

Leighton–Linslade Neighbourhood Plan Consultation Summary of Community Responses

This document provides a summarised overview of the main themes, policy-area feedback, and recommendations emerging from the Regulation 14 consultation responses submitted by residents and community groups.

1. Headline Insights (Ranked by Frequency)

Theme	Mentions	Summary
Active travel, walking & cycling safety	30	Strengthen LCWIP delivery, safer crossings/footways, missing pavements, 20mph near schools, restore rail crossing accessibility.
Connectivity & corridors	28	Joined-up green/blue corridors; avoid blocked strategic links; protect Green Wheel.
Traffic congestion & parking	28	Wing Road, A4146/A505 congestion; protect town centre and station parking.
Community & cultural space	22	Strong preference for a dedicated building, sustainable funding, and co-location with health/advice services.
Draft accuracy & mapping	19	Fix typos, historic inaccuracies, population dates, map clarity issues.
Health hub / healthcare capacity	18	Strong support for a Neighbourhood Health Centre with diagnostics/minor injuries before/alongside housing.
Protect Linslade Wood & fields	16	Request LGS designation for fields near Linslade Wood/Soulbury Rd; protect Aurora Rise.
Energy & climate ambition	16	Future Homes Standard, renewables, BNG, SuDS, measurable carbon outcomes.
Town centre retail mix	14	Reduce vape/gambling outlets; strengthen independents; support evening economy.
Housing mix & affordability	8	70% smaller homes suggested; more social housing; include bungalows.

2. Feedback by Policy Area (LL1–LL14)

LL1 – Centre of Town Renewal

- - Support for heritage-led renewal and creativity.
- - Health facilities should be explicitly referenced.
- - Concerns over housing quantum vs. health and station access capacity.
- - Discourage vape/gambling outlets; preserve Georgian character.

LL2 – Town Centre

- - Support for part-pedestrianisation and “no through traffic”.
- - Opposition to more gambling outlets.
- - Support for health centre in town centre.

LL3 – Bridge Meadow / Canal Quarter

- - Strong protection for Ouzel Water Meadows (no housing).
- - Improve towpath access and crossings; ensure flood-resilient design.

LL4 – Linslade Cluster

- - Urgent need for accessible rail crossing (post-footbridge removal).

Appendix 2 Pre-Regulation Consultation Outcomes

- - Opposition to station parking reduction; desire for refreshment kiosk.

LL5 – Land South of High Street

- - Debate over housing numbers (<100 preferred by some).
- - Retain Duncombe Drive car park.
- - Provide cultural/health/small business spaces; improve walking links.

LL6 – Housing Mix & Type

- - Request for 70% smaller homes; more social housing.
- - Explicit bungalow and accessible homes provision.

LL7 – Local Community Assets

- - Protect Library; need for community hubs; desire for town-wide hall.

LL8 – Green & Blue Infrastructure

- - More ambition on climate crisis, biodiversity targets, water quality.
- - Improve mapping; link pollinator sites; fix Clipstone Brook gaps.

LL9 – Local Green Spaces

- - Add Aurora Rise, Parsons Close, St Barnabas park, Mill Road greenspace.
- - Correct naming/criteria issues; ensure wildlife is included.

LL10 – European Mitigation.

- - Broadly supported; few comments.

LL11 – Active Travel

- - Strengthen LCWIP; require developments to deliver strategic links.
- - 20mph on Vandyke Road; safer school routes; improved bus services.

LL12 – Infrastructure Priorities

- - Health Hub as top priority.
- - Upgrades to A505, retail park access, and congestion pinch-points.

LL13 – Education

- - Minimal feedback; no objections.

LL14 – Energy Efficiency

- - Future Homes Standard alignment; renewables and SuDS encouraged.
- - Protect dark skies; reduce pollution; support community energy.

3. Cross-cutting Issues Raised Frequently

- - Need for improved document quality:
- - Desire for implementation, monitoring and evaluation framework.
- - Additions around economy, tourism, local food, and potential impact of Universal Studios.
- - Boundary/S106 concern: securing funding from developments outside the parish.
- - Requests for workshop/garage spaces; concern over Stoke Road proposals; EV charging expansion.

4. Other comments (not all land use related)

- - Explicitly prioritise a central Neighbourhood Health Centre with diagnostics/minor injuries.
- - Strengthen LCWIP and address missing pedestrian/cycling links and rail crossing access.

Appendix 2 Pre-Regulation Consultation Outcomes

- - Designate Linslade Wood fields & Aurora Rise as Local Green Spaces.
- - Retain/protect station and town centre parking; justify any change.
- - Publish a connectivity policy securing continuous green/blue corridors.
- - Improve draft accuracy, historic data, and map legibility.
- - Retail mix policy discouraging vape/gambling outlets; strengthen independents.
- - Set robust housing mix: bungalows, accessible homes, 70% smaller homes.
- - Include measurable climate/nature targets (BNG, solar, SuDS, retrofit).
- - Deliver a dedicated community/cultural building with sustainable operating model.

LEIGHTON LINSLADE NEIGHBOURHOOD PLAN

REGULATION 14 ANALYSIS NOTE OF STATUTORY BODY REPRESENTATIONS

DECEMBER 2025

1. Introduction

1.1 This report summarises the representations made by the statutory bodies on the Pre-Submission version of the Leighton Linslade Neighbourhood Plan (LLNP) during its 'Regulation 14' consultation period which ran from the 13th October to 30th November 2025. It concludes by recommending main modifications to the LLNP so that it may be submitted to the local planning authority Central Bedfordshire Council (CBC) to arrange for its examination and referendum.

2. Representations

2.1 Representations have been received from:

- Arrow Planning (on behalf of Arnold White Estates Ltd)
- Central Bedfordshire Council (in their role as landowner)
- Central Bedfordshire Council (in their role as LPA and Highways Authority) (received 5th December)
- Cllr Steve Owen
- Edgars Planning (on behalf of Shenley Rise Ltd)
- Historic England
- Knight Frank (on behalf of the Ascott Nominees Ltd and Ascott Farms Limited)
- Mr Smith (landowner – Land at Stoke Road)
- National Grid Electricity Transmission
- Natural England
- National Health Service Property Services.
- National Highways.
- South Bedfordshire Friends of the Earth
- The Environment Agency

2.2 The other statutory consultees were consulted but none have made representations.

2.3 The Environment Agency raised no specific issues on the LLNP.

2.4 The National Grid raised no specific issues but wished to provide mapping to show the location of substations and overhead cables in the LLNP area.

2.5 National Highways responded to state there are no issues with the submission and in general it seeks to enhance sustainable travel (i.e. Policy LL11: Active Travel) which is welcomed. We support the ideology to improve local amenities to encourage sustainable travel and promote neighbourhood travel.

2.6 Mr Smith wished to register his objection to the inclusion of his land at Stoke Road but gave no details for the grounds for objection.

Appendix 2 Pre-Regulation Consultation Outcomes

2.7 It is noted that objections were received in advance of the Regulation 14 in respect of the designation of some sites as LGS when landowners were contacted to be advised of the potential inclusion of their land request initial comments and to advise them of the Regulation 14. One of these objections was from Cemex (Ledburn Quarry) who note they have a permit from the EA to undertake works on the site following unlawful deposits made on the site in 2006 – 08 but who have not made a further representation at the Regulation 14 stage itself. The other submissions who requested the removal of their sites have replied at the Regulation 14 stage and are included below.

2.8 Comments have also been received from the CBC Neighbourhood Plan Officer. There are a number of duplications in respect of comments received from other departments which are dealt with in section 3, but she has raised a query in respect of the level of engagement undertaken in developing the Neighbourhood Plan which needs to be addressed. LLTC officers have provided a response to these queries as follows:

1) Lack of Community engagement

Feb 24 informal engagement was an exercise prior to the council's final decision to go ahead with developing a Neighbourhood Plan in May 2024. The survey was online with drop in sessions in town centre locations on Sat 3 Feb 2024, afternoon of Mon 5 Feb 2024 and evening of Weds 7 Feb 2024. Respondents reported their awareness of the survey through social media, website, local newspaper, word of mouth and "other" (see Q29 responses in summary report). Those without internet were invited to contact the steering group Chair who would input their responses online with them. Social media was Facebook and Instagram.

March – May 25 informal engagement included: social media on Facebook, Instagram and LinkedIn; banners in prominent town centre locations, posters in town council noticeboards (10 throughout the town), presentation at the annual parish meeting in the town centre, in person events on the market on a Tuesday and two Saturdays and in three other locations on weekday early evenings. There were two printed articles plus online mention by the local newspaper and two mentions in the Feb-Apr 2025 Town Council newsletter "About Town" which is delivered to all households within the parish. The SG chair also attended a local business networking event and undertook school engagement.

In addition, the Task Teams have engaged with key identified stakeholders outside of formal engagement windows in developing particular policy areas e.g Buzz Cycles in relation to Active Travel.

All of this will be set out in the Consultation Statement at the submission stage but it would be incorrect to suggest a lack of meaningful engagement. An email will be sent to the Neighbourhood Plan Officer to respond to her comments.

In addition, LLTC undertook a very rigorous exercise to recruit to the Steering Group and to appoint community and stakeholder representatives to the Task Teams working on the development of the Plan, specifically wishing to ensure that a good cross sector of the community was represented. Across the task teams and Steering Group, over 30 members of the local community have helped bring the plan together, representing a diverse range of interest groups in the Town.

2) CIL and S106

List of improvements – see the List of Partnership projects presented to Partnership (Joint) Committee in Sept 2024 and again in June 2025. The document was distributed to CBC officers in Planning, S106, Assets, Place delivery, Libraries, Env Services and Highways in December 2024 and can be dropped into the Plan.

3) Neighbourhood Health Centre – evidence/engagement

Patient survey undertaken by the town's 3 PPGs in 2023 with 5,393 responses. Information presented to town council, CBC, ICB and MPs.

Appendix 2 Pre-Regulation Consultation Outcomes

4,976 strongly agreed that “Leighton Linlade needs its own medical premises for an urgent treatment centre/minor injuries clinic for non-life threatening injuries, medical tests and treatments not currently available from its GP surgeries”.

1,612 had difficulty or failed to attend a hospital/clinic appointment outside the town due to transport problems, distance, inconvenience and ill health.

5,069 said there was not sufficient GP surgeries in Leighton-Linslade for its growing population.

ICB invited to attend town council meetings from 2020 onwards.

ICB attended a public meeting of around 300 people organised by the former MP and held in February 2023.

ICB has attended and presented to a number of CBC OSC meetings.

4) CBC assets at Tiddenfoot Leisure Centre & Land South of High Street.

Officers confirmed that TLC has been raised with Partnership Committee and a briefing requested by Chair Cllr C Leaman. In respect of Land South the Town Council have made ongoing attempts to engage with CBC on this since 2019. The Town Council working party has contacted several other landowners in recent years.

3. Analysis

SUMMARY

3.1 In summary, there are two policies identified through the Regulation 14 Consultation which will require detailed review by the Steering Group. These are policies LL5 Land South of High Street and Policy LL9 Local Green Spaces. Policy LL6 should also be reviewed alongside the Housing Needs Assessment.

Concerns raised with LL9 Local Green Spaces include:

- Sites with existing planning permission being “sterilised”.
- Lack of demonstrably special qualities and robust evidence.
- Procedural failings in early engagement with landowners.

SG will need to review the proposed LGS designations for Van Dyke Recreation Ground, Dunnock Drive, Aurora Rise, Ledburn Quarry, Southcourt Farm and Wyngates Allotments

January 26 update: all sites identified have now been reviewed. As a result, the designation for Southcourt Farm has been reduced in size and the mapping boundary for Van Dyke Recreation Ground corrected to ensure it does not overlap with the CBC owned adjacent brownfield site.

Concerns with LL5 Land South of High Street include:

- Insufficient engagement with CBC as major landowner.
- Spatial Framework considered unevidenced, prescriptive, and potentially unviable.
- Need for proportionate evidence (heritage, ecology, transport, viability).
- Questions around deliverability, including funding a health centre.
- NHS Property Services requests direct engagement with the ICB to ensure any proposed health facility is justified and deliverable.
- Historic England supports heritage-led principles but recommends stronger wording and identification of important views

January 26 update: engagement with CBC and ICB sought in December. No response from either to date (16/01) Historic England comments on policy wording have been added, but SG has decided not to create an additional policy around historic views at this stage.

Appendix 2 Pre-Regulation Consultation Outcomes

In respect of LL6 Housing Mix there is some concern that:

- Current wording may restrict delivery of family-sized affordable homes.
- Needs alignment with the Housing Needs Assessment and Local Plan standards (NDSS, M4(2), M4(3)).
- Risk that grouping all 1–3 bed homes together contradicts evidence.

However, some respondents agree with the policy stating it does agree with the evidence.

3.2 In respect of all other policies within the proposed neighbourhood plan, subject to a minor modification to policy wording and the inclusion of additional supporting text and references to evidence bases, these can be prepared ready for the submission version of the Plan.

Policy	Full Review Required	Minor Wording Changes	Supporting Text changes	Notes
LL1 – Centre of Town Renewal		✓	✓	Clarify terms; reinforce heritage & archaeology elements.
LL2 – Leighton Buzzard Town Centre		✓	✓	Clarify conformity with retail policy; define terminology; add archaeology.
LL3 – Bridge Meadow / Canal Quarter		✓	✓	Remove subjective wording; update supporting text; include archaeology.
LL4 – Linslade Cluster		✓	✓	Clarify wording (change of use, noise, heritage focus area).
LL5 – Land South of the High Street	✓	✓	✓✓ (Significant)	Viability, land assembly, landowner engagement, heritage-led principles.
LL6 – Housing Mix & Type	✓	✓	✓	Align with HNA, CBC housing requirements, NDSS, M4(2)/M4(3).
LL7 – Local Community Assets		✓	✓	Update viability/marketing requirements; NHS flexibility; heritage note.
LL8 – Green & Blue Infrastructure		✓	✓	Add references to CBC GI Strategy & LNRS; biodiversity/climate expansion.
LL9 – Local Green Spaces	✓	✓	✓✓ (Substantial)	Reassess contentious sites; strengthen evidence; fix mapping; add heritage features.
LL10 – Habitat Mitigation	<i>Possible removal</i>	✓	✓	Must reflect ZOI boundaries, SAMM; CBC suggests deletion.
LL11 – Active Travel		✓	✓	Define Active Travel Network; update strategy references; refine bus contributions.
LL12 – Social & Community Infrastructure		✓	✓	Clarify “multi-purpose space”; evidence of need; remove condition references.
LL13 – Education Infrastructure		✓	✓	Update clarity (“where appropriate”); review two-tier references.
LL14 – Energy Efficiency & Climate Change		✓	✓✓ (Extensive)	Viability, enforceability, Passivhaus clarification, remove validation checklist reference.
Appendices A & B – Spatial Frameworks			✓	Include archaeology; update heritage commentary.

Appendix 2 Pre-Regulation Consultation Outcomes

Policy	Full Review Required	Minor Wording Changes	Supporting Text changes	Notes
Vision & Objectives			✓	Strengthen climate, biodiversity, heritage & transport themes.

3.3 A number of the consultee responses have been incredibly supportive of the Plan process in general and many have provided helpful additions and insights which will add clarity and definition to the Plan.

3.4 The representations below suggested modifications to the policies and supporting text of the document. This note focuses only on those of greater substance as all those referencing editorial updates can be addressed by the group in finalising the document. Full Copies of each representation can be found on the Leighton Linlade Neighbourhood Plan website.

STATUTORY CONSULTEES INCLUDING LAND INTERESTS

3.5 Arrow Planning, on behalf of Arnold White Estates, strongly objects to the Leighton Linlade Draft Neighbourhood Plan designating the Dunnock Drive (15C) and Aurora Rise (17A) sites as Local Green Space. They argue the designations are unjustified, conflict with national policy, and would sterilise land that still benefits from extant residential planning permissions and could help meet Central Bedfordshire’s housing shortfall.

Their key points are:

Both sites already have live outline permissions for housing, so LGS designation is contrary to Planning Practice Guidance.

The Council lacks a five-year housing land supply, making retention of developable land important.

The sites are not demonstrably special, offering limited recreational, landscape, wildlife, historic or tranquillity value due to overhead pylons, minimal facilities, and their recent origin as incidental open space.

Designation appears to function as a “back-door” attempt to block development, contrary to national policy and the Basic Conditions for Neighbourhood Plans and concluding that these LGS designations should be removed to ensure the Neighbourhood Plan is sound, policy-compliant, and capable of passing examination.

RESPONSE – SG to review the designations for Dunnock Drive and Aurora Rise.

January 26. These two locations have been reviewed. The planning consents have been built out as per the permission including the housing allocation and as such, none of the approved plans for the sites included development within these locations.

The supporting evidence base (Appendix) has set out the case for the inclusion of both sites, which are supported by the community.

3.6 Central Bedfordshire Council in its role as landowner, objects to policy LL5 Land South of the High Street (and associated Spatial Framework) and inclusion of their land in Policy LL9: Local Green Spaces.

Appendix 2 Pre-Regulation Consultation Outcomes

Key Concerns. Lack of Engagement with CBC – CBC owner of the majority of the land affected by policies LL5 and sole owner regarding LL9 (in relation to Vandyke Road) was not involved meaningfully in plan preparation. Required engagement with CBC as landowner is absent, undermining transparency and proper plan-making.

1. Policy LL5 – Land South of the High Street

Policy LL5 relies on a Spatial Framework that CBC considers unevidenced, overly prescriptive, and not viable.

CBC suggested modified policy wording in respect of LL5 as follows:

“Policy LL5 Land South of the High Street. Redevelopment of the land South of the High Street site, as shown on the Policies Map, will be supported for a mix of uses which may include:

- **housing, including affordable accommodation;**
 - **community facilities;**
 - **employment and leisure uses; and associated green infrastructure. Conserve and enhance the significance of designated and non-designated heritage assets, and the character and appearance of the Leighton Buzzard Conservation Area;**
- Demonstrate that development is informed by proportionate and up-to-date technical evidence, including heritage, ecology, transport, drainage and viability assessments;**
- Provide net gains in biodiversity and enhance access to green space and sustainable travel routes; and**
- Demonstrate deliverability, including how any community uses will be funded and phased.**

Proposals must:

Development proposals should have regard to the Land South of High Street Spatial Framework (Appendix B) as an expression of community aspiration, but applications will be determined in accordance with the development plan and proportionate technical evidence.”

2. Policy LL9 – Local Green Spaces

The proposed Local Green Space (LGS) designation for Vandyke Road Recreation Ground is:

- Incorrectly mapped, including CBC-owned brownfield land suitable for future development
- Unproven, lacking proportionate evidence of demonstrably special qualities. Required by the NPPF.
- Duplicative, adding restrictions beyond existing Local Plan protections (Policy EE13).
- In conflict with sustainable development especially given CBCs 4.85-year housing land supply.

CBC recommends the exclusion of the xxi) Vandyke Rd Recreation Ground, or if the LLNP does not agree with the proposed modification to delete the site from the designation of a LGS and considers that sufficient justification does exist, the designation should omit the CBC owned land.

RESPONSE – SG to review proposed modification to LL5 Policy wording. It is suggested that the mapping for Local Green Space site at Vandyke Rd Recreation Ground is adjusted to exclude the CBC owned ground currently within the defined boundary.

January 26 update – as set out above, a meeting has been sought with CBC to consider revised wording to LL5 but no response received. The mapping for the LGS at Van Dyke Road has been adjusted to ensure it does. Not overlap into the CBC owned Brownfield Site. The LGS proposed designation has been reviewed with the SG who agreed its inclusion was entirely appropriate.

It is noted:

Appendix 2 Pre-Regulation Consultation Outcomes

- 1) In respect of the LGS Policy, paragraph 3.7 of the report (page 12)the author incorrectly notes that *“Where, in the case of housing or for policies that restrict housing: such as Local Green Space, there are no strategic policies with which to assess conformity of a key policy then the basic condition cannot be met in respect of that policy”* The absence of a strategic policy does not prevent BCS being met.
- 2) In respect of 4.32 is also incorrect *“The approval of an LGS designation can only be made by an Examiner where they have made a prior, positive finding that the NP has made provision for sufficient homes. As stated in paragraph 1.23 above the Council cannot currently demonstrate a 5-year housing land supply.”*

There is no requirement for NPs to allocate homes prior to inclusion of a policy to identify LGSs.

- 3) Attempts to engage with CBC Head of Place and Communities commenced in July 2024, when a letter (Appendix A) was sent by the consultants engaged by LLTC to help prepare the Plan. The response indicated no willingness to engage with senior officers nor attend a meeting with anyone other than the Neighbourhood Plan officer, who attended the next SG meeting.

The neighbourhood plan is obviously intended to be locally-led, and the Council, as planning authority, has a role to play in terms of ensuring the strategy meets the basic conditions and complies with statutory requirements. As such, there does need to be a degree of separation between the Council's role in this regard and any involvement in the plan-making process. The Council have an adopted Local Plan, which sets out our policies and objectives for the whole area, and you will hopefully be aware that we are just in the early stages of starting to prepare a new Local Plan. The neighbourhood plan must be in general conformity with the strategic policies within the adopted plan.

In terms of fulfilling the Council's role in supporting neighbourhood plans, we do have a dedicated Neighbourhood Planning Officer, Jane Hubbard, who would be more than happy to meet with you to provide technical support and advice. Jane can also provide advice as to how our emerging plan should be considered when progressing your neighbourhood plan.

I will ask Jane to get in touch with you to have an initial discussion.

To which our consultants wrote back on 26th July 2024 to state:

Thank you for taking the time to respond. We always advise our clients to ensure that they are in conformity with adopted plans and meet basic conditions and of course appreciate that Neighbourhood Plans must be locally led by the community. The PPG on Neighbourhood Planning is clear that there should be proactive information sharing between the LPA and NP groups and constructive engagement and we find that maintaining a dialogue is key to ensuring smooth project progression and as such I would be pleased to meet with Jane to discuss the emerging Local Plan, sharing of evidence bases and so on [..]

My request to you is really about establishing a dialogue with CBC as a landowner and having a conversation about future asset management. The Town Council has aspirations for the Plan which include key locations which are currently owned by CBC and, as such, I believe it is not in the interests of the Neighbourhood Plan to progress policy ideas in these areas in a vacuum, without a clear understanding of the realities of what is achievable and deliverable, particularly in this case around the creation of additional social infrastructure, town centre regeneration and land south of the high street. We do not wish the plan to become an exercise in frustration whereby significant local effort is spent developing policy content only to find that there are fundamental issues which cannot be reconciled.

I would rather manage expectations now than wait until the Neighbourhood Plan has progressed to the Reg 14 stage when CBC are formally responding, hence my request for a meeting if at all possible, either with yourself or an appropriate member of your team before the shape of the Plan starts to develop further. It occurs to me that you may not have been passed a copy of the scoping document for the Plan, so you can see the policy areas under

Appendix 2 Pre-Regulation Consultation Outcomes

consideration, so please find this enclosed as I trust it may be helpful. It is policy area LL4 [Land South of the High Street] where your contribution would be most appreciated as well as LL1 and LL10.

No response was received.

At the subsequent informal engagement stage in early 2025, again CBC were approached this time via the Neighbourhood Plan officer, specifically seeking comments on the draft policies and in particular the Land South report prepared by AECOM.

A response was received stating: *“If you could send over any draft you would like responses on, I can work on these as soon as I receive them, however just to advise they will be ‘very high level’ responses at this stage.”*

The Neighbourhood Plan officer was subsequently sent the link to the draft documentation with a specific request *“in particular [we] would be very keen to receive feedback on the Land South Masterplan.”*

No response was received during the informal engagement period nor any response to a follow up email 6 weeks later asking again for a response from CBC.

Whilst it is therefore correct to state that no meaningful engagement has taken place, it was not due to inaction on the part of the LLNP.

3.7 Cllr Owen, Executive Member for Childrens Services and Community Safety at CBC and a member of the Steering Group raised an objection to the LL5 Land South of High Street for 151 noting that the viability assessment did not support this level of housing and it should therefore be reduced to below 100. In respect of the other policies his support /agreement is noted.

RESPONSE Cllr Owens general support for the Plan is noted. He has provided a number of clarifications and corrections in respect of supporting text which will be addressed in the submission version of the Plan SG is advised to review LL5

January 26 update – the clarifications have been made where considered appropriate. In LL2 a bullet point has been added regarding heritage but “Georgian ambiance” is not a planning term and therefore difficult to demonstrate compliance; this has not been added. The request to add in a refreshment location near the station has also not been added as it may be considered to take business away from existing town centre cafes/coffee shops.

3.8 Edgars Planning submits representations on behalf of Shenley Rise Ltd. Their client owns the allocated housing site HAS34 (land north of Vandyke Road) designated for 138 dwellings in the Central Bedfordshire Local Plan.

Policy LL6 – Housing Mix and Type

- Strong support for the requirement that **at least 50% of new homes** be 1–3 bedrooms, aligning with:
 - Local Housing Needs Assessment (2025).
 - SHMA (2018), which identifies historical oversupply of larger homes.
- Supports accessible homes but requests **review of Clause B** to ensure consistency with upcoming mandatory **M4(2)** building regulation and locally evidenced need for **M4(3)** homes.

Policy LL8 – Green and Blue Infrastructure

Appendix 2 Pre-Regulation Consultation Outcomes

- Support for policy but requests removal of small parcel of the mapped network within their site which has a result of the recent LNRS consultation been removed.

Policy LL11 – Active Travel (Green Wheel)

- Supports the principles of improved cycling/pedestrian connectivity and the Green Wheel initiative.
- The proposals map shows an indicative Green Wheel route crossing their development site
- Requests:
 - Clarification that Green Wheel routes **are indicative**, not fixed.
 - Flexibility so routing can be determined during masterplanning, given the site's residential allocation.
 - Policy wording should ensure development layout is not constrained unnecessarily.

Policy LL14 – Energy Efficiency

- Supports ambition for **zero-carbon-ready** development and high sustainability standards.
- Shenley Rise aims to be an exemplar, net-zero development.
- Requests:
 - Policy allows some consideration of **scheme viability**.
 - Long-term feasibility and enforceability of requirements (e.g., whole-life carbon assessment, climate change statement) be reviewed.

RESPONSE The representation provides support for the plan whilst requesting a small number of modifications. SG to consider the removal of the small parcel of the mapped network within their site and consideration of the amendments requested for policies LL11 and LL14.

January 26 update – a clarification has been added to the supporting text in respect of the green wheel, as requested. The comments regarding M4(2) and M4(3) have been reviewed to ensure the NP complies with both current and emerging NDMPs on building standards as well as responding to identified local need to evidence inclusion. LL14 policy has been revised in view of the viability concern raised.

3.9 Historic England welcomes inclusion of heritage within LLNP **objectives and policies** with specific support for LL1 – LL4. Suggests minor wording improvements such as replacing “attention drawn to” with “design will demonstrate” (**LL2**)

Policy LL5 – Land South of the High Street

- Does **not object in principle** to allocating this brownfield site within the Conservation Area.
- Strongly supports SEA recommendations that LL5 should include explicit **heritage-led design principles**.
- Recommends adding a new clause such as:
“Development will be supported where proposals demonstrate they are heritage-led by preserving and celebrating local character and heritage in design, layout, form, height and massing.”
- They suggest the policy could also include a new clause explicitly guiding future development to be informed by both the Land South of the High Street Spatial Plan and CBC Design Code. (Noting that both documents allow scope for 4-storey buildings, which may be acceptable if well-evidenced and sensitive to local context).
- Emphasises that height and massing must be informed by the **character and rhythm of surrounding heritage buildings** and proposals must be sensitive to ridgelines and historic townscape patterns.

Appendix 2 Pre-Regulation Consultation Outcomes

- Suggests LLNP may wish to identify **key heritage views** to be protected, added into the policy wording as appropriate. Example: view of the **church spire** shown in Figure 28 (Spatial Plan, p.38).

RESPONSE: SG will be reviewing LL5 prior to finalising the Plan and will need to be mindful of these comments

January 26 update – an additional clause has been added to LL5 to accommodate these comments, although the suggestion of a new policy to identify heritage views has been declined at this time.

3.10 Knight Frank on behalf of Ascott Nominees Ltd and Ascott Farms Limited. In summary, raise the following concerns:

1. Overarching Concerns About Soundness of the Plan

- Key failures identified:
 - No housing requirement set; conflict with NPPF expectations.
 - Procedural failings in **Local Green Space (LGS)** consultation.
 - Weak or incomplete evidence base, especially for housing and LGS designations.
 - Subjective/unclear policy wording.
 - Misalignment with Central Bedfordshire strategic policies.
 - Misjudged assumptions about viability and deliverability (especially allocation LL5).

2. Housing Needs and Requirement Setting

- States the LLNP must:
 - Define a housing requirement in consultation with CBC.
 - Identify large and small allocations to meet need.
 - Avoid restrictive policies that would prevent deliverability.
- Their Southcourt site could deliver **1,800 homes**, contributing significantly to housing need.

3. Local Green Space Designations – Procedural Failings

- LGS designations (Policy LL9) considered **procedurally unsound** because:
 - Landowners were contacted only **4 weeks before** consultation—contrary to PPG requirement for “early engagement.”
 - Only **10 working days** effectively allowed for affected landowners to respond.
 - No adequate documentation of landowner engagement in evidence base.

4. Local Green Space Evidence Base – Substantive Deficiencies

- LGS Report lacks robustness:
 - No qualifications listed for the assessor; no ecology or landscape credentials.
 - Very limited survey information—tick-box tables with no detailed evidence.
 - No ecological surveys (Phase 1, species surveys).
 - No transparent methodology for “borderline” designations; no minutes or audit trail.
 - Insufficient alignment with NPPF tests (beauty, historic significance, recreational value, tranquillity, wildlife).
- Calls for a **full re-evaluation**, including transparent scoring matrices and documentation.

5. Objection to Specific LGS Sites

Appendix 2 Pre-Regulation Consultation Outcomes

Southcourt Stud Farm – LGS 59

- Should be excluded because:
 - **Wholly within the Green Belt** → should fail Stage 1 exclusion criteria.
 - Represents an **extensive tract of land** (>10 ha),
 - No detailed evidence of “demonstrably special” qualities.
 - Hedgerows/wildlife claims unsupported by surveys.
 - No public access; limited community value.
 - LGS designation would **block strategic housing delivery**, worsening local housing shortages.
- Request: **Delete LGS 59 from LLNP.**

Wygates Allotments – LGS 24

- Should be excluded because:
 - Also within Green Belt → should fail Stage 1 criteria.
 - Allotments are **private member-based facilities**, not public community spaces.
 - “Food growing” is **not an NPPF LGS criterion**.
 - Lacks evidence of demand, waiting lists, or wider community value.
- Request: **Delete LGS 24 from LLNP.**

6. Housing Mix Policy LL6 – Not Evidence-Led

- LL6 requires >50% of new homes to be 1–3 bedrooms.
- But the HNA recommends:
 - Priority for **3-bed homes (50–60%)**.
 - 1–2 bed homes should make up **10–20%** each.
- Policy incorrectly groups 1–3 beds together, contradicting HNA modelling.
- Accessibility requirements (M4(2), M4(3)) exceed CBC policy without viability evidence.
- Requests rewriting LL6 to align directly with HNA Table 5-9.

7. Allocation LL5 – Land South of High Street: Major Viability Issues

- No evidence of:
 - A viable option
 - Land assembly strategy.
 - Funding for health centre or cultural uses.
 - Delivery mechanisms or phasing plan.
- High risk the site is **undeliverable**, and the plan fails on Basic Conditions.
- Contrast: Southcourt site (~1,800 homes) is promoted as viable and able to deliver SANG.

8. Habitats Regulations Assessment – Need for SANG Capacity

- CBC’s strategy requires contributions for small sites and **on-site SANG** for 10+ units.
- Current LLNP does not demonstrate sufficient SANG capacity for planned development.
- Risk of development moratorium due to inability to mitigate impacts on Chiltern Beechwoods SAC.
- Southcourt site could deliver its own SANG and potentially support wider development mitigation.

9. Active Travel Policy LL11 – Insufficient Evidence and Detail

- Lacks thresholds, funding framework, and evidence of feasibility.
- No engagement with bus operators or CBC transport teams.

Appendix 2 Pre-Regulation Consultation Outcomes

- Green Wheel routes shown on maps could unduly constrain development.
- Requests:
 - Remove mapped routes.
 - Introduce clear contribution thresholds and methodology.

10. Climate & Energy Policy LL14 – Overly Stringent and Unviable

- Requires Passivhaus, whole-life carbon assessments, post-occupancy evaluations with remedial works.
- Exceeds national requirements (Future Homes Standard).
- No viability evidence to justify such high standards.
- May undermine development deliverability.
- Requests alignment with national policy and thresholds for major schemes only.

13. Basic Conditions Statement – Missing and Required

- LLNP relies on a future Basic Conditions Statement that has not been published at Regulation 14.
- This undermines transparency and proper consultation.

RESPONSE: As set out by the respondent, due to the likely level of housing requirement for the Leighton Linlade area requiring the allocation of strategic sites, this is beyond the remit of a neighbourhood plan, nor is the allocation of housing sites in the Green Belt which can only be undertaken through the Local Plan process. As such the Neighbourhood Plan is only able to identify brownfield opportunities given the extent of the Green Belt within the NP area.

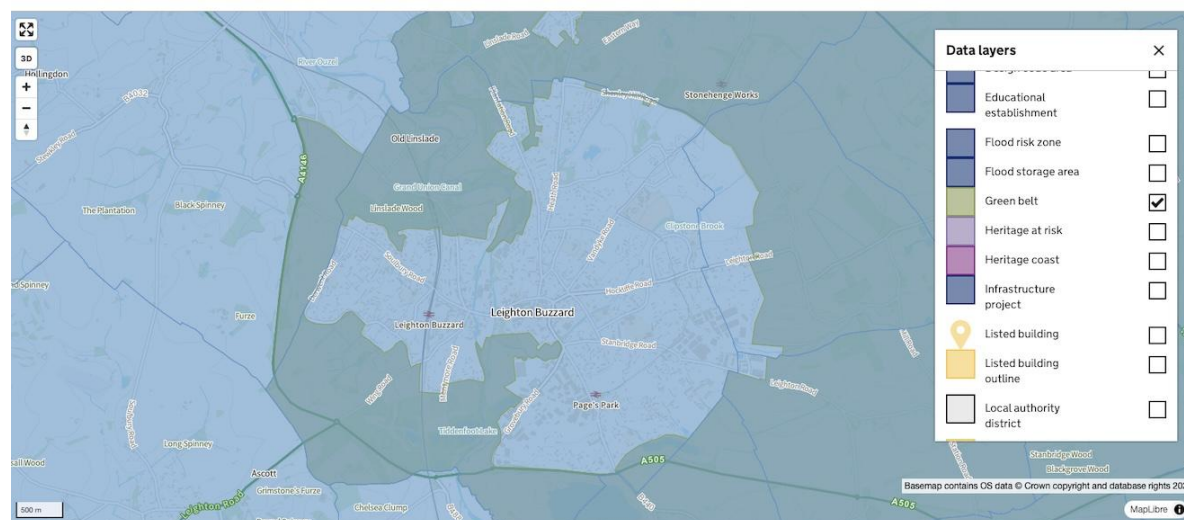


Figure 1 – Green belt boundary at Leighton Linlade.

The respondent raises concern that the Local Green Spaces report has not been backed by specialist ecological survey and questions the credentials of the lead author of the report. Neighbourhood Plans are prepared by community groups. As such, there is no requirement for the author of the LGS report to have specialist knowledge; however, in this case, the author, a local member of the community, has kindly volunteered extensive time and knowledge in the preparation of the report.

The respondent notes his land interests (LGS site 59 & 24) are wholly within the Green Belt. The PPG is clear that a site being in the Green Belt does not preclude designation of LGS. The respondent also considers site 59 to be an extensive tract of land (more than 10 hectares) and that allotments do not meet the criteria, being a private members location, not a community facility. The PPG indicates that there is no upper limit to the size of a “local” LGS, each site is judged on its merits. A number of neighbourhood plans include sites in excess of 10 ha and there are extensive examples of allotments being designated as LGS; often highly valued as social as well as recreational

Appendix 2 Pre-Regulation Consultation Outcomes

spaces. If this land should be released from the Green Belt in the future, the LGS designation would endure to protect this area, which sits within a much larger development parcel.

SG to review submission to consider whether sites 59 and/or 24 should be removed from the proposed LGS policy.

Respondent also seeks updated policy wording to LL6 to better align with the Housing Needs Assessment suggesting updating policy wording as follows:

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

They also raise concern over the use of subjective policy language and risk of failing the soundness test. Neighbourhood Plans are not subject to a soundness test. However, SG should review the language in LL1 – LL5 to confirm the criteria can be consistently applied.

In respect of LL11 and LL14 they suggest rewording the policy as set out in their responses and the removal of the green wheel from LL11 due to lack of evidential basis for inclusion. In response to LL14, the policy has been misread as it has assumed the policy seeks to impose higher than current standards. The policy does not seek this but does seek to incentivise attaining higher standards to exempt them from post occupancy evaluation. However, SG should review these suggested changes to seek whether they could be accommodated.

January 26 update – following review, the Green wheel has been retained, however Southcourt Farm proposed LGS has been removed. LL14 policy has been revised in view of the viability concern raised. In respect of LL6 the local need for older persons accommodation but lack of available locations justifies the retention of the M4(2) policy. Emerging NDMPs also allow for local standards to be set.

3.11 Natural England has submitted the following comments:

1. Housing Allocations and Habitat Regulations

Chilterns Beechwoods Special Area of Conservation (SAC)

- Agrees with the **screening-in** of housing allocation sites located within the **12.6 km Zone of Influence (ZOI)** of the SAC.
- Confirms that **without mitigation**, housing allocations could cause **Likely Significant Effects** due to **increased recreational pressure**.
- If these sites are taken forward for allocation:
 - Natural England must be consulted at planning application stage.
 - A **project-level Habitats Regulations Assessment (HRA)** will be required.
 - Allocations must secure mitigation through:
 - **Strategic Access Management and Monitoring Measures (SAMM)**.
 - **Suitable Alternative Natural Greenspace (SANG)** provision.

2. Site-Specific Comment – Allocation LL5 (Land South of the High Street)

Proximity to Nares Gladley Marsh Site of Special Scientific Interest (SSSI)

- LL5 lies close to a **primary river upstream of the SSSI**, which is highly sensitive to:
 - Water quality changes and water quantity changes
- Natural England therefore expects:
 - Strong compliance with Central Bedfordshire Local Plan water-quality policies.
 - Use of **Sustainable Drainage Systems (SuDS)** and other pollution-prevention measures.
 - Adherence to Environment Agency guidance requiring **minimum 8m buffer** from flood defences or embankments.

3. Green Infrastructure

- Welcomes Objective 7 in the LLNP: creating and connecting good-quality green spaces.
- Notes positively:
 - References to a **green network**, tree planting and permeable paving, and potential wildflower planting within LL5's spatial framework.
- Recommends use of:
 - **Natural England's Green Infrastructure Framework (GIF)**.
 - **GI Standards** and GI "process journeys" for plan-makers.
 - Incorporation of GI standards within **design codes**.

RESPONSE: SG to consider incorporation of comments into relevant policy areas.

January 26 update. The supporting text to LL3 and LL5 has been updated to draw attention to the SSSI and LL8 to recognise the GIF.

3.12 NHS Property Services maintain NHS estate and works with Integrated Care Boards (ICBs) to ensure facilities are safe, modern, efficient and aligned with NHS service needs. They have commented as follows:

1. Policies LL5 and LL12 – Health Infrastructure Delivery

- LLNP supports the principle of a **new Neighbourhood Health Centre**, particularly on the Land South of the High Street allocation (Policy LL5).
- NHSPS agrees there is a **clear need** for additional healthcare capacity in the plan area.
- However, LLTC must **engage early and directly with health commissioners**, especially the **Integrated Care Board (ICB)**, who are responsible for planning and commissioning primary healthcare and must lead on identifying what new health facilities are needed and where they should be delivered.
- Central Bedfordshire Local Plan Policies HQ2 and HQ3 require partnership working with service providers.
- NHSPS warns that without collaboration with ICBs, the plan risks **misaligning health infrastructure delivery** at strategic and local levels.

2. Policy LL7 – Local Community Assets

- NHSPS supports the objective of providing quality community facilities.
- However, **Policy LL7 in its current form could restrict NHS operations**, because:
 - It prevents or delays the disposal or redevelopment of NHS sites even when they are **surplus to clinical requirements**.
 - NHS services must retain flexibility to reorganise, modernise, relocate, or dispose of sites to reinvest in improved healthcare provision.

Appendix 2 Pre-Regulation Consultation Outcomes

Requested Modification to LL7 Clause A as follows:

Proposals that will result in either the loss of, or cause significant harm to, an existing facility will be resisted, unless it can be clearly demonstrated that the operation of the facility is no longer viable or surplus to requirement ~~and~~ or that the facility has been actively marketed for alternative community uses for a minimum of 12 months consecutively or it can be re-provided in an alternative location with the neighbourhood plan area.

RESPONSE: See general comments made in respect of communications and publicity regarding existing dialogue with ICB. SG to review whether additional engagement is required in respect of LL5 and LL12 and to consider the proposed change to the policy wording in LL7.

January 26 update: LL7 Clause A has been updated to accommodate request and meeting requested with ICB in respect of LL5 and LL12. Additional supporting text has been added to LL12 to note the support for a new neighbourhood health centre and the importance of partnership working.

3.13 South Bedfordshire Friends of the Earth has submitted the following comments:

1. Overall Vision

- The vision omits **low-carbon, green-economy and climate-focused ambitions**, despite the Town Council's Climate Emergency declaration (2021).
- Does not reflect the town's substantial achievements in sustainability, including:
 - Two wind turbines, planning permission for a third.
 - The 2014 "Super-Battery".
 - PassiveHaus care home (Marigold House).
 - National pollinator awards and bee-friendly initiatives.
 - Cycle Town project, successful low-carbon bus schemes (Dash Direct).
 - Longstanding heritage of local food markets and refill/reuse shops.

2. Comments on Objectives

Town Centre Objective

- Should reference local food, refill shops, low-carbon economy, heritage, creativity, and cycling culture.

Social Infrastructure Objective

- Requires a **step change**, not merely "expansion".
- Should include a new **health facility** to reduce travel emissions and support wellbeing.

Design & Energy Objective

- Not strong enough; national standards (Future Homes Standard) already mandate high energy measures including solar.
- Huge opportunities exist through local renewables and the National Energy Efficiency Centre.

Transport Objective

- Very weak; does not mention buses despite transport representing nearly 50% of Central Beds' carbon emissions. Evidence shows sustainable transport measures can reduce car traffic by 17–21%.

Appendix 2 Pre-Regulation Consultation Outcomes

Green & Blue Infrastructure Objective

- Omits references to:
 - Biodiversity targets
 - Carbon storage
 - Flood reduction
 - Urban heat mitigation

3. Policy LL8 – Green & Blue Infrastructure

- FOE finds the policy **disappointing**, lacking key ecological, climate and community considerations.
- Missing or insufficient:
 - Biodiversity mapping and targets (e.g., species abundance goals, “30 by 30” commitments).
 - Urban heat mitigation and planting within developments.
 - Flood management, water quality improvements, carbon storage.
 - Recognition of community-managed wildlife sites across the town.
- Highlights failure to record:
 - Pollinator hotspots such as Soulbury Road Bank, Vandyke Curve, Linslade Memorial Playing Fields, Gardens of Remembrance.
- Recommends water quality improvements by:
 - Planting along streams, reducing impermeable surfaces, creating wetland features and ephemeral ponds.

4. Policy LL9 - Local Green Spaces

- FOE supports the listed Local Green Spaces but identifies several **omissions**:
 - Mill Road Greenspace.
 - Greenspace opposite Leighton Middle School.
 - Bank on Soulbury Road and Knaves & St Mary’s Way.
- Incorrect or missing wildlife descriptions in Appendix D for:
 - Regent Street / Miles Avenue amenity space (managed by community for pollinators).
 - Linslade Gardens of Remembrance.
 - Linslade Memorial Playing Fields (hedges and wildflower areas).
 - Adam’s Bottom (three wildlife areas, managed by FOE).
 - Vandyke Loop Meadow (wildflower meadow, not safe for recreation).
 - Stanbridge Meadows (Astral Park Community Orchard rich in pollinators and birds).

5. LL14 Energy Efficiency and Climate Change

- Welcomes having an energy policy but says it is **inadequate** without a clear **renewable energy policy**.
- Recommends:
 - Encouraging microgeneration and battery storage in all new developments.
 - Capitalising on local renewable assets: wind turbines, solar farms, super-battery.
 - Making Leighton Buzzard a **leader in renewable energy technology**.
- Good foundation but missing:
 - Reference to solar panels (required under Future Homes Standard).
 - Alignment with UK legally binding carbon targets.
- Suggests including **creepers/living walls** to reduce heat and increase biodiversity (TCPA evidence).
- Calls for collaboration with:
 - Buzz Community Energy
 - Grundfos

Appendix 2 Pre-Regulation Consultation Outcomes

- National Energy Efficiency Centre
- Requests:
 - A **Local Area Energy Plan** for the town.
 - Requirements for commercial premises to source power from local renewables.
 - A **renewable-energy HGV charging station** for the logistics sector.

6. LL14, Active Travel and Buses

- Described as **very weak**; “encouraging” is not enough.
 - Calls for:
 - **Priority for active travel and buses** over private cars in new development design.
 - Guaranteed walking and cycling connections into the wider network, not blocked by private landowners.
 - S106 contributions for strategic routes (e.g., Scholar’s Way).
 - Buses must:
 - Run at least every **30 minutes**.
 - Have strong publicity and reliability.
 - Include socially necessary routes for elderly residents.
 - Improve links to Milton Keynes.
 - Notes evidence: sustainable travel measures can reduce car use by **17–21%**
-

RESPONSE: SG to review vision and objectives and consider proposed updates to LL8, JB to liaise over LL9. IN respect of LL14, the SG made a conscious decision not to include a renewable energy policy but should consider the inclusion of the requests in the supporting text. In respect of LL14, unfortunately the plan cannot mandate walking and cycling connections nor the frequency or routing of buses.

January 26 update: ONH and JB have reviewed the comments in respect of LL8 and LL9. Updated mapping of the GI network/Biodiversity network will be added to the policy. In respect of LL9, whilst the LGS assessment highlights the principal reason for designation in each location, reference to wildlife value will be added as noted by the respondent. In respect of any potential LGS site omitted from the NP, CBC are now also undertaking a call for sites, as such, the details of these potential locations can be highlighted with CBC for assessment. LL14 has been updated in the supporting text to highlight a number of points raised. The overall objectives of the plan have been updated by officers to accommodate a number of the comments raised.

3.14 CBC Public Health Built Environment has responded in support of the Plan but requesting more focus on public health.

General Comment

- Recommends **adding explicit reference to “health inequalities”** within the relevant policy wording.
- Suggests wording such as:
 - “...and health inequalities will be reduced...”
- Indicates an expectation that planning policy should actively contribute to reducing disparities in health outcomes.

LL8 and LL9 Local Green Spaces, Green & Blue Infrastructure

- Recommends a more specific reference to the inclusion of play areas and children’s spaces within local green spaces.
- Suggests strengthening the policy to acknowledge public health functions more explicitly.

RESPONSE: SG to review policies in view of the comments made.

January 26 update: text has been updated to give more focus to public health.

3.15 CBC Strategic Housing has commented on LL6 Housing Mix and Type

- Point A There are some concerns over the current drafting of Point A of Policy LL6 as it would significantly impact affordable housing. The affordable housing needs and requirements represent a need across the board from 1 bed to 4 bed. It is important any future housing delivery in Leighton Linlade enables the delivery of the affordable housing of need and not prejudiced by the delivery of significantly larger quantum of smaller homes as captured by draft Policy LL6. Internal waiting list information indicates a significant need for family 3 & 4 bed social rented and affordable rented accommodation. Concerns with the current drafting regarding whether the delivery of such key dwelling types will be hindered through current drafting of LL6.
- Point B . It is important for Policy LL6 to factor in Nationally Described Space Standards (NDSS). NDSS form a requirement of adopted Local Plan Policy H2, Housing Standards, whereby all new build dwellings are required to meet the space standards. Any new build development within Leighton Linlade will be required to comply with the NDSS. The Policy as written does not provide for clear clarity to the development industry on the requirements for M4(2) and M4(3). This aspect of the Policy should align with adopted Local Plan Policy H2, which requires:
 - 35% M4(2) adaptable homes
 - 5% M4(3) wheelchair adaptable homes

Policy LL6 could then encourage developments to deliver more than current Local Plan Policy requirements. The alignment with Local Plan Policy would provide developers with clear clarity on requirements.

RESPONSE: SG to review policy LL6. It is noted that the LLNP can set a different standard to Policy H2 if evidenced and The Policy does not need to repeat local plan policy on NDSS as covered in H2.

January 26 update: Clause A has been updated slightly to be less prescriptive but still achieve the desired mix as evidenced by the HNA. In respect of Clause B the policy is confirmed as unchanged. The emerging NPPF Policy PM13 bi) and HO5 state new development should reflect local need and ensure that at least 40% of new homes are M4(2) or M4(3) – as such the policy is felt to be appropriate in its current form and evidenced by the HNA.

3.16 CBC Sustainability Manager notes support for LL14 but concerned that it is too onerous and unable to be achieved under current planning procedures/processes. Robust evidence that policy is technically feasible and financially viable needs to be submitted. The policy needs to demonstrate which elements of LL14 are aimed at domestic or non-domestic developments. Is there evidence to support the PassivHaus (or equivalent) for the LL area uplift for all buildings (again is this dom and non dom), is it an unreasonable request above the Local Plan Policy of CC1?

RESPONSE: It is disappointing that the Sustainability Manager feels that meaningful measures to improve energy efficiency, despite CBC seeking to be carbon neutral by 2030 are still considered too onerous to apply in 2026. The policy does not seek to set a higher standard but incentivises those who seek to attain it. However, it is

Appendix 2 Pre-Regulation Consultation Outcomes

suggested the SG review the policy wording in view of these comments in order to ensure that the policy can be retained in the Plan in some form but willing to be implemented by CBC.

January 26 update. The policy has been updated to differentiate between residential and non-residential and has removed the post occupancy evaluation on the basis that CBC considers it too onerous to be achieved.

3.17 CBC Planning Policy has provided a detailed response which is set out in the table below. This is followed by the comments from Planning Implementation, Strategic Transport and Archaeology.

CBC Planning Policy Comments.

NPPF Conformity	SECTION OF CBCLP	Policy	Regulation 14 Comments	LLNP Response
conform		LL2 Leighton Buzzard Town Centre	<p>The policy does not entirely conform with Local Plan Policy R1as it states that proposals for retail, as well as community and social uses, such as health and wellbeing and cultural uses will be supported within the Primary Shopping area. Local Plan Policy R1 promotes only retail within the primary area and other uses within the town centre boundary, outside the Primary Shopping Area.</p> <p>As a result, the policy fails to state changes of use away from retail will not be supported within the Primary Shopping Area, unless it can be satisfactorily demonstrated that the units have been marketed for a period of six months.</p>	<p>SG to discuss – there does need to be an appreciation that town centres are changing and are not just about retail. Are there examples of non-retail provision in LL town centre already?</p> <p>The Neighbourhood Plan’s support for experiential, community and social uses within the Primary Shopping Area is consistent with the NPPF (Dec 2024). Paragraph 90(a) requires town centres to be allowed to “grow and diversify” with a “suitable mix of uses (including housing)”, while paragraph 90(b) expects plans to define town centres and primary shopping areas and “make clear the range of uses permitted” in them. The Annex 2 definition of a Primary Shopping Area refers to an area where retail is concentrated, not exclusive, and paragraph 54(a) refers to protecting the “essential core” of a PSA, not preserving it as retail-only. A flexible mix of experiential, cultural and community uses in the PSA therefore implements, rather than conflicts with, national policy on ensuring the vitality and viability of town centres.</p> <p><i>January 26 update - In respect of Policy R1 –The SG have confirmed there are already nonretail uses within the PSA under the wide remit of use class E as well as other permitted development changes of use. As such it does not appear that CBC have been able to condition limits of</i></p>

Appendix 2 Pre-Regulation Consultation Outcomes

				<i>class E uses within the PS. However the 6 month marketing period has been added to the policy</i>
As above		LL3 Bridge Meadow/Canal Quarter	This policy extends the Council's saved allocation further north. The Council prepared a brief (2012) to showcase the opportunity and aspirations for development on the smaller parcel, south of Leighton Road. Can the Town Council demonstrate the viability of the allocation and the desire from the landowner to develop the site in the proposed way, in order to demonstrate the site is deliverable?	No, it is not a site allocation and as such would not be proportionate to prepare a viability assessment. The policy just updates the brief previously prepared by CBC by setting out development principles for the site to the south and identifies principles for any future redevelopment of this important riverside corridor both north and south of Leighton Road.
As above		LL4 Linslade Cluster	The policy conforms with the main principles of Local Plan Policy R1, T1 (Mitigation of Transport Impacts on the Network), and T4 (Public Transport Interchanges). Can the Town Council demonstrate the viability of the development sites and the desire from the landowners to developed the site in the proposed way, in order to demonstrates the sites are deliverable?	See above. <i>January 26 update: The policy reflects the thinking not only of the brownfield first principles but the recognition that land around stations is key to unlocking sustainable development opportunities and active travel opportunities which is also highlighted in the new draft NPPF. As such this is not a "site allocation" and does not preclude other proposals coming forward but demonstrates support for these types of uses identified as appropriate in this location and considers principles which should apply to them should they come forward. Supporting text has been updated to reflect this.</i>
As above		LL5 Land South of the High Street	The 2012 Development Brief for this site proposed: retail (to extend the primary shopping area), car parking, food and drink uses, ancillary A2 uses, and the potential for Beds and Luton Fire Service to be relocated at this site. In addition it was proposed for a further parcel: retail (Use Class A1), food and drink, civic, community and leisure uses; housing, residential care home and the retention of the existing post office. The allocation policy does include elements which are in conformity, however a reworked masterplan was prepared in 2023 and the allocation policy reflects the new masterplan, with some amendments from the development brief. The NP proposes more residential	The NHS have responded to the Plan and the concept of allocating land for a health centre and further dialogue will continue within them. See notes above in terms of landowner engagement. The Reg 14 was supported by a viability assessment for the site. It is noted that this was based upon market housing and demonstrates the financial constraints of bringing this site forward. The Plan will need to signpost to gap funding sources such as the Social and Affordable Homes Programme (SAHP) would be required for better viability.

Appendix 2 Pre-Regulation Consultation Outcomes

			development in order to fund community benefits, such as a Health Centre. Has the Milton Keynes, Bedfordshire and Luton Clinical Commissioning Group been consulted on the proposed allocation of land for a Health Centre? Can the Town Council demonstrate the viability of the allocation? Has the landowner be engaged and are they in agreement that the land can come forward in the manner proposed in the NP?	
Conforms		LL8 Green and Blue Infrastructure	<p>The NP refers to the draft LNRS. It should be noted that adoption of the LNRS is being sought at the Council's December Executive committee and therefore the reference can be updated following the adoption.</p> <p>No mention is made in the NP policy to the Council's Green and Blue Infrastructure Strategy and GI Plans. This could be included in the first paragraph of policy LL8 after the Local Nature Recovery Strategy and before local aspirations.</p> <p>Please note that there are parcels of land, identified on the Proposals Maps, which are located in areas that have been submitted through the Local Plan call for sites for residential and mixed-use schemes.</p>	SG should update policy in respect of LNRS. Whilst it is noted that some parcels of land for inclusion have been submitted in the call for site sites this does not by definition mean that they are suitable for development.
conforms		LL9 Local Green Spaces	<p>Section 15.4 of the Local Plan supports the principle of Local Green Space being designated in neighbourhood Plans, where a clear and robust methodology consistent with Government guidance has been followed.</p> <p>It is worth noting the Central Bedfordshire Council have received some sites through their Call for Sites which may be located in areas identified for designation of Local Green Space.</p>	<p>Noted that some of the sites have been identified through the call for sites but at this stage will not have been allocated, which would preclude the designation. As noted from the comments from other respondents the SG will review the proposed list.</p> <p><i>January 26 update : as a result one location from the call for sites has been removed as an LGS – Southcourt Farm.</i></p>

Appendix 2 Pre-Regulation Consultation Outcomes

<p>conforms.</p>	<p>CC1</p>	<p>LL14 Energy Efficiency</p>	<p>The policy requires conditions to be placed on development for a Post Occupancy Evaluation Report to be submitted to the Local Planning Authority, in accordance with Policy CC1.</p> <p>The policy requires major development to be accompanied by a Whole Life-Cycle Carbon Emission Assessment, to demonstrate actions taken to reduce embodied carbon resulting from the construction and use of the building over its entire life. This is not in the Local Plan policy, however the LP requires a Sustainability Statement which covers the same requirements. There is the potential for duplication and confusion for applicants.</p> <p>The NP states that the requirement for Whole Life-Cycle Carbon Emission Assessment will be added to the CBC Validation Checklist for outline and full planning applications applying to proposals in the Neighbourhood Plan area until such a time that there is a district-wide requirement. DM team will need to advise whether this can be added to the Validation Checklist, as it needs to be set by CBC.</p> <p>In addition, the NP states that “there is no current adopted development plan policy which seeks to deal with the performance gap. In the absence of supplementary guidance from CBC on POE, guidance has been included in Appendix F.” This should be amended to read Appendix E. The measures in this policy may have resource and budgetary implications for CBC and will need to be agreed with the relevant teams.</p>	<p>Local Plan policy CC1 already applies the requirement for a Sustainability Statement, but this only applied to major develop(both residential and non-residential. LL14 extends this requirement to all but householder applications.</p> <p>In addressing the issue over whether the requirement for a Whole Life Carbon Assessment can be added to the validation list, the request can be moved to form part of the Sustainability Statement for major developments.</p> <p><i>January 26 update: The policy has also been updated to reflect the direction in the emerging NPPF to ensure the policy is not perceived to be setting a quantitative standard.</i></p>
------------------	------------	-------------------------------	---	--

Appendix 2 Pre-Regulation Consultation Outcomes

CBC Response from Planning Delivery.

Page of L&LNP	Specific Text	Regulation 14 Comments	LLNP response
LL1		<p>c) refers to 'interesting independent businesses' - clarification is needed on what is meant by interesting – note that NPPF does not differentiate between independent and other businesses.</p> <p>h) Need to clarify what is meant by low-car enabling residential development</p>	<p>SG to consider clarifications.</p> <p>Jan 26: Policy wording updated for clarity</p>
LL1	Supporting Text	The NP States 'there is capacity to bring forward up to 400 new homes.' Need to clarify how this has been assessed and whether this is just for the town centre.	Confirm that this is just within the NP sites in LL1 – LL5 in the town centre.
LL2		<p>D) Need clarification on what is meant by 'imaginatively reactivating historic spaces'</p> <p>G) Need clarification on what is meant by 'experiential business'</p>	<p>SG to consider clarifications</p> <p>Jan 26: Policy wording and supporting text updated for clarity</p>
LL3		A) Need to remove references to creative and imaginative from the policy wording - this is not appropriate for a policy.	<p>SG to consider using the supporting text to explain exactly what “creative” or “imaginative” means in the context of the policy (e.g., innovative solutions to site constraints, use of local materials, distinctive design responses) with criteria or examples that decision-makers can use.</p> <p>Or reword the policy to frame the wording better, such as “Schemes are encouraged to explore creative approaches, such as... (examples).”</p>

Appendix 2 Pre-Regulation Consultation Outcomes

LL3	Supporting Text	<p>Whilst it is expected that proposals to the north of Leighton Road may come forward piecemeal, over the longer term as changes of use come forward in response to changes in shopping habits and/or big box retail provision, the land to the south of Leighton Road (known as Bridge Meadow) has long been envisaged as a comprehensive scheme.</p> <p>Suggest that some of the above wording is deleted.</p>	SG to consider supporting text update.
LL4		<p>A) ii) Change of use at ground floor level to residential at ground floor level will not be supported unless it can be demonstrated that they would not be result in an erosion of the function of the local centre. Need to remove 'ground floor level' and 'be'. How would compliance with this aspect of the policy be demonstrated?</p> <p>A) iii) The last section of this policy needs to be reworded. B) Wording is unclear and concerns re: encouraging residential use in this location due to noise. Does the area have underutilised parking?</p>	<p>Wording to be updated and supporting text to detail how compliance would be demonstrated.</p> <p>A)iii to be updated.</p> <p>In respect of B the NPPF is likely to be promoting default planning permission near stations. SG to confirm the parking position.</p>
LL5		A) Proposes a new neighbourhood health centre – have discussions taken place with the relevant ICB re: need and location requirements?	See previous comments from NHS.
LL5	Supporting Text	Final paragraph states, <i>'whilst the policy supports the provision of a lower parking standard for residential parking in this location...'</i> However, this is not clearly specified in the policy wording and clarification is therefore needed.	SG to review LL5 as per previous comments.
LL8		<p>C) Do not consider that this should apply to all proposals i.e. changes of use, household extensions. Clarification needed on types of development this should apply to.</p> <p>D) 'Proposals within built up and previously developed areas will be required to create new natural green spaces, providing benefits for wildlife and people, particularly where there are existing greenspace deficits.' – This might not be appropriate as this could conflict with historic aspects, particularly in the town centre.</p>	<p>Policy to be clarified.</p> <p>Development should be able to create new natural green spaces, even if these are small pockets or on rooftops; there need not be conflict with historic aspects of the town.</p>

Appendix 2 Pre-Regulation Consultation Outcomes

LL9		<p>Suggest the Local Green Spaces listed under A are numbered rather than use of roman numerals.</p> <p>B) Should not use the term ‘very special circumstances’ as this is a specific consideration of Green Belt policy so would be confusing.</p>	<p>Very special circumstances is exactly the correct wording as the LGS designation is aligned Green Belt policy and clearly set out in the NPPF(§108)with reference to chapter 13 and §153</p>
LL10		<p>Not correct - needs to discuss mitigation and be reworded. Suggest they refer to the uses specified in the mitigation strategy. Consider this policy as unnecessary as it is a statutory requirement that should be complied with. Wrong to state all net new housing as some of the NP area falls outside of the Zone of Influence.</p> <p>No reference has been made to SAMM.</p> <p>Should only refer to CBC Mitigation Strategy as an option – other options are available to applicants.</p> <p>Suggest this policy is removed</p>	<p>Consider updating policy wording to recognise that not all of the parish is within the zone of influence or removal of policy.</p> <p><i>Jan26 : Policy removed.</i></p>
LL11		<p>D) All major residential developments must incorporate or fund measures that improve local bus services, including but not limited to, route extensions,</p> <p>Suggest the above is amended to say where appropriate rather than must as any contributions must meet relevant tests.</p>	<p>SG to consider modification to policy wording</p> <p><i>Jan26 : wording updated.</i></p>
LL11	Supporting Text	<p>The Policies Map shows the full extent of the existing active travel network, which allows applicants to determine if their proposals should take this policy into account. Where proposals include provision for landscaping, new means of access or new layouts, there may be an opportunity to relate the land better to the Network and/or improve the attractiveness of rural routes. At the very least, the policy requires that proposals that will undermine the existing value of the Network will be refused permission.</p> <p>Should not say refused as this is a strong stance and planning must balance all issues when making a decision.</p>	<p>This is supporting text not policy wording so ‘refused’ is permissible but SG to consider modification of text as appropriate.</p> <p><i>Jan26 : wording updated.</i></p>

Appendix 2 Pre-Regulation Consultation Outcomes

LL12		<p>What is meant by a multi-purpose space? Is this indoor or outdoor provision? The same applies to the spaces specified in 3 and 4. What evidence of need is there for the requirements listed in 1-5?</p> <p>B) Reference to planning condition should be removed as social infrastructure cannot be secured through conditions. C) repurposing should be replaced with repurpose.</p> <p>Suggest that Lisa White is consulted on this.</p>	<p>Clarify in policy that 2, 3 and 4 reference indoor facilities.</p> <p>Update B & C as appropriate.</p> <p><i>Jan26 : wording updated.</i></p> <p>Not sure who Lisa White is – SG to enquire.</p>
LL12	Supporting Text	<p>The final paragraph provides a list of examples that CBC are collecting developer contributions for. Suggest this is removed as this information is time limited/specific to development depending on its location within the town.</p>	<p>SG to consider removal</p> <p><i>Jan26 : wording removed.</i></p>
LL13		<p>A) This should state that such proposals will be supported where appropriate and taking into account other material planning considerations.</p>	<p>SG to consider updating A.</p> <p><i>Jan26 : wording partially updated.</i></p>
LL13	Supporting Text	<p>Post amble is not relevant to the intended purpose of the policy. Should be more related to planning issues rather than a review of the education system.</p> <p>Transition to two tier could change. Best not to state this.</p>	<p>Supporting text sets out the reason the SG wished to have this policy so may be considered relevant. Request update on current position.</p> <p><i>Jan26 : wording partially updated to reflect transition to two tier as an example in case it changes.</i></p>
LL14		<p>B) Unclear why the other requirements in part A would no longer apply. C) Crossing over into building regulations.</p> <p>Would suggest this only applies to major development.</p> <p>Need to consider heritage implications. D) Would question whether this is a reasonable request and whether it goes beyond what is required for a planning application. Suggest consultation with Stephen Mooring’s Team. E) Not sure this is a reasonable requirement to validate an application.</p>	<p>As detailed above, policy has been updated, although it will still apply to all development other than householder with the WLCA for major as part of the current validation requirements.</p>

Appendix 2 Pre-Regulation Consultation Outcomes

LL14	Supporting Text	<p>The supporting text indicates that there would be flexibility in meeting local design guidance, especially in terms of prevalent building orientation and density. This point is not agreed – design should not be compromised and it is important to consider all aspects of a development.</p> <p>The supporting text specifies that a PHI and Quality Approved Passivhaus certification will be required and secured by condition. These requirements seem very onerous and there is concern that the conditions would not meet the tests.</p> <p>The supporting text specifies that Clause D of Policy LL14 applies to all development proposals (except householder) but the policy wording refers to major development only. This discrepancy needs to be addressed.</p> <p>The supporting text specifies that the Policy LL14 requirements will be added to the CBC Validation Checklist – this should be deleted as the checklist is determined by CBC.</p> <p>The supporting text relating to Clause E is unclear.</p>	<p>As stated above, it is disappointing that CBC have taken such a negative approach to LLTC seeking to address energy efficiency through development – however, the policy will be reviewed in light of these comments.</p> <p><i>Jan26 : wording partially updated.</i></p>
4.1	Information paragraph	Suggest the first sentence is reworded as follows - The NP will be a material planning consideration in the assessment and determination of planning applications by CBC.	This suggested change is not accepted. It forms part of the development plan rather than being a material consideration and this has now been made explicit.
4.2		<p>Reference to ‘determine its planning application decisions’ implies that LLTC are the decision maker. This is confusing.</p> <p>The final sentence of this paragraph indicates that LLTC will ensure the NP policies are applied correctly by applicants and officers in their decision reports. The onus should be on the TC to identify relevant policies from the NP and these should be referenced in their consultation response on planning applications.</p>	<p>Wording will be updated to avoid confusion</p> <p>Noted.</p>

Appendix 2 Pre-Regulation Consultation Outcomes

CBC Strategic Transport Comments.

Topic	Specific Text	Regulation 14 Comments	LLNP response
Paragraph 2.9	<p>'The Central Bedfordshire Transport Strategy LTP3 (2011 – 2026), includes a number of strategies that are relevant to this Neighbourhood Plan. Of particular relevance are the following:</p> <ul style="list-style-type: none"> • Sustainable Modes of Travel to Schools and Colleges Strategy • Walking Strategy • Cycling Strategy • Car Parking Strategy • Interim Parking Management Strategy <p>Transport Strategy LPT4 is due to be adopted by Central Bedfordshire Council in Summer 2026 and its progress will be kept under review as the neighbourhood plan progresses. '</p>	<p>Refer instead to 'CBC's Local Transport Plan 3 (2011 - 2026)' and CBC's forthcoming LTP4. Please note, timescales for the draft LTP4 have changed. Consultation on the draft LTP4 is now anticipated to take place during 2026. Adoption will follow subject to any post consultation changes.</p> <p>Some of the referenced documents have now been superseded:</p> <ul style="list-style-type: none"> • The Sustainable Modes of Travel to Schools and Colleges Strategy is currently being updated and its new title will be 'Sustainable Modes of Travel to Schools Strategy'. • The walking and cycling strategies are due to be replaced by a combined 'Active Travel Strategy' which is currently in draft. • The Car Parking Strategy and Interim Parking Management Strategy have now been superseded by the following documents (links provided adjacent): Parking enforcement strategy, On street parking management strategy, Parking standards for new developments - supplementary planning document. <p>A further Off street parking management strategy is anticipated to be developed in the early years after LTP4's adoption. Document links should be added as new documents are</p>	<p>Noted. Update wording accordingly.</p> <p><i>Jan26 : wording and links updated.</i></p>

Appendix 2 Pre-Regulation Consultation Outcomes

		published. Links are provided adjacent for those that have already been adopted.	
Paragraph 2.9		Text refers to strategies emanating from LTP3. Due to the age of LTP3, reference could also be made to other policy documents (of relevance) that have been produced since LTP3's adoption. Examples include: Leighton Linlade Local cycling and walking infrastructure plan, Freight Strategy ,the Bus Service Improvement Plan and Electric Vehicle Infrastructure Strategy. Links provided adjacent.	<i>Jan26 : wording and links updated.</i>
Policy LL1: Centre of town renewal	Be easy and pleasant to move around on foot and wheeling, encouraging non-car uses for short trips to reduce congestion and cut pollution, including pedestrianisation measures where these are locally supported.'	Consider rewording for clarity: 'encouraging non - car modes of transport'. Consideration also as to whether the Town Council feel it would be beneficial to expand this to incorporate travel by bicycle.	SG to consider updating text <i>Jan26 : wording updated.</i>
Policy LL1: Centre of town renewal	...including low-car enabling residential development for all ages and vital local services, designed to complement its special surroundings'.	It may be beneficial to briefly state how such development would be delivered - e.g. reference to providing connectivity via active and sustainable modes of travel and proximity to services.	SG to consider updating text <i>Jan26 : wording updated.</i>

Appendix 2 Pre-Regulation Consultation Outcomes

Leighton Linslade Neighbourhood Plan Vision	Improving and incorporating blue and green spaces that will provide easy access for residents to enjoy the local countryside and improve health and wellbeing'	This could be strengthened through noting access via active and sustainable modes of travel.	SG to consider updating text <i>Jan26 : wording updated.</i>
Policy LL2: LB Town Centre	In support of this policy attention is drawn to the CBC 2023 Design Guide which also contains details on Shop Fronts and the CBC 2023 Parking Standards which details the appropriate level of vehicle and cycle parking within new development including town centre locations.'	The links here didn't work and so it wasn't possible to confirm if the correct documents were referenced. Current documents are provided in the adjacent links.	Check links. <i>Jan26 : links checked.</i>
Policy LL3:Bridge Meadow/Canal Quater	...demonstrate how they improve both the area around the canal and connection between the two centres of Leighton Buzzard and Linslade...'	Consider clarifying connectivity. Connectivity in general (i.e. including car travel) or active and (or) sustainable modes of travel?	SG to consider clarifying text <i>Jan26 : wording updated.</i>
Policy LL3:Bridge Meadow/Canal Quater	maximise opportunities to strengthen active travel connections between Leighton Buzzard and Linslade including routes alongside and over the canal and river, including proposed Green Wheel routes, Local Cycling and Walking Infrastructure Plans and improving access to the Town Centre and to local green spaces, and facilitate bus or Digital Demand Responsive Travel use into and through the area.'	Consider whether latter part of sentence should be a point in its own right?	SG to review,
Policy LL4: Linslade Cluster	New cycle parking, walking and cycling routes around the Heritage Focus Area, ...'	May be beneficial to add 'Secure' to cycle parking.	SG to consider clarifying text

Appendix 2 Pre-Regulation Consultation Outcomes

Policy LL4: Linslade Cluster	Where required to deliver Ai) and Aiii) support will be given for enabling residential development through the re-purposing of underutilised car parking area(s) at the Station, where it can be demonstrated that there is no significant harm to the setting of the adjacent designated heritage assets. '	Do the Town Council have data to support this? Plans would require discussion with the landowner and may also require planning permission.	Absolutely would require permission. It has already been announced that the new NPPF will be looking at default permission in such locations and as such, the policy looks to ensure that if development does come forward it can enable the community aspirations in this area.
Policy LL5: Land South of the High Street	Whilst the policy supports the provision of a lower parking standard for residential parking in this sustainable location, this should not result in the unintended consequence of creating additional parking pressures on surrounding local residential roads. As such, the Neighbourhood Plan would support measures by Central Bedfordshire Council, where required, to introduce parking controls through the imposition of residential zones to ensure the availability of parking for existing local residents.'	Development would be subject to the parking standards set out in CBC's Parking Standards for New Developments - link provided adjacent.	SG to review but as has been seen on other developments within the CBC area such as Dunstable Library – low or no car developments have been approved contrary to the Parking Standard and in accordance with section 4.9 of the standard relating to car free developments.
Policy LL8: Green & Blue Infrastructure	D. Proposals for new development requiring the provision of on-site open space will be supported where the design of open space is integral to the scheme and is effectively connected to any adjoining green infrastructure assets...'	Statement is welcomed. Consideration could be given to stating how connectivity will be improved. E.g. do the Town Council mean by active and sustainable modes, or all modes including car?	Connectivity relates to the GI network itself not how people move through the network.

Appendix 2 Pre-Regulation Consultation Outcomes

Policy LL8: Green & Blue Infrastructure	Continue to develop and expand road verge management that supports biodiversity, with 'cut and collect' regimes timed to benefit appropriate flowering species'	The action would require discussion and input with the relevant teams within CBC.	Yes, noted.
Policy LL11: Active Travel	A) Development proposals on land that lies within or adjacent to the Network should avoid harm, should sustain and where practicable enhance the connectivity of the Network by virtue of their layout, means of access and landscape treatment, including the creation of safe and suitable links to the existing footways, footpaths and walking routes.'	Should Policy LL11 in fact be 'Active and Sustainable Travel' to incorporate bus and rail? In light of the opening paragraph of this policy, should point A also mention cycling routes in the latter part of the sentence.	Noted. SG to consider updating <i>Jan26 : wording updated.</i>
Policy LL11: Active Travel	The Active Travel Network identifies opportunities where public realm improvements are required to enhance the walking, wheeling and cycling environment, improve residential amenity, improve connectivity between community and recreational facilities, schools and the railway station, improve highway safety and create new links into the town centre across the Grand Union Canal and the River Ouzel. Proposals which deliver opportunities for such improvements will be supported, where proposals also accord with the other policies of the Development Plan.'	In a similar way to point B of the policy, should this point also make reference to avoiding measures that would adversely affect ability to implement improvements? It would be useful to set out what is meant by Active Travel Network - what elements of the map constitute the network? Furthermore, does further detail exist on the improvements required? If so it would be beneficial to refer here to where information is contained (e.g. the relevant parts of the two spatial frameworks, or the LCWIP, if that is the case).	<i>Jan26 : wording updated.</i>

Appendix 2 Pre-Regulation Consultation Outcomes

Policy LL11: Active Travel	New developments should encourage the provision of conveniently located bus shelters, with seating and step-free access at boarding points. All major residential developments must incorporate or fund measures that improve local bus services, including but not limited to, route extensions, frequency enhancements, flexible bus services (Demand Responsive Transport) or community transport services, in support of the Central Bedfordshire Bus Service Improvement Plan (2024 or subsequent edition), and safe, accessible walking routes around the development providing opportunities for rest and enabling access to the bus network. '	Do the Town Council have any specific service improvements they would like to see come forward for the Plan area in general?	
Policy LL11: Active Travel (section D)		Section 7.6 of CBCs Design Guide covers public transport design principles. It is recommended that section D is reviewed in relation to what is set out in the Design Guide and that the Design Guide is referenced.	
Policy LL14: Energy Efficiency		Consideration as to whether EV charging should be referenced within this section. E.g., particular locations for public charging or residential areas requiring attention. Or if already covered within CBC initiatives, refer to these or the plans they are contained in.	
Glossary	Transport Strategy (LTP3/LTP4) Local Transport Plans setting priorities for sustainable mobility, active travel, and public transport.'	replace entry with 'Local Transport Plan (LTP)' and update text to say 'Strategic documents setting out...' Reference could then be made to the fact that LTP3 is the current document and that LTP4 is in development.	Noted.

Appendix 2 Pre-Regulation Consultation Outcomes

Materials/ construction	Use high-quality materials in paving, street furniture, and lighting to reflect the historic nature of the town, particularly along High Street and Lake Street...'	Sentiment is understood, but for noting, any infrastructure would need to be in accordance with CBC and government policy and within available budgets.	These entries are in the spatial plan documents produced by AECOM and may not be able to be edited.
Movement	Leighton Linlade's wider town centre should be a well-connected, walkable, and inclusive space, balancing the needs of pedestrians, cyclists, and vehicles while improving access to green spaces and enhancing the public realm'	Public transport doesn't feature here. Consideration from the Town Council as to whether this is of similar importance and whether it should be referenced here.	Public transport implied under the word vehicles, but could be made more explicit.
Trees and vegetation	Expand tree planting and urban greening, particularly along High Street, Lake Street, and Church Square, to improve air quality, provide shade, and enhance biodiversity;'	Sentiment is understood, but for noting, any infrastructure would need to be in accordance with CBC policy, including CBC's Highways tree policy.	
SUDs	Explore innovative ways to incorporate SUDs, whilst also enhancing biodiversity. Strategies could include the use of permeable paving to on street parking areas and public spaces, incorporation of rain gardens into public spaces, filter strips and bio-retention systems;'	Sentiment is understood, but for noting, scheme design would need to be in accordance with CBC and government policy. SUDs are covered within CBC's Design Guide.	
Figure 54 - Nodes and connections plan	NA	Are the features on the map, such as active travel connections, aspirations or existing? It would be useful to clarify on the key.	Review.
Design	Upgrade the surface of the High Street to indicate pedestrian priority with shared surface road.'	Sentiment is understood, but for noting, scheme design would need to be in accordance with CBC and government policy.	
Accessibility	Propose new pedestrian crossings to link the CBC aspirational travel route, existing footpaths and cycle routes and form a cohesive active travel network.'	Is the aspirational travel route mentioned the same as that shown in Figure 54 or something separate?	

Appendix 2 Pre-Regulation Consultation Outcomes

Infrastructure/improvements	NA	It is noted that the document sets out a number of aspirations for infrastructure. Whilst some of these are displayed on a map, it may be beneficial for clarity, to incorporate improvements into a table - acting as a quick reference to highlight all of the aspirational improvements. However this is purely a comment regarding presentation and not content.	
-----------------------------	----	--	--

Response from CBC Archaeologist

Topic	Specific Text	Regulation 14 Comments	LLNP Response.
Objective 3	<i>“celebrating local heritage through recognition of key buildings and locations, as well as the creation of dedicated space to display the history of the parish.”</i>	Once again, there is no mention of archaeology, therefore how will this be achieved if a key element of the local heritage is not considered? The settlement at Leighton has Saxon origins and at its core is a planned medieval town with an extant medieval Market Charter. Furthermore, the parish has a documented archaeological record that dates from the later prehistoric and Roman periods onwards. Celebrating local heritage should not be limited to above ground elements of the historic environment only. In our opinion, the absence of archaeology in this section as a whole weakens the vision, because it suggests a lack of interest in below ground heritage and does not accord with the principles of the NPPF or the adopted Central Bedfordshire Local Plan.	SG to consider additional supporting text to accommodate comments

Appendix 2 Pre-Regulation Consultation Outcomes

Policy LL1	– Key Principle A of this policy states “Development should celebrate and make the most of its special historic character, reusing old buildings and with heritage informing the design of new ones	Within the core of the town centre archaeological deposits have been recorded on previously developed land (for example, the former garage site in North Street where Saxo-Norman archaeology was recorded). It appears that the “brownfield first approach” has failed to recognise that archaeological deposits can and do survive truncation in urban areas. It is disappointing the opportunity to specifically include archaeology in this policy has not been taken. This does not accord with the principles of the NPPF or the adopted Central Bedfordshire Local Plan.	SG to consider additional supporting text to accommodate comments
Policy LL2	Key Principle D of this policy states “Proposals that prioritise heritage led placemaking, imaginatively reactivating historic spaces whilst preserving their heritage features through refurbishment (rather than demolition) will be supported”.	As noted in our comments on Policy LL1, within the core of the town centre archaeological deposits have been recorded on previously developed land, failing to recognise that archaeological deposits can and do survive truncation in urban areas and that archaeology has a role in informing placemaking is unfortunate. It is disappointing the opportunity to specifically include archaeology in this policy has not been taken. This does not accord with the principles of the NPPF or the adopted Central Bedfordshire Local Plan.	SG to consider additional supporting text to accommodate comments
Policy LL3	Key Principle F, iv of this policy states that all proposals should “ <i>respond to and enhance the heritage of the area, with careful consideration of local architectural styles and building forms, particularly the heritage of the canal in this area</i> ”.	There is also an opportunity here to promote the history of the canal, and its economic significance to the town and the wider area. As a point of note, the Archaeology Team would also consider it necessary that canalside development (where relevant) consider any potential impacts on below ground archaeological deposits, particularly where there may be palaeoenvironmental potential.	SG to consider adding to supporting text.

Appendix 2 Pre-Regulation Consultation Outcomes

Policy LL4	Key Principle A, iii of this policy states “New cycle parking, walking and cycling routes around the Heritage Focus Area, (located within the conservation area and the setting of the listed building cluster around St Barnabas Church,) which enable better access to the Station, St Barnabas Church and Linslade Recreation Ground will be supported where proposals are able to demonstrate how they have seek to preserve and celebrate local character and heritage in their design, layout, form and massing.”	Identifying the location of the Heritage Focus Area referred to in this policy is exceedingly difficult from the maps supplied in the plan. To prevent ambiguity, we advise that a clear and concise map is provided.	SG to consider addition of a separate map to show this area in the Plan.
Policy LL5		We are disappointed there is no heritage consideration in this policy. Given the missed opportunities in the past to adequately investigate the impact of redevelopment on any potential surviving archaeological remains within the core of the historic town (for example, Waterborne Walk), and the history of engagement by this Team (and our predecessors) in relation to this land, we advise this absence in reconsidered. Where small scale archaeological investigations have been undertaken on the land to the immediate rear of the High Street building line, archaeological deposits have been recorded.	
Policy LL7		amongst the list of community assets is the Tactic Centre, which is a Listed Building, it would be advisable to consider whether it is necessary where there are specific heritage (or other) designations to make reference to them in the policy/preamble or at least to the need to comply with other legislation for certain facilities.	SG to consider referencing in respect of this building in support text.

Appendix 2 Pre-Regulation Consultation Outcomes

Policy LL9		amongst the list of Green Spaces are some which include heritage features/archaeological remains (this includes sites such as Knolls Wood which borders two Scheduled Monuments and Linslade Woods where medieval wood banks survive). The presence of heritage features strengthens their importance, yet no consideration has been taken of them. In our opinion this is a missed opportunity which should be addressed.	JB to liaise with CBC officer to review heritage features for inclusion within the evidence base for this policy.
Policy LL12		– Item 3 of the list of additional infrastructure for the town is an “exhibition space to display Leighton Buzzard’s history”. We note this aspiration and hope that in the revised version of the plan, archaeology is also considered.	SG to consider updating supporting text.
Appendices A and B		– We note the absence of a consideration of archaeology in these documents, whilst we appreciate that they are purported to be spatial strategies, both documents claim to have analysed the areas in terms of heritage assets. Furthermore, they cite the results of the public engagement in which those who responded community considered the conservation of heritage to be “very important” and for Land South of the High Street, “celebrating” the heritage of the town is supposed to be a key theme.	

4. Conclusions & Recommendations

The representations are generally supportive of the LLNP and following a Steering Group review of policies LL5, LL6 and LL9, with a number of minor modifications to other policies and supporting text as set out in section 3, it is considered that it can proceed to the Regulation 15 submission stage without further formal consultation.

It is recommended however that further informal engagement takes place with the ICB in respect of the proposed neighbourhood health facility and with CBC in their role as landowner in respect of LL5 prior to finalising the Plan.

5. Next steps

The Steering Group will need to confirm if it is comfortable with the changes advocated by the consultees and discuss the three policies considered for full review at its next meeting on the 17th December prior to updating of the submission version of the LLNP.

Post meeting note –

At the meeting on the 17th December the following were agreed:

- Contact CBC Asset Team to arrange meeting to discuss LL5 Land South of High Street in January to establish a mutually agreeable position for policy wording.
- Contact NHS to facilitate meeting with the ICB in January in respect of healthcare facilities for the town.
- ONH to meet with Jon Balaam to review the evidence bases for the proposed LGS to response to the objections, adjust the mapping on the Van Dyke Recreation Ground site to ensure no overlap with CBC owned land and add 2 further LSG spaces which had been overlooked prior to the Regulation 14 at Parson's Close Recreation Ground and Linslade Recreation Ground (both owned by LLTC and consented for inclusion)
- SG/Officers to provide details to ONH of the CBC/TC working party on Land South of the High Street and proposals by Paul Brown to add to the evidence base.
- ONH to email CBC Neighbourhood Plan Officer to clarify engagement levels.
- Task Team/ONH to review Housing Needs Assessment to confirm policy wording for LL6 Housing Mix and Type.
- ONH to prepare first draft of Submission Plan taking account of the Regulation 14 comments where they are able to be accommodated, ready for review by the SG towards the end of January.

Once all amendments/updates have been made then ONH will update the Policies Map.

The Steering Group will then need to finalise their Consultation Statement.

Once the submission version of the LLNP Plan is ready, ONH will also prepare the Basic Conditions Statement. The Town Council will need to approve its submission version of the Plan to send to Central Bedfordshire Council for the Regulation 15 and 16 process.