies of the adopted CBLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

### Historic Environment

- 4.48 Section 9 of the draft Plan addresses the theme of the Historic Environment in the Plan area and contains two policies (Policies HE1 and HE2) concerning the local heritage assets and the archaeology in the area.
- 4.49 Policy HE1 (Protecting and enhancing local heritage assets) states that all development proposals affecting identified local heritage assets set out at Appendix D to the Plan will be required to take into account the character, context and setting of the assets. Development should be designed taking account of local styles, materials and detail. The policy goes on to state that the effect of an application on the significance of an identified local heritage asset should be taken into account in determining the application. Finally, it states that in weighing applications that directly or indirectly affect a local heritage asset, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset concerned.
- 4.50 Appendix D lists 32 NDHAs within the Plan area. From my initial assessment of the draft Plan, I viewed the information contained at Table 4 within Appendix D as being largely insufficient for me to be able to assess whether the 32 buildings and structures listed therein are worthy

for protection as NDHAs in accordance with Policy HE1. I noted that there is very little detail on any distinctive features of architectural and artistic interest, particularly reflecting the local area, and site Nos. 28-32 appeared to contain no assessments against the criteria contained in Historic England Advice Note 7. I was also not able to identify a supporting study or assessment providing more detailed information. I therefore raised Question No. 3 regarding this matter, requesting that the Qualifying Body provide me with a full Note that sets out further information, if possible, with accompanying photographs, regarding each of the 32 buildings and structures, that I may then consider as part of the examination. I also confirmed that I would view each of the buildings and structures during the course of my site visit.

- 4.51 The Town Council responded to Question No. 3 stating that no additional report was produced at the time of the production of this part of the Plan. However, there was a long list of sites produced and visited, recorded and discussed in detail by members of the Steering Group prior to a short list being produced and then landowners being notified. Historic England Advice Note 7 was used for the assessments. The Town Council also provided an additional document to show the information requested, and this is attached as Appendix B to the Town Council's response document. I have given careful consideration to this additional document and am satisfied that it provides sufficient justification for each of the 32 proposed NDHAs that are identified in the Plan. I also viewed the proposed NDHAs during the course of my site visit. Accordingly, I recommend that Table 4 at Appendix D in the draft Plan be extended to include the additional information and photographs for each of the buildings and structures. I do not consider it necessary for the draft Plan to include the list of buildings and structures that are not included in Table 4, and these should be deleted. I am also satisfied that the policy text is suitably drafted. Recommended modification **PM4** addresses the necessary changes to Appendix D.
- 4.52 Policy HE2 (Protecting & Enhancing Understanding of Archaeology) states that all development proposals that affect archaeological remains or are within areas that have the potential to include archaeological remains, in particular Roman Sandy, should demonstrate that they have considered the impact on archaeology. It then states that developers will be required to implement mitigation strategies to ensure that evidence of the past is not lost, and, where significant remains are identified, preservation in situ may be required. Development proposals which affect Scheduled Ancient Monuments whether directly or by development within their setting will need to demonstrate that they will not cause significant harm to the monument unless the harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss. Finally, it states that the effect of an application on a non-designated archaeological site should be taken into account with a balanced judgement with regard to the scale of any harm or loss and the significance of the site concerned.

- 4.53 I am also satisfied that the policy text is suitably drafted, and will provide clear and comprehensive guidance for users of the Plan.
- 4.54 With recommended modification PM4, I consider that the draft Plan's section on the Historic Environment and its accompanying policies (Policies HE1 and HE2) is in general conformity with the strategic policies of the adopted CBLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

### Local Businesses and Agriculture

- 4.55 Section 10 of the draft Plan addresses the theme of Local Businesses & Agriculture within the Plan area and contains one policy (Policy LB1) to address this theme.
- 4.56 Policy LB1 (Supporting Local Business and Agriculture) states that proposals for new employment generating uses on existing employment sites and within the Settlement Envelope will be encouraged in line with Local Plan policies. It goes on to state that proposals for the development of new small businesses and for the expansion or diversification of existing businesses, including the visitor economy and farm-based businesses, will be supported providing that there will be no adverse impact arising from increased traffic, lighting, noise and other emissions, there would be an acceptable impact on the character and scale of the rural landscape opportunities are taken to secure the re-use of vacant or redundant historic buildings and that adequate provision is made for car and bicycle parking. Finally, it states that applications for extensions or part change of use of residential dwellings to enable flexible or home working will be supported subject to there being appropriate parking provision and that the residential amenity of neighbouring properties is maintained.
- 4.57 Upon my initial assessment of the draft Plan, I noted that the policy states that proposals for new employment generating uses on existing sites and within the Settlement Envelope, will be encouraged in line with Local Plan policies. As Question no. 2, I therefore requested that the Qualifying Body confirm that the Settlement Envelope described in this policy relates to the Settlement Envelope defined by Policy SP7 in the adopted Central Bedfordshire Local Plan (July 2021), as shown on Inset Map 49 to the Local Plan Policies Map. I also noted that the Local Plan allocates three sites for future employment development at Sandy. There is a brief mention of two of these sites at paragraph 10.3. It was my assessment that the draft Plan should include rather more specific references to Local Plan Policies SP7 and EMP1 as they affect Sandy, possibly as an extended paragraph 2.7, and I therefore, also invited the Qualifying Body to consider this matter, and provide me with a Note that includes draft text for revisions to paragraph 2.7 in the Plan, and/or at any other points in the Plan that may be appropriate, that I may consider as a potential modification to the draft Plan.

- 4.58 In its response to Question No. 2, the Town Council has proposed a number of revisions to paragraphs 2.7 and 10.3 in the draft Plan. I am satisfied that these revisions do address the points that I raised. The Council has also made a comment regarding the policy text. I concur with the Council and propose a focused amendment to the policy text to address that matter. The necessary amendments to the policy text and to paragraphs 2.7 and 10.3 in the draft Plan are all addressed by recommended modification **PM5**.
- 4.59 With recommended modification PM5, I consider that the draft Plan's section on Local Businesses & Agriculture and its accompanying policy (Policy LB1) is in general conformity with the strategic policies of the adopted CBLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

### Transport and Rights of Way

- 4.60 Section 11 of the draft Plan addresses the theme of Transport and Rights of Way within the Plan area and contains two policies (Policies T1 and T2) to address this theme.
- 4.61 Policy T1 (Car Parking) states that development proposals will provide parking and electric charging points in line with the Council's parking standards. New commercial and residential developments will provide on-site parking unless alternative and accessible car parking arrangements can be made which do not add to on-street congestion. It goes on to state that new developments should not result in the loss of publicly accessible off-street car parking. Developments which propose to remove off-road parking spaces will only be supported where alternative provision is made within the vicinity of the site, the benefits of the proposals for the community outweigh the inconvenience to car drivers and the development would lead to a proportionate change in the requirement for publicly accessible parking and the existing public parking is no longer required. Proposals for new development that provide additional off-road car parking to alleviate parking congestion will be encouraged.
- 4.62 The Council has requested an amendment to the policy text. I also consider that potential "*inconvenience for drivers*" should not form part of the policy text, and recommend an amendment accordingly. These matters are addressed by recommended modification **PM6**.
- 4.63 The Council has also raised a number of comments to the supporting text in Section 11. A number of these comments are minor non-material matters that can be addressed as part of the general minor amendments to the draft Plan (see paragraph 4.80 below), but the more significant and necessary amendments in order to meet the Basic Conditions are addressed by recommended modification **PM7**.

- 4.64 Policy T2 (Provision for Pedestrians, Cyclists and Horseriders) states that new development should include measures that keep traffic speeds low and improve the provision of pavements and access for pedestrians, cyclists, mobility scooters and horseriders. Relevant highway works should be designed to complement the character of the location and reflect local heritage. It goes on to state that the network of footpaths, cycleways and bridleways that are listed as Rights of Way will be retained and new links within the town, to neighbouring villages, to the proposed Tempsford Interchange Station and to the wider countryside will be encouraged. Finally, it states that provision of a Green Spine through the town and further improvements and links to the Green Wheel will be supported.
- 4.65 Subject to a typographical correction<sup>11</sup>, which is addressed by recommended modification **PM8**, I am satisfied that this policy is suitably drafted and provides clear guidance for users of the Plan.
- 4.66 With recommended modifications PM7 and PM8, I consider that the draft Plan's section on Transport and Rights of Way and its accompanying two policies (Policies T1 and T2) is in general conformity with the strategic policies of the adopted CBLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

### Sustainable Development

- 4.67 Section 12 of the draft Plan addresses the theme of Sustainable Development within the Plan area and contains two policies (Policies SD1 and SD2) to address this theme.
- 4.68 Policy SD1 (High Quality Design) states that proposals for high quality new development (including new buildings and extensions to existing buildings) will be supported, where they are in accordance with the guidelines and design principles set out in the Sandy Design Guidance and Codes. It then sets out a series of place-making and design criteria that all new development must meet, including matters relating to green infrastructure, pedestrian and cyclist connections, car parking, landscaping, signage and waymarking, density and materials
- 4.69 The Council has not made any comments regarding this policy, and I also consider that it is suitably drafted and provides clear guidance on the matters that will need to be addressed in order to secure high quality design in new developments within the Plan area.
- 4.70 However, the Council has made extensive comments to the content of the 'Sandy Design Guidance and Codes' document, which is referenced in this policy and which is an important supporting document to the Plan. I

---

<sup>11</sup> Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

raised this matter as Question No. 5 and requested that the Qualifying Body take full account of the comments that had been raised by the Council and provide me with the text of a draft Addendum that could be added to the Design Guidance and Codes report, with a suitable cross-reference within the draft Plan. I acknowledged that this may require the confirmation and agreement of AECOM, as the authors of the report, that this would be an appropriate way of addressing the Council's points.

- 4.71 The Town Council has provided the draft text of an Addendum to address the Council's comments, and I understand that the document's authors, AECOM have agreed that an Addendum can be produced. I consider that the Town Council should collaborate with the Council to ensure that the proposed Addendum is accurate and up to date in all respects (as the document dates from October 2023). I also consider that suitable reference should be made within the Plan, at paragraph 12.4, to refer to the fact that the Design Guidance and Codes documents has an accompanying Addendum. This is addressed by recommended modification **PM9**.
- 4.72 Policy SD2 (Provision of Energy and Water Efficient Buildings) states that the design and standard of any new building should aim to meet a high level of sustainable design and construction and be optimised for energy efficiency. It further states that the retrofit of existing buildings including heritage buildings is encouraged to reduce energy demand and to generate renewable energy where appropriate, providing it safeguards historic characteristics. It then sets out a range of energy efficiency measures that can be included, subject to feasibility and viability. It goes on to state that all developments must be designed to take into account best practice in water efficiency, such as water efficient appliances, water harvesting and storage features. Finally, it states that relevant information should be submitted, where required in relation to the scale and type of development being proposed, in an Energy Statement and/or in a Design and Access Statement accompanying planning applications.
- 4.73 The Council has not raised any concerns regarding this policy, which addresses comments that had been made by the Council at an earlier stage. I am satisfied that the policy is suitably drafted.
- 4.74 With recommended modification PM9, I consider that the draft Plan's section on Sustainable Development and its accompanying policies (Policies SD1 and SD2) is in general conformity with the strategic policies of the adopted CBLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

### Aspirations, Implementation and Monitoring

- 4.75 Section 13 of the draft Plan addresses the various aspirations that the Town Council intends to take forward in Sandy. They include a range of environmental improvements, extensions and improvements to the

established Green Wheel, the development of a Green Spine through the town centre and community energy initiatives. It includes further sections on implementation and working in partnership with key stakeholders including Central Bedfordshire Council, adjoining Parish Councils, the Environment Agency and site owners and developers. It sets out the potential funding and implementation mechanisms, which include Section 106 agreements and the Community Infrastructure Levy (CIL), if it is introduced by the Council.

- 4.76 It also sets out the Town Council's commitments to the monitoring and review of the Plan. It states that the Town Council will report on the implementation of the Plan every five years, and that it may be necessary to formally review the Plan prior to 2035, for example following the emerging review of the CBLP or changes in national policy. I am satisfied that this section of the Plan addresses the potential need to formally review the Plan at a future date. The Council has requested a focused amendment to paragraph 13.14, and this is addressed by recommended modification **PM10**.

## Appendices

- 4.77 The draft Plan contains six Appendices, as follows:

- A. Bibliography
- B. Policies Maps
- C. Sandye Place Masterplan
- D. Local Heritage Assets
- E. Table of Aims and Policies
- F. Glossary

I have reviewed each of the Appendices, which are referenced within the foregoing assessment of the Plan's policies, where necessary.

- 4.78 Appendices B, C and D are the subject of recommended modifications linked to the policies in the Plan and these are set out in the accompanying Appendix to this report.

## Other Matters

- 4.79 The Council has made a number of comments, suggestions and corrections regarding various parts of the draft Plan within its representations. These are set out in the comments provided by the Highways, Public Health, Planning Policy and Strategic Transport teams of the Council. I have taken account of those comments that relate to the Plan's policies, but the Qualifying Body's attention is drawn to the need to make any necessary minor, non-material amendments, for example to amplify or correct matters in the supporting text. Reference should be made to the representations submitted by the Council for more detailed information on these matters.

## Concluding Remarks

4.80 I consider that, with the recommended modifications to the Plan as summarised above and set out in full in the accompanying Appendix, the Sandy Neighbourhood Plan 2021-2035 meets the Basic Conditions for neighbourhood plans. Other changes (that do not affect the Basic Conditions) could be made prior to the referendum at the Council's discretion. These could include minor non-material amendments, consequential amendments resulting from the policy modifications, typographical corrections and factual up-dates.<sup>12</sup>

## 5. Conclusions

### Summary

- 5.1 The Sandy Neighbourhood Plan 2021-2035 has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard to all the responses made following consultation on the Plan, and the supporting documents submitted with the Plan, together with the responses to my questions.
- 5.2 I have made recommendations to modify certain policies and other matters to ensure that the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

### The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Sandy Neighbourhood Plan 2021-2035, as modified, has no policies or proposals which I consider significant enough to have an impact beyond the designated neighbourhood area boundary, requiring the referendum to extend to areas beyond the Plan boundary. I therefore recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated neighbourhood area.

### Overview

- 5.4 It is clear that the Sandy Neighbourhood Plan is the product of much hard work undertaken since 2020 by the Town Council, its Neighbourhood Plan Steering Group and the many individuals and stakeholders who have contributed to the preparation and development of the Plan. In my assessment, the Plan reflects the land use aspirations and objectives of the Sandy community for the future planning of their area up to 2035.

---

<sup>12</sup> PPG Reference ID:41-106-20190509.

The output is a Plan which should help guide the area's development over that period, making a positive contribution to informing decision-making on planning applications by Central Bedfordshire Council.

*Derek Stebbing*

Examiner

## Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Page 39	<p><u>Policy C2 – Sandye Place</u></p> <p>Delete existing policy text in full and replace with:</p> <p><b>“Proposals for the future development and use of the Sandye Place site will need to address the site’s location within the Sandy Conservation Area and take account of the Sandye Place Masterplan (June 2023) and the Sandy Design Guidance and Codes (October 2023) prepared as supporting documents to this Plan.</b></p> <p><b>Future uses of the site may include high-quality residential and mixed-use developments together with appropriate community uses. Other uses may also be appropriate as part of the wider potential of the site.</b></p> <p><b>All proposed developments and uses will need to be considered as part of a Masterplan-led approach with accompanying technical studies to ensure that the impact of the proposals upon the Conservation Area and its setting are fully addressed.”</b></p>
PM2	Page 47	<p><u>Policy NE1 – Protecting the Landscape</u></p> <p>Replace the words “landscape impact analysis” in the third paragraph of policy text with <b>“Landscape and Visual Impact Assessment”</b>.</p>
PM3	Pages 51 and 84	<p><u>Policy NE3 – Local Green Spaces</u></p> <p>Delete ‘Sandye Place Grounds’ (Site No. 9 on Figure 9) from the list of Local Green Spaces in the policy text and from Figure 19 at</p>

		<p>Appendix B.</p> <p>Delete second paragraph of policy text and replace with:</p> <p><b>“Development proposals within the designated Local Green Spaces will be consistent with national policy for Green Belt.”</b></p> <p>Add Inset Maps Nos. 1-8/10 provided at Appendix A to the Town Council’s response document to follow Figure 19 in Appendix B in the draft Plan.</p>
PM4	Pages 88-98	<p><u>Appendix D - Local Heritage Assets</u></p> <p>Extend Table 4 by including the additional information and photographs for each of the 32 NDHAs that are contained at Appendix B to the Town Council’s response document dated 16 January 2026.</p> <p>Delete the list of buildings and structures that were not accepted as proposed NDHAs, that is set out at Pages 97 and 98 in the draft Plan.</p>
PM5	Pages 6, 57 and 59	<p><u>Policy LB1 – Supporting Local Business and Agriculture</u></p> <p>Paragraph 2.7 – delete existing text and replace with:</p> <p><b>“The Local Plan seeks to deliver sustainable growth and in Service Centres such as Sandy some development may be appropriate. A Settlement Envelope is defined for the town under Policy SP7 which allows for infill development, redevelopment and windfall development proportionate to the scale of the settlement, taking account of its role and function in the settlement hierarchy and subject to certain criteria. No housing allocations are made in the Parish, however, Policy EMP1 of the Local Plan allocates three</b></p>

		<p><b>sites for employment development at Land North of Beamish Close, Land north of Sunderland Road and Land West of Girtford Bridge.”</b></p> <p>Paragraph 10.3 – delete existing text and replace with:</p> <p><b>“Policy EMP1 of the Local Plan allocates three sites for employment development at land north of Sunderland Road, land West of Girtford Bridge and land North of Beamish Close. The Beamish Road site, together with existing employment sites, will only be considered suitable for non-employment uses where, after a 12-month marketing period, they are demonstrated to be no longer viable for this purpose. The requirements for this are set out in the Local Plan Policy EMP2. In a future review of the Local Plan, the Town Council would wish to see the site at Sunderland Road, in particular, assessed to see if the whole site is suitable to remain in employment use, or whether it would in part be more suitable for housing or other uses, given the proximity to the Town Centre.”</b></p> <p>Delete the second bullet point criterion within the second paragraph of policy text and replace with:</p> <ul style="list-style-type: none"> <li>• <b>“it would not lead to any unacceptable impacts upon the character and scale of the rural landscape in the area; and”.</b></li> </ul>
PM6	Page 66	<p><u>Policy T1 – Car Parking</u></p> <p>Amend the first sentence of policy text to read as follows:</p> <p><b>“Development proposals will provide parking and electric charging points in accordance with Central Bedfordshire Council’s ‘Parking Standards for New Developments’ (2023) and ‘Electric</b></p>

		<b>Vehicle Charging: Guidance for New Development' (2022) Supplementary Planning Documents (SPDs)</b>
PM7	Pages 61-65	<p><u>Section 11 – Supporting Text</u></p> <p>Paragraph 11.5 – insert the words <b>“to an unacceptable level”</b> after the word “volume” in the 10<sup>th</sup> line of text.</p> <p>Paragraph 11.15 – “off-road” should be <b>“off-street”</b>.</p> <p>Paragraph 11.19 – add the following text to the second sentence:</p> <p><b>“and this is covered by Central Bedfordshire Council’s Design Guide and Highway Construction Standards and Specifications Guidance.”</b></p> <p>Paragraph 11.20 – delete the words “and the future Local transport Plan will set out these requirements” in the 5<sup>th</sup> line of text.</p>
PM8	Page 69	<p><u>Policy T2 – Provision for Pedestrians, Cyclists and Horseriders</u></p> <p>Amend the words “rights-of-way” to read <b>“Rights of Way”</b> in the second paragraph of policy text.</p>
PM9	Page 71	<p><u>Section 12 – Sustainable Development</u></p> <p>Paragraph 12.4 – amend the first sentence of text to read as follows:</p> <p><b>“The Design Guidance and Codes document, with accompanying Addendum, sets out 13 different character areas.”</b></p> <p>The Town Council should also note that there are two typographical errors in paragraphs 12.3 and 12.5, viz:</p> <p>12.3 “Aecom” should be “AECOM”.</p> <p>12.5 “Design Guidance and Code” should be “Design Guidance and Codes”</p>

PM10	Page 80	<u>Aspirations, Implementation and Monitoring</u> Paragraph 13.14 - delete the words "through the Local Transport Plan."
------	---------	---

<b>Sandy Neighbourhood Plan</b>	
<b>Submitted Version wording Reg 16</b>	<b>Modifications from Examiner</b>
<p><b>Policy C2 – Sandye Place</b> Proposals for redevelopment of the Sandye Place site will only be supported where they have regard to the design vision, concept and principles contained in the supporting Sandye Place Masterplan Document (dated June 2023) and the Sandye Design Guidance and Codes.</p> <p>Any proposals for community use will be strongly supported</p>	<p><u>Policy C2 – Sandye Place</u> Delete existing policy text in full and replace with: <b>“Proposals for the future development and use of the Sandye Place site will need to address the site’s location within the Sandy Conservation Area and take account of the Sandye Place Masterplan (June 2023) and the Sandy Design Guidance and Codes (October 2023) prepared as supporting documents to this Plan. Future uses of the site may include high-quality residential and mixed-use developments together with appropriate community uses. Other uses may also be appropriate as part of the wider potential of the site. All proposed developments and uses will need to be considered as part of a Masterplan-led approach with accompanying technical studies to ensure that the impact of the proposals upon the Conservation Area and its setting are fully addressed.”</b></p>
<p><b>Policy NE1 – Protecting the Landscapes</b> Any proposals for development should recognise and seek to protect and enhance the historic and natural landscape and local character of the Parish, including field ponds, mature trees, hedgerows and wildlife corridors, such as the Green Spine.</p> <p>Such features should be protected and where appropriate, incorporated into any landscape design schemes and their long-term maintenance ensured.</p> <p>Proposals for new development should include an appropriate landscape impact analysis identifying possible impacts on the site, its surroundings and Greensand Country and propose mitigation if needed</p>	<p><u>Policy NE1 – Protecting the Landscape</u> Replace the words “landscape impact analysis” in the third paragraph of policy text with <b>“Landscape and Visual Impact Assessment”</b>.</p>

<p><b>Policy NE3 – Local Green Spaces</b>  New development will be required to protect and enhance existing natural features of sites and provide at least 10% net gain in biodiversity and preferably significantly in excess of this to reflect the importance of the Greensand Ridge Nature Improvement Area.</p> <p>In new buildings, provision of appropriate species-related measures will be required, including, for example, swift bricks, bat and owl boxes and the incorporation of native species into landscaping schemes.</p> <p>Opportunities should also be taken by developers and landowners to link sustainable drainage solutions in new development to complement nature conservation objectives.</p>	<p><u>Policy NE3 – Local Green Spaces</u></p> <p>Delete second paragraph of policy text and replace with:  <b>“Development proposals within the designated Local Green Spaces will be consistent with national policy for Green Belt.”</b></p>
<p><b>Policy LB1 – Supporting Local Business and Agriculture</b></p> <p>Proposals for new employment generating uses on existing employment sites and within the Settlement Envelope, will be encouraged in line with Local Plan policies.</p> <p>Proposals for the development of new small businesses and for the expansion or diversification of existing businesses, including the visitor economy and farm based operations, will be supported, providing that:</p> <ul style="list-style-type: none"> <li>• it can be demonstrated that there will be no adverse impact from increased traffic, lighting, noise or other emissions or activities arising from the proposed development; and</li> <li>• where relevant, it would have an acceptable impact on the character and scale of the rural landscape; and</li> <li>• where relevant, opportunities are taken to secure the re-use of vacant or</li> </ul>	<p><u>Policy LB1 – Supporting Local Business and Agriculture</u></p> <p>Delete the second bullet point criterion within the second paragraph of policy text and replace with:</p> <ul style="list-style-type: none"> <li>• <b>“it would not lead to any unacceptable impacts upon the character and scale of the rural landscape in the area; and”.</b></li> </ul>

<p>redundant historic buildings as part of the development; and</p> <ul style="list-style-type: none"> <li>• the proposals make adequate provision for car parking and bicycle spaces for employees and visitors</li> </ul> <p>Applications for extensions or part change of use of dwellings to enable flexible or home working will be supported, subject to there being appropriate parking and that the residential amenity of neighbouring properties is maintained.</p>	
<p><b>Policy T1 – Car Parking</b></p> <p>Development proposals will provide parking and electric charging points in line with Central Bedfordshire’s parking standards. New commercial and residential developments will provide on-site parking to meet current and future needs, unless alternative and accessible car parking arrangements can be made which do not add to on-street congestion.</p> <p>New development should not result in the loss of publicly accessible off-street car parking. Developments which propose to remove off-road parking spaces will only be supported where:</p> <ul style="list-style-type: none"> <li>• alternative provision is made which increases or maintains the number of accessible parking spaces available on or within the immediate vicinity of the site.</li> <li>• there is justification that proposals are for the greater benefit for the community which outweighs the inconvenience for drivers.</li> <li>• the development would lead to a proportionate change in requirement for publicly accessible parking and the existing public parking is no longer required.</li> </ul> <p>Proposals for new development that provide additional off-road car parking</p>	<p><u>Policy T1 – Car Parking</u></p> <p>Amend the first sentence of policy text to read as follows:</p> <p><b>“Development proposals will provide parking and electric charging points in accordance with Central Bedfordshire Council’s ‘Parking Standards for New Developments’ (2023) and ‘Electric Vehicle Charging: Guidance for New Development’ (2022) Supplementary Planning Documents (SPDs)</b></p>

<p>spaces, to alleviate parking congestion will be encouraged.</p>	
<p>Policy T2 – Provision for Pedestrians, Cyclist and Horseriders</p> <p>New development should include measures that keep traffic speeds low and improve the provision of pavements and access for pedestrians, cyclists, mobility scooters and horseriders. Where they are proposed, new roads, junctions, pavements and traffic management measures should be designed to complement the character of the location and reflect local heritage.</p> <p>The network of footpaths, cycle paths and bridleways that are listed as rights-of way will be retained and new links within the Town, to neighbouring villages, to the proposed Tempsford Interchange Station and to the wider countryside will be encouraged. Provision of a green spine throughout the town and further improvements and links to the Green Wheel will be supported.</p>	<p><u>Policy T2 – Provision for Pedestrians, Cyclists and Horseriders</u></p> <p>Amend the words “rights-of-way” to read “<b>Rights of Way</b>” in the second paragraph of policy text.</p>