



HOUGHTON REGIS NEIGHBOURHOOD PLAN

2020 - 2035

CONSULTATION STATEMENT MAY 2023 – **APPENDIX B**

Houghton Regis Neighbourhood Plan Consultation Statement Appendix B

Comments and responses to Regulation 14 (2023) consultation

Organisation/reference	Section	Comment	Alternative Approach	Missing ?	Response	Change to NP?
Harlington Parish Council		The Houghton Regis Neighbourhood Plan was considered. RESOLVED Clerk to inform Houghton Regis Council, Harlington train Station is closer to Houghton Regis town centre (5.6 miles) than Leighton Buzzard train station (11 miles).			Noted, change to para 16.5	Changes to 16.5
Historic England		No specific comments on this NP			Noted.	None
National Gas Transmission		Two gas pipelines fall within the Neighbourhood Area. Map provided. No specific Comments			Noted	None
National Grid Electricity Transmission		Two electricity transmission lines fall within the Neighbourhood Area. Map provided. No specific Comments			Noted	None
National Highways		In relation to the Houghton Regis Neighbourhood Plan Draft, our principal interest is in safeguarding the operation of the A5 and M1 in the area, which bounds the parish to the north and north-east. We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Houghton Regis Parish is required to be in general conformity with the strategic policies of the development plan which comprises of the Central Bedfordshire Local Plan 2015-2035 (adopted in July 2021), the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011 and the Neighbourhood Development Planning Regulations 2012. The Plan notes, no further land for residential development, employment / commercial purposes are anticipated as the two consented developments of Houghton Regis North 1 and 2	Henceforth, we have no further comments to provide and trust that the above is useful.		Noted	None

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		which have been granted in 2014 and 2015 will provide sufficient opportunities within the parish and will be undertaken in accordance with the outline permissions and Central Bedfordshire Local Plan. It is noted, National Highways is consulted on regular basis in relation to any potential changes to the schemes and the potential impact on the SRN in the area. We consider that the Houghton Regis Neighbourhood Plan is not expected to have any significant impacts on the operation of the SRN in the area due to the limited level of growth proposed across the parish (other than the schemes already discussed with National Highways) which is envisaged by the Neighbourhood Plan, it is considered that the policies set out within the document are unlikely to cause a severe impact on the operation or capacity of the SRN.				
Natural England		Natural England does not have any specific comments on this draft Regulation 14 for the Houghton Regis neighbourhood plan.			Noted	None
1	green areas.	We do not want more new builds.			Noted	None
2	open green spaces	Too many home and not enough infrastructure such as doctors? Schools, shops, entertainment venues. Too much prey on the main roads in and out of Houghton Regis especially near houghton hall where they have been repairing a gas main for over 6 weeks.	Better infrastructure plans concerning people's well being, More support for the hospital and services due to the bulging of all the extra housing around houghton regis	Not enough thought for future generations	Noted. Infrastructure needs to be provided alongside allocations in the CBC Local Plan. Policy I1 requires essential infrastructure alongside new development.	None

Organisati on/referen ce	Section	Comment	Alternative Approach	Missing ?	Response	Change to NP?
3	Parkin g	My concern are that too many people on this road park long wheel base vans on this road that take up the space of two cars. A large amount of people don't seem to park on these drives and also some households seem to have a large number of people living in the houses and this means a lot more cars on the street. I am disabled and find it hard to park in front of my house I do try to park on the drive but it is hard for me as my drive has slope. With the bad parking of others it sometimes find it hard to see when pulling out of the drive as there will be a van there and it doesn't seem to move for months.	Maybe if Leaffields had permits then this would help and people would then park on these drives, also this may stop all these large vans parking there if they had to pay. I would like a disabled box outside my house as this will help me and my daughter who is autistic. So permits or marked bays	A centre for young people as there don't seem to be much for them to do apart from hang around the shopping centre and Bedford Square is not the most attractive place to hang out	Noted, parking behaviour is not a land use matter and is outside the scope of the NP. The TC are aware that there are a lack of resources for young people's services but there is some youth provision and it is an issue that is being pursued.	None
5	Servic es	All these new services going in to support new houses, eg. Schools, but not the one thing we actually need most: another GP surgery. It's hard enough now without bringing in more people to the area. It's an absolute necessity!	None	Additional GP surgery, and better provision of looking after overhanging trees (not bushes and shrubs) in Estate pathways, eg. Parkside	Noted, Speeding behaviour and tree trimming are beyond the scope of the NP. The TC is not the provider of GP services and is aware of the lack of GP's. The local MP has raised the issue in the House of Commons recently.	None

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6	16.18	The new HRN1 houses by Barrett and Bellway have no sign of electric vehicle charging facilities. Is the requirement introduced too late for the development?	Install more charge points as council run for profit at locations which would benefit from users staying nearby such as The Homestead facility. Business wins and the council win.	yes Traffic calming on Sundon Rd. Both mini roundabouts at Hillsborough Crescent are lethal. very little speed limits are observed and kids will suffer as the volumes increase.	EVC points are now mandatory through building regulations but this development preceded this requirement. Policy TCP2 encourages the provision of more public EVC points. Speeding behaviour is beyond the scope of the NP policies, but Aspiration TCP2 seeks to improve road safety.	None
7	78.11	Sports and Leisure. Does not include indoor sporting activities. Neighbourhood Plan Aims: 2: to support, protect and enhance the social assets, community facilities and services to meet residents' needs. 10.4 : does not make sense with regards to improving residents quality of life The plan fails to acknowledge what the substantial growing population will have with regards to the lack of indoor sporting facilities. In other words, indoor football, basketball, roller hockey, hockey, gymnastics, indoor cricket, table tennis, badminton etc. Currently there is a managed 6-court sports hall on the Kingsland campus which is open 7 days a week from 9am to 10pm. In 2024 this sports hall will be closed and not replaced.	Build a 6-court sports hall on the site of the proposed new leisure centre.	New Indoor sporting facility from 2024 to cater for the growing population.	Agree, 12.4-12.7 describe the NP's approach to formal sports facilities, but this is not reflected in the Policy. Additional words added to Policy GSR2. Policy I1 requires essential infrastructure alongside new development. 'Formal sports facilities' will be added to the 5th bullet point. There is a new indoor sports hall.	Changes to GSR2 and I1

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8	Emplo yment and Diversi ty	No good jobs in the area, no diversity of people in the area	Let us know about the Bidwell west employment area and what opportunities there. This could also bring about different people to a run down area.		Noted	None
9	All	It's great			Noted	None
10	Section 12 . Open Spaces	I fully support the plan outlining protected open spaces in Houghton Regis, in particular Windsor Drive, which is an important green corridor that links communities in the town and is a well used and well regarded space for walking, exercise and mental wellbeing. As the town grows, and the community changes, it is important to provide additional spaces that reflect the nature of the densifying of Houghton Regis. We have lost the ability to walk five minutes in any direction and enter the countryside surrounding the town, so open spaces provide a measure of relief in the urban sprawl.	A focus on identifying sustainable development on brownfield sites or sites outside of the current town that can enhance the environment and in which protected open space is paramount. Allowing the protection of existing and proposed open spaces helps at least maintain a balance between the over development around the town and the health of the existing settlement.	A focus on identifying sustainable development on brownfield sites or sites outside of the current town that can enhance the environment and in which protected open space is paramount. Allowing the protection of existing and proposed open spaces helps at least maintain a balance between the over	Noted, NPPF paragraph 120 requires that planning policies and decisions should make the best use of land including giving substantial weight to the value of using brownfield land.	None

Organisati on/referen ce	Section	Comment	Alternative Approach	Missing ?	Response	Change to NP?
				development around the town and the health of the existing settlement.		
11	Section 12.9 Local Green Spaces	I am happy you acknowledge how vital these local green spaces are and how you state that development will not be supported on them. I am particularly covered about the green space at Windsor Drive so I am happy that you have stated you will not allow development on this green space.			Noted	None
12	Planning	Do not build on Windsor drive it's one of the last green spaces left for casual recreation use	There are enough builds going up	Saving green spaces	Noted	None
13i	12 Green Spaces - 14.7 Heritage - The Memorial 16 Parking	Developing and building on The Green (both the main Green and the smaller part of The Green opposite the main road. It is imperative The Green, which is common ground, should remain protected. It should be listed with the other green spaces. Development of The Green is non-negotiable. Houghton Hall, grade II listed and with its historical provenance must not be obstructed by buildings in front of it. The Green is the 'heart' of Houghton Regis, the jewel in the crown, where special events take place and have historically taken place when Houghton Regis was a village. The smaller part of The Green which is opposite the main Green on other side of the road also has historical significance being part of the original manor which used to stand behind it. Studying this plan, it is obvious CBC	We are no longer a semi rural area. Since the new development it feels really claustrophobic living here, there are people everywhere and it feels too busy which is not good for our wellbeing. It is important we RETAIN ALL OUR EXISTING GREEN SPACES including Windsor Drive Recreational Ground. The Green with its historical importance should be classified as a conservation area which can never be developed and built	Before the Pandemic you conducted a survey in the Town Crier where local people stated their needs/ambitions for Houghton Regis. The results of the survey were more	Noted. The Green is protected and does not need to be allocated as a Local Green Space. There is no space for allotments in the original town.	None

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
		<p>and the developers have made a decision to relocate The Green to a piece of grass on the new Linmear development adjacent to a proposed hotel. Linmear is not the heart of Houghton Regis and never will be. It is on the outskirts of Houghton Regis. By stating you 'will support the removal of The Green if it can be proved it will be more beneficial in a different place, you are playing into the hands of the developers and CBC.</p>	<p>on perhaps becoming part of Houghton Hall Park. This should apply to all parts of The Green including the smaller section on the opposite side of the main road.</p>	<p>football pitches, a cemetery and allotments. Only the football pitches have begun to be addressed. We desperately need a cemetery in Houghton Regis not in the new development in Bidwell, Thorn or Linmere on the outskirts but in the existing part of the town. It needs to be a priority and it needs to happen now. We also need allotments, not in the areas of Bidwell, Thorn or Linmere</p>		

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
				but in the original town.		
13ii		<p>In addition, the Memorial Hall has historical significance. The plan to develop The Green includes the development of the Memorial Hall. Although this is a post war building it has significant historical value. During World War 2 the villagers worked hard to raise money to build the Memorial Hall by having concerts in the wooden building which stood on the site. The Memorial Hall is built in memory of those who had died in both wars. To demolish it would be an insult to the memory of those villagers. Today the Memorial Hall is an important community hub and entertainment centre for the people of Houghton Regis.</p>	<p>Make the Memorial Hall a listed building.</p>		<p>The TC is a trustee of the Memorial Hall therefore it is protected. Listing of a building is decided by Historic England.</p>	<p>None</p>

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13iii	16 Parking	16 Parking - Until the introduction of limited waiting time on the Peel Street car park it was difficult to find any parking space in the centre of Houghton Regis. I am concerned the existing car parks will be developed eg building flats on the Peel Street car park.	State a commitment to keeping the existing car parks.		There are no current plans to build on the Peel Street car park.	None
27	Growth Areas - Page 28 / Paragraph 11.4	Health centre has just been cancelled for lack of funds. Before all these houses were built - health provision should have been there. I am a member of the PPG at Peal st and when I first joined before these houses were built we were short of doctors - yet we still went ahead with all these places and there are more still to come behind our houses.			The TC is not the provider of GP services and is aware of the lack of GP's. The local MP has recently raised the issue in the House of Commons.	None
28	Sustainable Building - Page 33 / Para 11.17	Why aren't builders putting solar panels on ALL NEW HOUSES or at least those facing the right way? It must be cheaper to do it as they build rather than add it afterwards. The government gave us solar panels under their scheme and we notice the difference every time the sun shines. It should be MANDATORY for all new buildings.			Policy H2 encourages the use of renewable energy installations, however, it can only become mandatory through building regulations.	None
29	8. / 8.4	If 60% think we have adequate housing so why overload. Heritage 8.12 75% said its IMPORTANT we preserve our town heritage, the proposed plan for the town centre fails to acknowledge the importance and heritage of the following buildings The Crown, Tavistock Place, reference to when the village belonged to Woburn estates, Park cottages formerly the old coach house for the original Houghton Hall.	Stop building - we have enough housing for the next 20 years at least. If you do build make sure you include bungalows (the housing being built is too tall and too dense) Heritage - List the following buildings (Grade 2 preservation) The Crown, Tavistock Place, Park Cottages (former lodge to the original Houghton Hall) Curls - the old	The importance of the buildings (above) The Memorial Hall, villagers collected money, by having wartime / post war concerts to build this hall in	The NP does not allocate housing, that is the job of CBCs Local Plan. The TC is a trustee of the Memorial Hall therefore it is protected. Listing of a building is decided by Historic England and is not within the power of the NP.	None

Organisati on/referen ce	Section	Comment	Alternative Approach	Missing ?	Response	Change to NP?
			chapel, Dove Hollow (*hard to read), East Farm (house) Vane Cottage High Street - Wilson's Car Sales List as an important building The Memorial Hall	memory of those villagers who died in the wars. It is an insult to their memory and hard work that this is not included.		
30		I am giving up, as previously people have asked for Bungalows. What was built, Flats. This is just a tick box. The Council have already made their minds up!	The countryside destroyed I am getting more annoyed Climate Change houses built on Flood Plain Wildlife destroyed	Council Nigel saying its not a pretty field, better looking than him	Comment noted	None
31		Page 5 – 25 Improved quality of life and biodiversity are not compatible with excessive development. There has been far too much development already. CBC are forcing too much development into Houghton Regis area			Houghton Regis has been subject to large scale development over the years.	None
31		Page 8 For decades Houghton Regis and Dunstable have needed a north to south bypass. The east west bypass along with the woodside link have just been a waste of countryside and become a race track evenings and weekends for 'boy racer' idiots. Improve north to south traffic routes, speed cameras, humps and pedestrian lights and crossings. Speed restrictions applied and enforced.			Speeding behaviour is beyond the scope of the NP policies, but Aspiration TCP2 seeks to improve road safety.	None
31		Page 15 The four objectives have failed miserably and current proposals will only make things worse.			Comment noted	None

Organisation/reference	Section	Comment	Alternative Approach	Missing ?	Response	Change to NP?
31		Page 16 The plan aims are not compatible with development on such a large scale			Houghton Regis has been subject to large scale development over the years. The NP cannot prevent new housing development which CBC may allocate through the Local Plan.	
31		Page 25 Public parking in the harvest home car park has been stopped			Noted	None
31		Page 11 North south by pass, halt further development resulting in loss of countryside and green spaces.			Comment noted	None
31		Page 12 Leave land adjacent to Houghton Park Road as green space area			This area does not qualify for Local Green Space status	None
31		Page 13 Action to curb crime and vandalism 'travellers' activities, car drivers racing on evenings and weekends, motor bikers running across parks and on footpaths			Behaviours as described cannot be controlled through the NP policies	None
31		Page 27 – 34 More Bungalows would release houses for families			Comment noted	None
31		Page 28. Will additional health centre be restored and staffed. What about GP surgeries.			The TC is not the provider of GP services and is aware of the lack of GP's. The local MP has recently raised the issue in the House of Commons.	None
31		Page 29. New residents are using existing facilities which are already overstretched, and adding more problems.			Noted, Policy I1 seeks to ensure infrastructure is provided alongside new development	None

Organisati on/referen ce	Section	Comment	Alternative Approach	Missing ?	Response	Change to NP?
31		Page 30. Discounts enable landlords to buy and then rent out. Buy to let has caused many problems in Houghton Regis			Tenure is not an issue being dealt with through this NP, the Local Plan is referenced in Policy H1	None
31		Page 32. Problems regarding water catchment have already been ignored, are now causing issues. Nothing to stop proposed building on water catchment and drainage areas			Agreed, Policy BNF1 seeks to acknowledge this issue	None
31		Page 28/29 Surely health and other facilities should be in place before additional housing			Noted, Policy I1 seeks to ensure infrastructure is provided alongside new development, but the timing of such is up to the providers	None
31		Page 30. Bungalows would release houses for families. Retirement 'apartments' are not suitable for many elderly people			Comment noted	None
31		Page 31. Unacceptable loss of open space is exactly what is happening. Nothing to stop further building on green space and countryside			Comment noted	None
31		Pages 35 45 51 The police station in sundon road needs to be active and operational			It is currently being used by the police. There are still policing issues that the TC are aware of.	None
31		Page 35. 36/37 Recent development has resulted in reckless and dangerous driving evenings and weekends. The new by-pass and woodside link are used as a race track and are attracting hooligan drivers to meet up from miles around. Motor bikes, quad bikes, electric scooters and even cars are regularly driven on paths and parkland			Behaviours as described cannot be controlled through the NP policies	None

Organisati on/referen ce	Section	Comment	Alternative Approach	Missing ?	Response	Change to NP?
31		Page 35. The layout of parkside, houghton park and surrounding areas favour and encourage, holliganism, crime, vandalism and dumping of rubbish			Behaviours as described cannot be controlled through the NP policies	None
31		Page 35. prompt actions against so called 'travellers' who regularly dump rubbish and fly tip			Behaviours as described cannot be controlled through the NP policies	None
31		Page 36. 37/38. 41-51The land east of and adjacent to Houghton Park Road must be kept as open green space and not for deveopment. Also has important nature issues.			This area does not qualify for Local Green Space status	None
31		Page 39/41 Prevention of infill of existing open spaces of any size			GSR1 seeks to retain small open spaces used for recreation/pla y	None
31		Page 58-62Less takeaways and more restaurants			Noted, however, restaurants and cafes are particularly vulnerable to viaility issues	None
31		Page 58. Why are exisiting schools / colleges being done away with and new ones being built. These are not additional as in new areas.			Necessary upgrades to education facilities are ongoing	None
31		Page 59. No point building hotels as existing ones are being used for illegal immigrants and will be the same, new warehouses like 'Liddl' far to big and a blot on the landscape.			Comment noted	None
31		Page 60. Extensions and change of use in residential areas is dragging down housing areas, there are car repairs, landscape gardeners an other companies causing problems with parking, part repaired and broken down vehicles. Also 'customers' visiting and delivery vehicles in addition to transporters and trailers, all should be stopped.			Behaviours as described cannot be controlled through the NP policies	None

Organisati on/referen ce	Section	Comment	Alternative Approach	Missing ?	Response	Change to NP?
31		Page 60. Small business premises made available and stop working companies blighting residential areas. Unsuitable buildings in gardens detract from residential areas.			Comment noted	None
31		Page 62. Since existing roads and pathways are not being maintained, why build new ones.			Comment noted, however, new links are important.	None
31		Page 63-65. North to south by-pass is needed. New northern is east to west			Comment noted but there are no plans for a new by pass	None
31		Page 63. Both Houghton Regis and Dunstable were linked to national railway system and accessed midland mainline and Thameslink, even a link to Leighton Buzzard and West Coast Mainline. All done away with by planners and politicians, restore bus way to railway. Page 63. Restore Bus-way to railway. Have a new 'Leagrave North' railway station. A railhead depot on midland mainline might help cut down on lorry movements.			Comment noted, there are no plans to restore the railway in Houghton Regis	None
31		Page 64. 'Z' Bus route should run through to Luton airport. No bus route between Houghton Regis and Leagrave so no public transport access to Leagrave station			Direct public transport to Leagrave would be welcomed	None
31		Page 66 -67/68. Water run off and flooding is being made worse.			Comment noted	None
31		Page 64. No provision to stop footpath and cycle ways being used by motorbikes and quad bikes and electric scooters are already proving dangerous nuisance on existing paths.			Behaviours as described cannot be controlled through the NP policies	None
31		Page 65 - 67. All new homes or flats should have at least one parking space or spare for each household company vehicles and vans are making residential parking worse.			Noted, parking spaces are provided to CBC standards, The vehicles which may be parked are not within the	None

Organisati on/referen ce	Section	Comment	Alternative Approach	Missing ?	Response	Change to NP?
					control of the Np policies.	
31		Page 69 - 76New facilities and infrastructure before building			Noted, Policy I1 seeks to ensure infrastructure is provided alongside new development, but the timing of such is up to the providers	None
31		Page 69 - 70. Medical facilities e.g. GP surgeries must be provided. Existing facilities are already overwhelmed.			The TC is not the provider of GP services and is aware of the lack of GP's. The local MP has recently raised the issue in the House of Commons.	None
31		Page 71. Development already taken place on flood risk areas and water sources contaminated. the plan is allowing more of the same.			The NP cannot prevent development in general terms. Flood risk is taken into account at planning application stage.	None
31		Page 73. Stop developing on green space adjacent to windsor drive			Windsor Drive Recreation Ground is a Local Green Space	None
31		Page 74. Stop development on land adjacent to and east of Houghton Park Road and 're-wild' for biodiversity and recreation.			This area does not qualify for Local Green Space status	None

Organisation/reference	Section	Comment	Alternative Approach	Missing ?	Response	Change to NP?
31		Page 76. To be able to veto or block and inappropriate developments being imposed on Houghton Regis by CBC			The NP cannot prevent new housing development which CBC may allocate through the Local Plan.	None
31		Page 76. No account being taken of commercial vehicles, vans and even lorries being brought home. Lack of enforcement against all detrimental aspects.			This may be a matter for the police if such vehicles are causing obstructions	None
Responses from French's Avenue Promotor						
15	Policy H1 - Affordable Housing (page 30)	Policy H1 of the NP states that new residential development must provide a quantity of affordable housing in accordance with the requirement of the Local Plan to meet affordable housing needs. It is inconsistent to contain an affordable housing policy for new developments when the NP does not contain any allocations or a policy that encourages any new housing. The intention of Policy H1 to deliver more affordable housing will be undermined without the policy support to first promote housing delivery.	A policy should be provided in the NP to promote new housing development, and suitable sites should be allocated indicating where this growth can be directed. All previous iterations of the NP contained a 'New Housing' policy guiding new development. The policy was included notwithstanding the housing to be delivered through the Houghton Regis North 1 and 2 projects. As the situation has not changed, there is no reason why this policy has now been removed. Including a housing policy and housing site allocations in	A policy supporting new housing development and housing site allocations.	There is no requirement for the NP to allocate sites for housing.	None

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
			<p>the NP, including our client's site off Frenchs Avenue, would make the NP in general conformity with the strategic policies of the Local Plan and paragraph 60 of the NPPF.</p>			

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
16	Infill Develop ment and Redev elopm ent (page 31)	Paragraph 11.13 is the only paragraph in the NP addressing redevelopment. The text is vague and ambiguous, stating that there 'may be' sites that 'could be' developed. Paragraph 041 of the PPG (Reference ID: 41-041-20140306) confirms that Neighbourhood Plans must contain clear, concise, unambiguous policies to aid in the decision-making progress. As drafted, the NP does not provide any support for housing applications and does not offer any strategic direction. This conflicts with the strategic policies of the Local Plan, and in turn fails to meet the basic conditions.	A policy should be provided in the NP to promote new housing development, and suitable sites should be allocated indicating where this growth can be directed. All previous iterations of the NP contained a 'New Housing' policy guiding new development. The policy was included notwithstanding the housing to be delivered through the Houghton Regis North 1 and 2 projects. As the situation has not changed, there is no reason why this policy has now been removed. Including a housing policy and housing site allocations in the NP, including our client's site off Frenchs Avenue, would make the NP in general conformity with the strategic policies of the Local Plan and paragraph 60 of the NPPF.	A housing policy and housing site allocations.	There is no requirement for the NP to allocate sites for housing.	None

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
17	Policy H2 - Sustai nable Develo pment (page 34)	It is inconsistent to include a policy setting out sustainable design standards for new development, without having a policy encouraging new housing delivery.	A policy should be provided in the NP to promote new housing development, and suitable sites should be allocated indicating where this growth can be directed. All previous iterations of the NP contained a 'New Housing' policy guiding new development. The policy was included notwithstanding the housing to be delivered through the Houghton Regis North 1 and 2 projects. As the situation has not changed, there is no reason why this policy has now been removed. Including a housing policy and housing site allocations in the NP, including our client's site off Frenchs Avenue, would make the NP in general conformity with the strategic policies of the Local Plan and paragraph 60 of the NPPF.	A housing policy and housing site allocations	There is no requirement for the NP to allocate sites for housing.	None
18	Safety and Securit y (page 35, paragr aph 11.21)	Paragraph 11.21 refers to 'Secured by Design' standards, and states that new developments, including housing, will be expected to take this guidance into consideration. This is another example of how the NP is inconsistent; specifying various direction for new housing development, without in the first instance providing the necessary strategic policy to promote this housing to come forward.	A policy should be provided in the NP to promote new housing development, and suitable sites should be allocated indicating where this growth can be directed. All previous iterations of the NP contained a 'New Housing'	A housing policy and housing site allocations	There is no requirement for the NP to allocate sites for housing.	None

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
			<p>policy guiding new development. The policy was included notwithstanding the housing to be delivered through the Houghton Regis North 1 and 2 projects. As the situation has not changed, there is no reason why this policy has now been removed. Including a housing policy and housing site allocations in the NP, including our client's site off Frenchs Avenue, would make the NP in general conformity with the strategic policies of the Local Plan and paragraph 60 of the NPPF.</p>			
19	Local Green Spaces (42-43)	<p>The Local Green Space Assessment Report recently carried out by Bedfordshire Rural Communities Charity has designated nine Local Green Spaces. These spaces accord with the criteria set out in paragraph 100 of the NPPF, being considered to hold particular importance to the local community because of its beauty, recreational value, tranquillity and richness of wildlife, and local character. Our client's site off Frenchs Avenue was not designated as a Local Green Space as it was not considered to hold any of these values. This independent assessment further highlights the appropriateness of development on the site.</p>			The lack of designation of a site as LGS does not indicate it's suitability as a development site.	None

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
20	Policy BE1 - Emplo yment (page 61)	The supporting text for this policy stipulates that the proposed outline commercial developments within Houghton Regis North 1 and 2 will provide 'sufficient scope for employment' and, therefore, the Plan does not allocate further land for employment/commercial development. As is the case for housing, the NP does not state what the local employment need currently is nor what this is expected to be for the NP period. It also does not specify how much employment/commercial floorspace the Houghton Regis North development is expected to provide. Notwithstanding, this, and the recognition that the Houghton Regis North development will meet expected needs, the NP contains a policy and an aspiration which encourages the development of employment development. This approach to managing commercial land uses in the Plan should also be reflected in the approach to housing development.	A policy should be provided in the NP to promote new housing development, and suitable sites should be allocated indicating where this growth can be directed. All previous iterations of the NP contained a 'New Housing' policy guiding new development. The policy was included notwithstanding the housing to be delivered through the Houghton Regis North 1 and 2 projects. As the situation has not changed, there is no reason why this policy has now been removed. Including a housing policy and housing site allocations in the NP, including our client's site off Frenchs Avenue, would make the NP in general conformity with the strategic policies of the Local Plan and paragraph 60 of the NPPF.	A housing policy and housing site allocations	There is no requirement for the NP to allocate sites for housing.	None

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
21	Sectio n 10 - Town Centre s and Local Centre s	The Local Plan sets out the Council's Spatial Strategy Approach. The Local Plan seeks to achieve seven strategic goals; point 4 reads as follows: Maximise potential opportunities for the intensification and redevelopment and the regeneration of urban areas (... Houghton Regis ...) through town centre frameworks and masterplans. Section 13 (Retail and Town Centres) of the Local Plan expands on this strategic aim. Paragraph 13.1.3 notes that:... it is considered that an appropriate strategy for Central Bedfordshire would be to first improve its retail offer by focussing on improving the vitality and viability of these existing town centres in the short and medium term and then increasing the comparison retail need in Central Bedfordshire at the end of the plan period in line with the projected increases in population as identified in Table 13.2. This could be achieved by making the existing floorspace in the town centres work hard to attract visitors through the intensification of uses in the town centres and implementing the objectives of the town centre	Draft Policies TC1, TC2, TC3, TC4 and TC5, Map 2 and the relevant designations on the draft Policies Map on page 75 should be deleted.		Comments noted. However, policies TC1-TC5 and the associated map and text give additional detail to the Local Plan policy and are in general conformity with the strategic policies of the Local Plan.	None

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
		<p>masterplans and frameworks. Paragraph 13.1.5 of the Local Plan acknowledges that leisure uses should be working together with retail to support the vitality and viability of town centres through generating local employment opportunities and creating more attractive, diverse and healthy places catering for a range of specialist and brand retail that encourages footfall to these centres. The paragraph also notes that there has been an increase in the leisure offers within the town centres, and that this is considered positive as these uses increase dwell times in the town centres thus improving the vitality and viability of them. Houghton Regis is identified by the Local Plan as a Secondary Town Centre (Table 13.1) and its boundary is defined on the Policies Map adopted. Paragraph 13.1.7 confirms that the purpose of the town centre boundaries is to maximise the vibrancy of town centres by ensuring that a high concentration of main town centre uses; particularly retail and leisure uses; are focused within the designated areas. Paragraph 13.2.1 notes that</p>				

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
		<p>the approach of requiring new main town centre uses to be delivered in town centre locations first will be adhered to. The Local Plan goes on to set out the mechanism by which proposals for main town centre uses, but which are outside the town centre, will be assessed:Where that is not feasible, sites on the edge of town centres should then be considered, followed by out of centre locations. Local Plan Policy R1 reflects the strategic aim of concentrating appropriate development within the defined town centres. The Policy notes that:Within the identified Town Centre Boundaries, but outside the Primary Shopping Areas, of the Principal and Secondary Town Centres, development proposals for other main town centre uses such as leisure, commercial, office, tourism, cultural, and community uses will be supported. The Sequential Test will be applied to proposals for retail uses that are outside the Primary Shopping Area and for retail and other main town centre uses that are not within a designated town centre boundary. Development proposals that fail</p>				

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
		<p>the Sequential Test will not be supported. Neighbourhood Plans (NP) can include site allocations and policies. The Government has set out guidance on the process to follow when allocating sites and how policies should be created. In addition, the Local Plan sets out advice on the scope and content of Neighbourhood Plans. In respect of allocations, paragraph 6.8.4 notes:When proposing allocations, a robust assessment of all alternative sites available will be required to show that the most sustainable locations have been selected. The status of allocations made through the Neighbourhood Planning process is in effect, the same as if made by the Council through a site allocations Development Plan Document because Neighbourhood Plans become part of the formal Development Plan for Central Bedfordshire upon adoption. In respect of policies, the Government’s National Planning Practice Guidance (NPPG) notes that neighbourhood plans must be in general conformity with the strategic policies of the Development Plan in force. In</p>				

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
		<p>addition, the NPPG notes that policies must be clear and unambiguous, capable of being applied with consistency and confidence, concise, precise, supported by appropriate evidence and distinct, reflecting the specific neighbourhood to which they relate. Paragraph 10.14 of the draft NP notes that the Town Centre Boundary has been designated in the recently adopted Local Plan. However, the NP goes on to identify “three additional areas immediately adjacent to the Town Centre Boundary” which are shown on Map 2. The NP then sets out four draft policies:• TC1: Town Centre• TC2: High Street West• TC3: High Street North• TC4: All Saints ViewEach draft policy includes text on land uses, while draft Policy TC2 includes provisions on design, pedestrian links and permeability. Given that the Town Centre is given its own boundary and policy, it is not clear what the three other areas are intended to be. Are they designations equivalent to a Town Centre? Are they intended to be equivalent to Site Allocations? Are they policies but ones which are intended only to be applied in specific areas?It is assumed that the three additional areas are not intended to be treated as part of, and on a par with, the defined Town Centre as the draft NP includes a policy (TC1) that is specific to the Town Centre. The three areas cannot be site allocations because there is no evidence that they have gone through the process required when allocating a site; in addition, they each cover a relatively large area. However, if they are to be read as policies, they fail the test of “general conformity” and run counter to the Government’s NPPG guidance. Regarding their general conformity, as set out above, the Local Plan has made the strategy</p>				

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
		<p>on town centres very clear; development appropriate to town centres should be concentrated within the defined boundaries. By expanding the area in which main town centres uses are deemed to be appropriate, the proposed areas try to do the exact opposite. The Local Plan includes reference to the sequential test which provides the long-established mechanism for dealing with proposals for town centre uses outside the designated area. How Policies TC2 – 4 would relate to the sequential test is unclear. The policies are also unnecessary. Development of town centre uses in these three locations would be appropriate if the sequential test is met. The sequential test supports the Council’s town centre strategy, Policies TC2 – 4 may well undermine it. It is also not clear why one edge of centre area is judged to be more suitable for certain main town centre uses than others. The policies and need for areas in additional to the Town Centre, where town centre uses are encouraged is not evidence based, given the sequential test the policies cannot be applied consistently and with confidence and they are not, therefore, clear and unambiguous. In respect of Policy TC2, it is not clear what is meant by, “Development proposals shall have sympathetic regard to the existing built form of the High Street and Houghton Road frontages”. The buildings fronting these roads range from a very large supermarket and large office to terraced and detached dwellings. Some frontages are blank, others are “animated”. Some buildings are situated at the back edge of the pavement while others are set well back. In addition, the words “sympathetic regard” are unclear. Given the design policies in the Local Plan, this section of the policy</p>				

Organisation/reference	Section	Comment	Alternative Approach	Missing ?	Response	Change to NP?
		<p>is also unnecessary. The Local Plan's Spatial Strategy Approach (point 4) confirms that the Local Plan seeks to: Maximise potential opportunities for the intensification and redevelopment and the regeneration of urban areas (... Houghton Regis ...) through town centre frameworks or masterplans.</p>				
22	Policy TCP2: Parking (page 68)	<p>Policy TCP2 (Parking) requires new housing development to provide parking in line with CBC's parking standards and that development has adequate on-site parking to meet current and future needs. It is inconsistent to include this policy without first including a policy which promotes new housing development.</p>	<p>A policy should be provided in the NP to promote new housing development, and suitable sites should be allocated indicating where this growth can be directed. All previous iterations of the NP contained a 'New Housing' policy guiding new development. The policy was included notwithstanding the housing to be delivered through the Houghton Regis North 1 and 2 projects. As the situation has not changed, there is no reason why this policy has now been removed. Including a housing policy and housing site allocations in the NP, including our client's site off Frenchs Avenue,</p>		<p>There is no requirement for the NP to allocate sites for housing.</p>	None

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
			<p>would make the NP in general conformity with the strategic policies of the Local Plan and paragraph 60 of the NPPF.</p>			
23	Annex 3: Table of Aims and Policies (page 77)	<p>Neighbourhood Plan aim number 4 is: 'To respond to housing needs by supporting suitable housing for people of all ages and means.' The table states that Policy H1 (Affordable Housing) and Aspiration H1 (Integration of Communities) will facilitate the achievement of this aim. This is not correct, because Policy H1 does not encourage any new housing development to come forward. It simply supports the delivery of affordable housing mixes and tenures. The Plan must include a mechanism to promote the delivery of new homes, and this in turn would then contribute to achieving this NP aim.</p>	<p>The Plan must include a mechanism to promote the delivery of new homes, and this in turn would then contribute to achieving this NP aim.</p>	<p>A housing policy and housing site allocations</p>	<p>There is no requirement for the NP to allocate sites for housing.</p>	<p>none</p>

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
24	Policy TCP2: Parkin g, page 68	<p>The first paragraph of Local Plan Policy T3 (Parking) reads as follows: Developers of new residential, commercial and other trip generating developments, must have regard to the car parking standards set out in the Central Bedfordshire Council’s Design Guide and Parking Strategy. The first paragraph of draft NP Policy TCP2 (Parking) reads as follows: Proposals for new housing and commercial developments will provide parking in line with CBC’s parking standards and have adequate on-site parking to meet current and future needs, unless alternative and accessible car parking arrangements can be made which do not add to on-street congestion. As currently drafted, the policy does not meet the Government’s tests. The phrase “in line with” is not clear and unambiguous, precise or capable of being applied consistently and with confidence. Does “in line with” mean “in accordance with”, or along the lines but not precisely as set out in the guidance, or something else? Having referred to CBC’s parking standards, the draft policy then sets out additional criteria beyond those standards to require developments to have “adequate on-site parking to meet current and future needs ... “. This text is not considered to meet the relevant Government tests. The requirement to go beyond CBC’s guidance is not supported by appropriate evidence. What is “adequate” and what is meant by the requirement to meet “future needs” is not clear, unambiguous and precise. It is not clear what would happen if a development was “in line with” the CBC parking guidance but was then judged – against as yet undefined criteria – not to have adequate on-site parking. The provision of additional parking to meet the</p>	The first paragraph of draft Policy TCP2 should be deleted.		Noted, 'line' substituted with 'accordance'. The additional wording does not go beyond CBC's parking standards.	Change to Policy TCP2

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
		second requirement could put the scheme at odds with the first requirement and vice versa. This draft policy could not, therefore, be applied with consistency and confidence. In addition, the policy offers nothing that is distinct.				
25	Sectio n 11. Housin g and Develo pment (parag raphs 11.3 - 11.7)	Paragraph 11.3 states that the specialist and older persons housing need for residents is provided across existing developments in Houghton Regis. The Neighbourhood Plan (NP) however does not define what this need figure is, nor how many spaces are provided within the listed developments. Specialist and older person housing need will inevitably increase throughout the Plan Period and so the NP should include a housing policy aimed at increasing delivery of suitable homes. Surprisingly, the NP does not contain a policy aimed at encouraging housing delivery, nor does the Plan contain any site allocations where future growth should be directed. Paragraph 11.7 states the expected housing supply figure for Houghton Regis to be over 15,000 by 2031, which will 'more than cover local housing needs'. This figure has been derived predominantly from the estimated housing densities from the Houghton Regis North 1 and 2 outline development consents. Being outline consents, the quantum of delivered housing may well change from that originally	Our client's site located off Frenchs Avenue is considered suitable for housing development and should be allocated within the NP. Houghton Regis Town Council had previously allocated the site in the Version 14 draft plan that was approved in January 2019. The site has historically been assessed as suitable for housing development, removing the site from the Green Belt. This is set out below for reference. The site was originally identified as being suitable for housing development by the former South Bedfordshire District Council in their draft Local	A housing policy and housing site allocations.	There is no requirement for the NP to allocate sites for housing.	None

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
		<p>estimated. Furthermore, this provision is not exclusive to Houghton Regis, as the consents extend beyond the Parish boundaries. Subsequently, the anticipated housing delivery figures cannot be relied upon to state that local housing need will be 'more than covered'. It is unsound for a Neighbourhood Plan to arrive at this conclusion, without identifying what this need figure is to begin with. Furthermore, this draft of the NP has increased the anticipated housing supply figure from 14,000 (see NP Version 14) to 15,000, though no explanation is provided to justify the supposed increase. As a consequence of the assertion that housing need will be 'more than covered', the NP does not contain any housing site allocations, or a policy encouraging any additional housing growth. This approach does not accord with the strategic policies of the Central Bedfordshire Local Plan (the LP), which encourage the delivery of new housing to accommodate the need for Central Bedfordshire as well as neighbouring Housing Market Areas, including Luton. The housing need figure within the LP (39,350) is not calculated using the Standard Method approach, and, as acknowledged in the LP (at paragraph 1.4.1), this need figure is likely to increase very significantly when the Local Plan Review is undertaken later this year. This means that additional housing sites will need to be identified to accommodate the increased housing requirement. In addition, Central Bedfordshire Council (CBC) does not have a five year housing land supply (5YHLS). CBC's 5YHLS was scrutinised in detail at an appeal in August 2022 in respect of a site in Stotfold (Appeal Ref : APP/P0240/W/21/3289401). The Inspector concluded that CBC cannot demonstrate a five year</p>	<p>Plan 1991. It was proposed to be allocated for 490 homes. In 2003, the site was recommended for early development (before 2016) by Roger Tym and Partners in their Luton/Dunstable/Houghton Regis Growth Area Study. The site was then included within a wider area of land identified for Green Belt Review in March 2005. More recently, the site was designated as ALP 164 by Central Bedfordshire through their Calls for Sites exercise. Subsequently, the site was appropriately allocated for housing within Version 14 of the NP. This draft was unanimously approved by the Town Council in January 2019. We note that the Town Council's approval of that version of the Plan was unanimous and that no concerns were expressed about the site's allocation. The site is surrounded by previously developed land on the northern, eastern, and southern boundaries. This developed land</p>			

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
		<p>supply of housing land. The Inspector, therefore, found that the most important policies of the Local Plan were deemed to be out of date by virtue of paragraph 11d of the of the National Planning Policy Framework (NPPF), and the ‘tilted balance’ engaged. It is imperative, therefore that CBC identify additional housing sites in the short term to ensure that there is a five year housing land supply. The omission of a housing policy and allocations in the NP conflicts with paragraph 60 of the NPPF which is explicit in its objective to significantly boost the supply of housing. The NP should contain site allocations to help meet Central Bedfordshire’s housing need, and this would furthermore accord with the requirements of paragraph 14 of the NPPF. In summary, it is acknowledged that the adopted LP under estimates housing need, in any case, CBC cannot demonstrate a 5YHLS so there is a clear strategic need to identify more housing sites. Therefore, the NP undermines, and is not in general conformity with the strategic policies of the Development Plan, as it promotes less development than that set out in the Local Plan. This conflicts with the requirement set out in paragraph 29 and footnote 18 of the NPPF. Therefore, the current draft NP does not meet the basic conditions of a Neighbourhood Plan, as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended).</p>	<p>surrounding the site comprises commercial, residential, recreational, and previously, education uses. This was highlighted in the Version 14 Plan, per Policy 19 which states ‘this part of the parish borders the built-up area of the adjoining town of Dunstable. To create a clear distinction between the open character and setting of both Maiden Bower and Sewell, a site off French’s Avenue is shown for development, identified as ALP164 in CBC’s call for sites..’ As agreed by the Council, development on the site would not cause undue loss of open space because it is largely surrounded by existing development. The site should, therefore, be removed from the Green Belt and re-instated as a housing allocation which would allow the NP to conform with the strategic policies of the Local Plan and paragraph 60 of the NPPF.</p>			

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
26	Sectio n 17 - Infrast ructur e Provisi on	<p>At present, CBC do not have a Community Infrastructure Levy (CIL) in place and, according to their website, “currently have no plans to introduce” one. Draft NP paragraph 17.3 notes that “CBC does not currently have a CIL charge in place”. Therefore, for the foreseeable future, obligations via s106 agreements is the only source of funding arising from developments for infrastructure. The remainder of this Section and Policy I1 must be read in this context. Draft NP paragraph 17.2 makes reference to the “strict regulations controlling the circumstances in which such contributions [planning obligations] can be sought and spent”. However, paragraph 17.5 states that developers are encouraged to engage with the Town Council at pre-application stage to ensure that where appropriate and viable, “facilities are in line with local priorities”. The Government’s National Planning Practice Guidance (NPPG) confirms that planning obligations assist in mitigating the impact of unacceptable development in order to make it acceptable. Obligations are statutorily required to be:</p> <ul style="list-style-type: none"> • Necessary to make the development acceptable in planning terms; • Directly related to the development; and • Fairly and reasonably related in scale and kind to the development. <p>The NPPG confirms that policy requirements for obligations arising from developments should be clear so that they can be accurately priced into the viability of proposed schemes. Plans should be informed by evidence of infrastructure needs and assessment of viability. Plans should set out policies for contributions expected from development to enable fair and open testing of the policies at</p>	Draft Policy I1 should be amended to make reference to the three statutory tests. The bullet point list should be deleted.	Sufficient detail should be included within the Neighbourhood Plan to enable fair and open testing of the contributions that are likely to be required.	A NP is not examined for 'soundness' it is examined to see if it conforms with the Basic Conditions. S106 contributions will be determined by CBC not the NP or Town Council, however, CBC may wish to include the Town Council in its negotiations regarding s106 contributions.	None

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
		examination. Given the statutory tests for planning obligations, it is inappropriate for draft paragraph 17.5 to suggest that the facilities proposed are in line with local priorities. Given the requirement for plans to set out policies for contributions it is inappropriate for draft Policy I1 to set out what a list of essential infrastructure needs “may include”. The policy does not enable a fair and open testing of contributions that are likely to be required.				
14	growt h areas 11.4	Dear Sirs so we are quite new in area but surprised in bad way I know our story doesn't matter much but will be happy if anyone read it may kindly respond?So we bought our house in Leaf Rd early 2021 but we start dealing with agent summer 2020 it took while due all situation with Covid etc. when we look for property main thing was close as possible to open space. When dealing with agent they told us no planning in place around our house we been happy open space just behind our garden, best place for us. After all refurbishment and spending we move in early 2022to our new house after years in busy NW London. Since we got this property we didn't t get any letters from CB council or any other local authority what was planed around our house we quite surprised as I find “great news” on Linmere website that they are granted to build just on back of our garden, and also on your website –Houghton Regis neighbour planning. I don't know when was any public discussion regarding such big development but it must be years ago and estate agent omitted that fundamental			Not relevant to NP	None

Organisati on/referen ce	Sectio n	Comment	Alternative Approach	Missing ?	Response	Change to NP?
4		<p>fact when we dealing???. Also speak with some neighbours and they are surprised that Linmere soon start to build on back of our gardensI understand nothing we can do against is to late but there was any discussion in the past???. As we very s urprised , our dream family house in nearest future will be in middle of big estate. Now we start to rethink all our spring plans to build extensions and all planned garden works. We chose this house espacialy here because because of green on the back great view with evening sunset our place but soon will be over and instead of become part of local community and put our stamp here we now think to put house on the market lo sell it leave before Linmere start messing up just behind of our garden and property will be difficult to sell, as no one wish to live next to big building site. And after that instead of great view will have 4 storey buildings right behind. No idea how it work here as we new but in Barnet where we use to live 16 years even basic things like drop kerb we got letters to oppose or not etc???. May that how CB council treat residents? Not a great experience after 1 year here. Is so many things what you should do for your residents existing and this new one not only give grant to build new estates or another market???. You must to do otherwise it is only “bedroom” for people working hard in London or any other town as not much work here, not enough schools and transport without cat to get out is night mare – by public transport to NW London took minimum 1,45 h-30 miles. Ok sorry may complain too much as I’m frustrated because all this unexpected situation with our new house but bear in mind take care of your existing residents not only bring new one before HG</p>				

Organisation/reference	Section	Comment	Alternative Approach	Missing ?	Response	Change to NP?
		become like neglected over the years Luton				

Central Bedfordshire Council Comments

SECTION OF PLAN	CBC COMMENTS	Response	Change to NP?
14 - Heritage, policy H1	It's really positive that this section of the plan identifies archaeology as important, but Policy H1 doesn't actually strictly accord with chapter 16 of the NPPF or section 18 of the Cbeds Local Plan. I would advise the TC to look at refreshing this policy so the basic requirements that developments need to meet do not conflict with national and local policy.	Agreed, wording updated to reflect national guidance. Policy mistakenly labelled 'H1' should be 'HE1'	Title and wording of Policy HE1 changed
14 - Heritage, Aspiration HE1	It's really wonderful that there is an aspiration to have all the archaeological investigations that are taking place at HRN1 and HRN2 form part of the history of the parish as a whole. I would add that they need to include the M1-A5 link road as well.	Agreed, added	Aspiration HE1 changed
Annex 3	Some of the Aspiration numbers don't quite seem to match the aims. This needs checking	Noted, thank you	Table changed
Policy GSR3 – Local Green Spaces	Site numbers 1-12 to be indicated. Small description and size to be included for clarification.	To be added	Added to NP at Map 3

SECTION OF PLAN	CBC COMMENTS	Response	Change to NP?
Rights of Way	Plan included indicating location of PROWs.	It is not considered necessary to add this to the NP, however the link to CBC website map showing the definitive map can be added at paragraph 12.19	Para 12.19, link added to NP
Policy BNF1 — Biodiversity and Protecting Natural Features	Location of springs to be indicated upon a plan	New map 5 added	Map 5 added after para 13.7
The natural hilltops and viewpoints over the landscape as shown on the Policies Map	Does this have a map number.	Reference added to Annexe 1	Para 13.6 changed
Foreword	The acknowledgment of the importance of sustainable transport is valuable.	Noted	None
8.1	To allow proper understanding of the references made to it throughout the document, more information should be given on the "issues survey". Was this a systematic survey of a representative stratified sample of the population, or an open call for responses that anyone could reply to and therefore only representing the views of those who are aware/interested?	The details of the Issues Survey is set out in the Consultation Report. It was an open survey of people who wished to respond.	None
8.1	For clarity, this should not say "the key issues seem to be:" but "the key issues seem to be perceived as:"	Noted	None
8.11	The support for improved walking and cycling facilities is positive.	Noted	None

SECTION OF PLAN	CBC COMMENTS	Response	Change to NP?
Neighbourhood Plan Aims	Aims 3, 9, 10 and 11 are supported and should be pursued to assist the sustainable integration of Local Plan sites EMP1, EMP 2, HAS29, SA1, SC1 etc into the local transport network, particularly in light of the significant local support indicated in paragraph 8.8 for the localisation of job opportunities within five miles of the town, to enable genuine choice of modes for residents as an alternative to the pervasive car reliance noted in paragraph 7.8.	Noted	None
Policies TC1, TC2, TC3	What evidence is there of a need for additional car parking, the extent to which additional car parking may be needed, and likelihood of the provision of additional car parking encouraging visits to the town centre to be conducted by less sustainable modes contrary to aims 10 and 11 of the draft NP as well as militating against the national Net Zero strategy and Climate Change Act? In the absence of demonstrated need and full consideration of the impacts of increasing the parking supply and alternative approaches to managing the demonstrated need, the parking supply should not be increased.	Concerns noted, however, the policy will be used to determine planning applications which would need to be supported by evidence justifying new car parking spaces. If such spaces are fully justified, the Town Council would support provision through these policies.	None
Policies TC1, TC2, TC3, TC4	Support for improved pedestrian connectivity in policy TC2 is laudable, but begs the questions why this is not present in policies TC1, TC3 and TC4, and why improved cycle connectivity is not similarly supported.	Noted, references added to Policies TC1, TC2, TC3, but not TC4 where this issue is not relevant	Policies TC1, TC2, TC3 changed
10.17-10.18	The proposal of a masterplan to ensure appropriate management of development is welcome. However, for the avoidance of it should be recognised that traffic management included in that masterplan must support non-car modes of transport and engage with the surrounding network to facilitate active and sustainable travel. Multiple references to parking suggest a likely increase in parking supply. Previous comments on this should be borne in mind, and parking expectations for developments be considered in line with CBC's Parking Standards for New Developments.	Noted	None
Aspiration TC1	The desire to retain local services and thereby reduce the need to travel is supported. Aspirations supporting active travel and provide for cycle parking and EV charging are welcome. However, see previous comments regarding parking.	Noted	None

SECTION OF PLAN	CBC COMMENTS	Response	Change to NP?
10.22	As with other sections, any "improvement" to parking should be evidence led and give full consideration to its implications giving priority to improving parking management in preference to increasing the parking supply.	Noted	None
Policy TC6	What is a "bring bank"?	Wording changed to 'domestic recycling banks'.	Policy TC6 changed
11.8	This is a key point, and requires high quality integration of transport options and locally accessible services to support a genuine choice of modes for residents of new developments. It would be positive if this transport aspect were reflected in Aspiration H1.	Noted	Aspiration H1 changed
Policy H2	Noting that in 2019 transport accounted for half of Central Bedfordshire's CO2 emissions, and the support found in the issues survey indicated on the previous page, the omission of sustainable transport ambitions from this policy is surprising and disappointing.	Sustainable transport options are supported in Policy TCP1:Access and Connectivity	None
Aspirations GSR1 and GSR2	It would be worthwhile for these aspirations to encompass the accessibility of these sites by sustainable travel, whether in improving access to existing sites or assuring high quality provision for new ones, and securing the provision of related infrastructure such as benches for pedestrians to rest and Sheffield stands for cycle parking. The aspiration to improve Sewell Greenway is welcome. See previous comments on parking provision, in addition to which the location "between the road and the field berm" appears to be a site where it would have to be "in place of the existing shared use path" - it is surprising and disappointing that an aspiration to remove this active travel infrastructure has been included and should parking be developed here a replacement active facility of at least equal quality must be provided for before the removal of the existing one.Ag	Agreed, additional bullet point added to aspiration GSR1. There has been a misinterpretation of GSR2, the shared path will remain.	GSR1 and GSR2 changed
Aspiration GSR3	The cycle parking mentioned in 12.18 should be reflected in this aspiration, to safeguard the likelihood of suitable provision being made.	Agreed, added to Aspiration GSR3	Aspiration GSR3 changed
Policy BE1	What is meant by "appropriate parking" should be clearly defined.	Noted, appropriate would relate to the application proposed and CBC parking standards	None
16.2	This is incorrect, confusing and conflating the Local Transport Plan (LTP3) covering all of CBC with Local Area Transport Plans (LATPs) covering subdivisions of the authority area. The word Area and "A" in the acronym should be deleted.	Error amended	Para 16.2 changed

SECTION OF PLAN	CBC COMMENTS	Response	Change to NP?
Issues survey (page 62)	While this is illustrative of the views of those residents who responded to the survey it is not instructive, particularly in the absence of information allowing it to be properly interpreted as remarked on in relation to paragraph 8.1. Although public opinion is important, it is neither the only nor necessarily the most important consideration and due regard must be had for national and local policy imperatives, and their firm scientific basis as to the essential need to move urgently to reduce CO2 emissions although some members of the public may view this as "least important".	The Issues survey references throughout the document are helpful to give an indication of residents views. The NP does need to be in general conformity with the Local Plan Strategic Policies and have regard to National Planning Guidance.	None
16.3 (and elsewhere)	The 2011 census data should be replaced with that from the 2021 census.	Census data is not fully available at the time of writing	None
16.5	The description of rail services via Luton is inaccurate and should be revised to reflect actual Thameslink services (which do not run north of Bedford) and existence of East Midlands services, which run as far as Corby.	Noted, paragraph 16.5 changed	Paragraph 16.5 changed
16.8-16.12	These points are supported.	Noted	None
Policy TCP1	The policy ought to be more ambitious and say "must" rather than "should".	It may not be possible for every new development proposal to be connected.	None
Aspiration TCP1	The aspirations seem limited in scope, and more ambition would be welcome. If other routes/measures have not yet been identified, an aspiration to fund improvements identified in the LCWIP once it has been developed would be appropriate. This could encompass partnership working to support the work that CBC are leading on in the LCWIPs to identify new walking / cycle routes and improvement to existing routes, rather than being specific about two routes.	Agreed, wording of Aspiration TCP1 amended to reference LCWIP	Aspiration TCP1 changed
16.15	It would be better to say "where there is a demonstrated need" than "where possible".	When considering a planning application which could remove public parking spaces, it may not be practicable or possible to demonstrate a	None

SECTION OF PLAN	CBC COMMENTS	Response	Change to NP?
		specific need for those spaces.	
16.16	The consultation on the on street parking strategy has been completed and its adoption is anticipated imminently. This paragraph should be updated accordingly.	Para 16.16 updated	Para 16.16 changed
16.17	The support for CBC's parking standards for new developments and for ensuring appropriate drainage is commended.	Noted	None
16.18	CBC's "Electric vehicle charging: guidance for new developments - Supplementary Planning Document (SPD)" (adopted in December 2022) containing local requirements in addition to those of Building Regs should be referred to - see https://www.centralbedfordshire.gov.uk/info/45/planning_policy/1233/electric_vehicle_charging_guidance_for_new_developments_-_supplementary_planning_document_spd	Noted, change to para 16.18	Para 16.8 changed
Policy TCP2: Parking	The first paragraph is commended.	Noted	None
	The Second paragraph's rejection of loss of parking and insistence on equal or greater reprovision is contrary to climate commitments, and may set requirements for individual sites that are contrary to CBC's parking standards for new developments. See previous comments on levels of parking provision.	Noted, and words added if the need for the spaces is no longer justified, however, the reduction in public car parking spaces would likely have an adverse impact on the activity in the Town given the high reliance on the car.	Change to TCP2
	The third paragraph is contradictory to paragraph 16.17, and could lead to inappropriate approaches to drainage as it is always possible to use permeable surfacing, but this does not mean it will always be appropriate and at times other solutions (such as impermeable surfacing with gully drainage to SUDS) may be preferable.	Agreed, 'appropriate' also includes 'possible'	Change to TCP2
	The fourth paragraph is supported, but should refer to the "Electric vehicle charging: guidance for new developments - Supplementary Planning Document (SPD)" rather than the Parking Standards.	Agreed	Change to TCP2
Aspiration TCP2	The aspirations seem consistent with CBC transport policy, and are supported.	Noted	None

SECTION OF PLAN	CBC COMMENTS	Response	Change to NP?
18.5	Suggest rewording for clarity as it currently implies very great influence for the LTP: it may be better to say something like "through the Local Plan, Local Transport Plan, and other policies and strategies".	Para 18.5 changed	Para 18.5 changed
18/19	As section 19 is "Monitoring and Review" should 18 just be called "Implementation" not "Implementation, Monitoring and Review"?	Changed, thank you	Title of Section 18 changed
Annexe 1	The policies map is not shown on the policies map page, nor does it appear to be available separately.	The consultation version of the NP omitted the map in error but was changed to include the Policies Map and the Consultation period extended	None
TCP2 Parking	As we (CBC) will have a SPD in place, that will supersede anything that is written in a Neighbourhood Plan (I think!) as they have quoted in 1.2 <i>be in general conformity with strategic local policy</i> so am wondering if this section is needed?	The SPD will not supercede the NP. This section is needed because it is of major concern to residents and gives a local take on CBC policies.	None
Policy TCP2 Parking (p67)	The section on implementation of EV charge points. EV charge points can only be insisted upon where planning permission is required (to provide new or extend an existing car park). An existing car park that has maintenance work carried out would not require EV charge points to be implemented - there is no legal requirement for this. If the Town Council own the car park they can make that their own policy but they can't insist on other landowners doing the same. I think this needs to be clarified.	The NP policy has equal weight to a Local Plan policy once the NP is 'made' therefore this provision can be a requirement of a planning application decision, no matter who the owner of the site is.	None
17.3 CIL	I'm not clear why they have included a paragraph on community infrastructure levy and then said CBC don't have a CIL charge in place? I think this would be through section 106 contributions but this isn't mentioned.	CBC may decide to introduce CIL over the timeframe of the NP	None
Safety	Pleased to see that the ASB issues have been mentioned in the plan and commitment to work with both the Police and CBCs Community Safety Team to tackle this issue.	Noted	None

SECTION OF PLAN	CBC COMMENTS	Response	Change to NP?
Community Facilities	Reference to community facilities and their importance to the Town could be more prominent in the analysis and the policy. For example there is no reference to community facilities in Policy I1	Noted, reference added, thank you	I1 changed
General comments	Having a list of the policies after the contents page would be useful	Noted	Yes, contents list changed
General comments	It would be nice to have some of the pictures annotated as to what and where they are, to give context to them.	Noted	Annotations added
Section 7	Section 7 the Context and History of the area it is very detailed and feel that could be summarised.	Noted, but this information is of interest to local residents.	None
Page 35	Paragraph 11.21 page 35 part of the wording at the end of this section has been split by the text box Aspiration H2 – Safety and Security, the text box needs to moved down the page.	Noted, formatting changes will pick this up.	None
Annexe 1	Annexe 1: Polices map, this page is blank and the map seems to be missing	The consultation version of the NP omitted the map in error but was changed to include the Policies Map and the Consultation period extended	None
Policy TC2: High Street West	Part of this site falls within Local Plan Policy EMP1 – Employment Sites, which allows for B2, B8, E(g) uses. The neighbourhood plan has identified it for leisure, hospitality and entertainment uses which would generally fall under E(d), C1 and Sui Generis uses. The Local Plan does also states that exceptions will be considered on a site-by-site basis. I would be mindful that we would not want to lose existing employment sites.	Noted, a balanced judgement would be needed if CBC were determining a planning application.	None
Policy TC4: All Saints View	Part of the site is within the conservation area, it might be worth noting that within the policy it may be beneficial to include some appropriate wording such as “development should positively contribute to the charter and appearance of the conservation area”.	Agreed, sentence added	Policy TC4 changed
Policy TC5: Houghton Regis Masterplan	They is an identified need for town centre master plan in the text but this policy is not noted as such. There is a Houghton Regis North Framework Plan which relates to the strategic allocation, but there is not currently a town centre master plan, are they proposing to do a Town Centre Masterplan or are they waiting for Central Bedfordshire Council to do one - it is therefore not clear what this policy relates to, and it is considered policies should not be included that relate to documents that have not yet been produced. The neighbourhood plan could be updated if and when those document have been produced and adopted.	Reference added to Aspiration TC1, wording added to Policy to make it clear that the masterplan has not yet been produced.	Policy TC5 and Aspiration TC1 changed

SECTION OF PLAN	CBC COMMENTS	Response	Change to NP?
Policy TC6: Local Centres	<p>I think this is a very restrictive policy in its wording. Where it says ‘will not be permitted’, I feel that should be changed to: Proposals for the change of use or re-development of shops or public houses in the neighbourhood centres, which would result in the loss of such facilities will be resisted, unless: The policy states “ There are other facilities performing the same function within easy walking distance of the community”. What is classed as within easy walking distance? This needs to be defined, 10mins around half a mile is normally classified as acceptable. Overall I think the policy does not take account of the new use class E and the possible changes within it which allow for change without planning permission.</p>	<p>This is a strongly worded policy because local facilities are very important to local people. Some additions have been made to the text to reflect Class E</p>	<p>New para 10.23 added, 10.24 changed, Policy TC6 changed</p>
Policy GSR1: Play and Recreation Spaces and Policy GSR3: LGS	<p>Both these policies refer to specific sites and Map 3 shows the local green spaces and is numbered 1-12, but the sites in the policies are not numbered and it is therefore not possible to know which number responds to which site. This could be made clearer.</p>	<p>Policy GSR3 changed and numbers added after Map 3</p>	<p>Policy GSR3 changed and numbers added after Map 3</p>
Policy H2: Sustainable Development	<p>The way the policy is written it feels more like a statement, rewording would improve it such as; <i>The design and standard of all new development will be expected to achieve a high level of sustainable design and construction.</i> <i>All new development where feasible, should incorporate energy efficiency into the design process, targeting net zero carbon emissions. This involves</i> <i>Siting and orientation to optimise passive solar gain.</i> <i>The use of high quality, thermally efficient building materials.</i> <i>Installation of energy efficiency measures such as loft and wall insulation and double/triple glazing.</i> <i>The incorporation of on-site energy generation from renewable sources such as unobtrusive solar panels appropriately positioned.</i></p>	<p>Noted, wording changed</p>	<p>Policy H2 changed</p>
Beechwoods Special Conservation Area & Zone of Influence	<p>Houghton Regis falls within the area of the Chiltern Beechwoods Special Conservation Area (SAC) & Zone of Influence. The Council have sought legal advice, that has recommended that Neighbourhood Plans within the Zone of Influence should include a policy on Beechwoods that sets out what the SAC is, what the restrictions are, what type of development is affected and what mitigation will be required. A link could helpfully be provided to the Council’s website where the Mitigation Strategy has been published.</p>	<p>Noted, new paragraph added at 13.3 however, an additional policy on this matter is not considered necessary when CBC have a mitigation strategy.</p>	<p>New paragraph added 13.3</p>