



Langford Neighbourhood Plan

Consultation Statement

November 2020 – July 2021

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1. Statutory Compliance

- 1.1 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Langford Neighbourhood Plan (LNP)
- 1.2 The legal basis of the Consultation Statement is provided by section 12(2) of part 5 of the 2012 Neighbourhood Planning Regulations (as amended) which requires that a consultation statement should:
 - a) contain details of the persons and bodies who were consulted about the proposed Neighbourhood Plan
 - b) explain how they were consulted
 - c) summarise the main issues and concerns raised by the persons consulted
 - d) describe how these issues and concerns have been considered and where relevant, addressed in the proposed Neighbourhood Plan.

2. Introduction

- 2.1 Langford has always been a thriving community with many hobby, sporting and special interest groups, committees and societies. Due to its location near major transport arteries (the A1 and the East Coast railway) and the attractive surrounding landscape, Langford is a popular village and has grown quickly over the past 10 years. Expansion has presented benefits but also challenges due to poor infrastructure and pressure on transport links locally.
- 2.2 The Parish Council is extremely active in promoting the interests of the village, regularly communicating and consulting with residents on a range of topics. As stated, in recent years the greatest concern has been the rapid expansion of the village with large-scale housing developments. The Neighbourhood Planning process was therefore seen as an excellent vehicle for giving residents a more formal 'voice' in deciding the future of their village.

3. Langford Neighbourhood Plan Steering Group

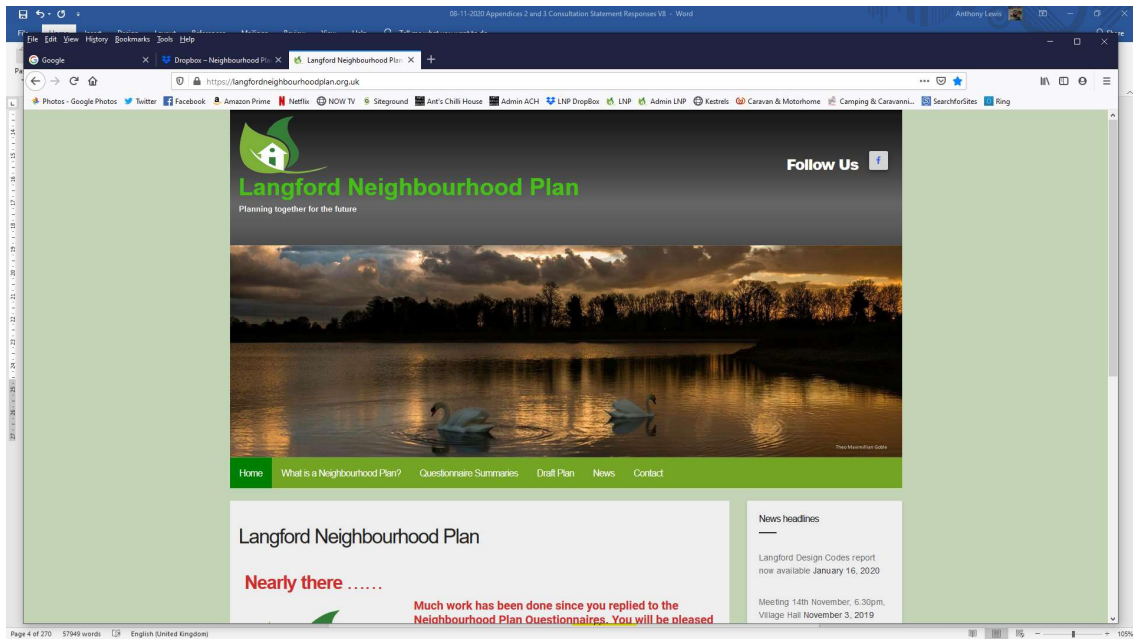
- 3.1 The Langford Neighbourhood Plan (*hereafter referred to as LNP*) process started in June 2018 after a local appeal was made by the Parish Council for interested residents to form a Steering Group to begin the work. The Steering Group is chaired by Cllr John Shipman, deputy chairman of Langford Parish Council, supported by Michelle Albone, Parish Clerk.
- 3.2 The Steering Group comprises a core number of about 10 people including residents who have contributed time and specialist knowledge on specific subjects, such as utilities and transport. Other residents have given their time

on a more ad hoc basis over the past two years, for example in taking and submitting photographs for inclusion in the Plan.

- 3.3 An internet 'Dropbox' was established by the Steering Group to deposit relevant documents, photographs and other materials for reference purposes.
- 3.4 The first Steering Group meeting took place at Langford Village Hall June 2018 at which approx. 15 interested residents attended. Cllr John Shipman chaired the meeting and introduced the nature and purpose of Neighbourhood Plans.
- 3.5 The second meeting was a workshop in which four sub-groups brainstormed the issues likely to be of interest and relevance to the people of Langford. Four themes emerged from this work, to be developed and taken to Langford residents for consultation: *Infrastructure, Environment, Transport and Development*. (Appendix 6.1 contains images of flipcharts that were created on these themes). Subsequently Steering Group meetings have taken place at least every month to develop the LNP.
- 3.6 At a meeting on 20/6/18 Tom Price, Neighbourhood Involvement Officer from Central Bedfordshire Council (CBC), made a presentation to the newly-formed Steering Group, at Langford Village Hall, on the background to neighbourhood planning, the CBC approach and sources of funding.
- 3.7 From the outset, the LNP Steering Group resolved to consult widely and regularly with residents, local organisations, businesses and national bodies about the purpose and progress of the development work. A variety of communication channels were used to keep Langford residents informed about the progress of the project, and to continually offer opportunities for people to get involved.

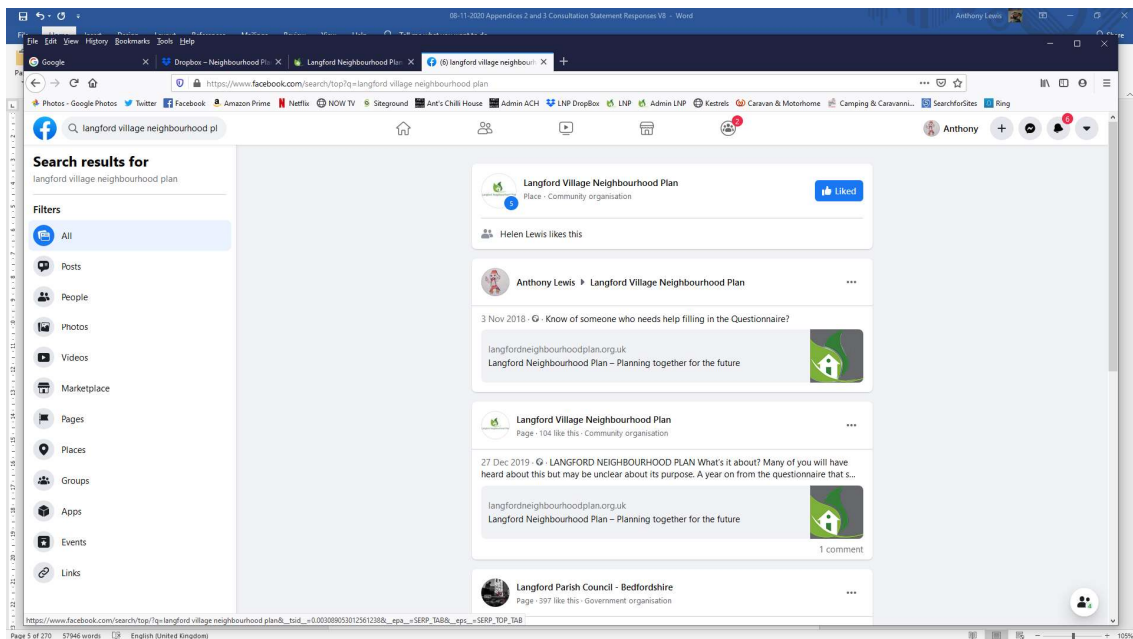
4. Communication Process and Actions

- 4.1 Langford has benefitted from a well-supported *Village Diary* for many years which goes to all households in the village. In September 2018, an introductory article was included in the Diary as a separate leaflet (see Appendix 6.4.2. This 'set the scene' and invited views and suggestions for the LNP, and an invitation for more LNP Steering Committee members.
- 4.2 A website was established to help communicate progress with residents. This also contains the analysis of the questionnaire sent to residents in November 2019 (A summary of the findings is available in Appendix 6.4.3), the evolving draft Neighbourhood Plan itself and other relevant documents to help keep residents informed and involved.



<https://langfordneighbourhoodplan.org.uk/>

- 4.3 In addition, the Langford Neighbourhood Plan Facebook Group was set up on 13th September 2018 to help communicate progress and to continuously elicit views and contributions from Langford residents. At present the Group has 109 followers and the content is regularly updated.



https://www.facebook.com/langford_village_neighbourhood_plan

- 4.4 Large banners were produced and have been prominently displayed on railings in the village.



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- 4.5 Local businesses were seen as an important group to involve. A survey of business needs was undertaken – see LNP Appendix C: Business Questionnaire Summary.
- 4.6 The statutory pre submission public consultation on the Neighbourhood Plan, as required in Section 21 of the Neighbourhood Planning (General) Regulations 2012, ran from 1st November 2019 until 15th March 2020. This was launched with a ‘flyer’ (Appendix 6.4.2) presented in the form of an on-line questionnaire (https://docs.google.com/forms/d/e/1FAIpQLScMlf-av627yRZh37LuPNS9wR-bU4VdF0H_YV4maQCBwckcpg/viewform) that was compiled by the LNP committee and issued via the LNP website and Facebook group. Paper versions were also available for residents without access to the internet and two facilitated sessions took place at the Church Hall to provide assistance to those who required help. Statutory consultees, landowners, businesses, and other stakeholders were invited to comment via email or letter.
- 4.7 In total the LNP Committee received 441 responses from residents (about 35% of households from the 2011 Census), many more than expected. Analysis of the responses (a summary of results can be found in Appendix 6.4.3) took place in December 2018 and January 2019 and the outcomes communicated to residents, again via the website, Facebook Group and Langford Diary newsletter.
- 4.8 Village Groups, the school, neighbouring villages, Biggleswade Town Council, businesses, housing developers and utility companies were consulted by a variety of means including presentations, meetings and letters sent by the LNP Committee.
- 4.9 No opportunity was lost at village events to publicise the Plan proposals and communicate with residents:
- a) A regular meeting of the coffee morning group at the Church hall was devoted to a presentation about the questionnaire, in November 2018. This was specifically to offer assistance to people who do not have internet access and who needed to complete the questionnaire on paper.

- b) At Langford's annual 'Tidy the Village' day in April 2019 a stand was placed in the Church hall.



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- c) A stall and display at the ever-popular summer fete in June 2019 was well attended. LNP Steering Group members, wearing LNP T-shirts, were present and answered many questions from residents.

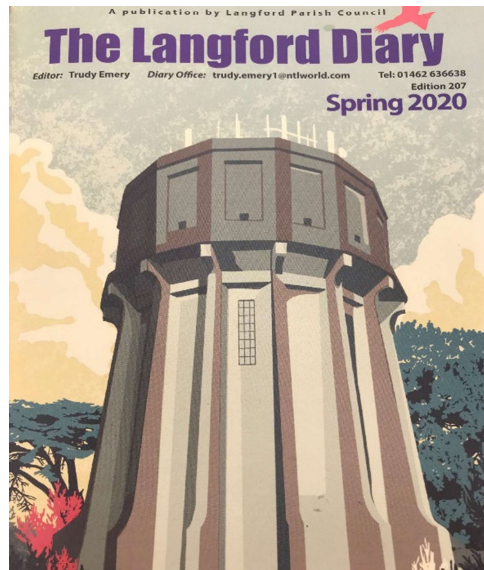


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- d) A similar stall was placed at the village Christmas fete in December 2019. This was made 'interactive' by giving residents the opportunity to make further comments and suggestions using 'post-it' notes on a map of the village.



- 4.10 Langford has a well-produced 'Langford Diary' publication delivered quarterly to all households. Most issues have included updates on progress in developing the Plan.



- 4.11 It should also be noted that throughout 2018-2020 Langford Parish Council continued to be extremely active in communicating with residents, for example by inviting people to monthly Parish Council meetings and co-ordinating communications and meetings regarding major housing development. When planning applications for large scale housing developments were considered by the Parish Council, these were well attended by members of the public who were given the opportunity to speak. Every monthly meeting of the Parish Council includes an update of progress in developing the Plan.
- 4.12 Consultation has at all times been open and transparent. All relevant documents pertaining to the Plan are placed in a *Dropbox* file on the internet. This is publicly accessible to all residents.
- 4.13 The Timeline is included in Appendix 1 to show the sequence of events for all these strands.

5. Consultation with Groups and Organizations

In accordance with Neighbourhood Planning (General) Regulations 2012, Regulation 14, a wide range of groups, organizations and statutory bodies were consulted about Langford Neighbourhood Plan proposals. A full list of the statutory organisations is included as Appendix 6.3 and other clubs, groups and organizations can be found in the following sections. A timeline of key dates and documents can be found in Appendix 6.2. Regulation 14 responses and Steering Group actions/comments can be found in Appendix 6.

Responses received from additional groups and organizations can be found below:

5.1 Schools and Pre-school groups

Summaries of consultations with Langford Village Academy, Henlow Church of England Academy and Owlets Pre-School follow. Supporting documents can be found in Appendix 6.4.

5.1.1 Langford Village Academy (Middle School)

The staff of Langford Academy were asked to consult with the children and to seek their views on Langford now and in the future. The staff asked the children to discuss and write down their thoughts following the presentation of the following questions. They were invited to illustrate their answers with pictures if they wanted to.

Q1. What 2 things would you like to have in our (Langford) village in the future?

Q2. What do you like and dislike about our (Langford) village?

137 children, all residents, of Langford responded with a variety of answers. The following classes took part: Year 3-4 Orca; Year 3-4 Otter; Year 2 Turtle; Year 3 Dolphin; Year 1-2 Seahorse and Penguin; Foundation.

The responses were considered and grouped under the four main headings used in the Neighbourhood Plan.

Transport – in this area the children disliked the volume and the speed of the traffic which causes pollution and noise. In addition, they were critical of the disorganised parking outside their school. They suggested better parking could be organised.

Planning and Development - here the children showed a preference for well-designed and aesthetically pleasing houses together with their school. They were critical of too many houses consuming their countryside. Some mentioned homes close to noisy trains. Many said they were happy with size of Langford and did not want it to become bigger.

Environment - this is an important area for the children and they are very concerned about the volume of litter and dog poo in the village and in particular, on pavements. The quality and number of trees and flowers was mentioned many times and the children clearly wish for better protection or improvements in this area.

Infrastructure – the children like the park amenities, the friendly people and the scenery. They also expressed a desire for more active play equipment in the village including a zipwire and a swimming pool or a water splashpark. Some asked for a bigger school with more space. They like the church and its historical significance. To satisfy their priorities more ice cream/sweet shops, an arcade, cinema and fast-food outlets for them and their parents were also mentioned. Some pictures expressing their views can be found in Appendix 6.4.6.

5.1.2 Henlow Church of England Academy

82 pupils took part in the above consultation for the Langford Neighbourhood Plan. The pupils ages ranged from 9 to 13. They were asked a number of questions and worked on them together in a mixed age-range grouping. The questions they were asked were: What do you like/dislike about Langford? Which two things would you like to have in Langford in the future? The responses returned brought out some common themes.

- a) Likes: friendly people; Post Office; park; skate park; river
- b) Dislikes: drug users; litter; continual building
- c) What pupils would like to see: recycling bins; bottle exchange; a larger skate park; outdoor gym equipment; gym; Youth Club; swimming pool; countryside conservation area

5.1.3 Owlets Pre-school Group

7/5/19 Reply from Owlets Pre School Group based at The Chapel, High Street, Langford.

Questions:

- a) What do you like about Langford? Good community spirit; friendly village.
- b) What do you dislike about Langford? Not enough facilities; not enough shops; nothing to fulfil teenage needs.
- c) How many Langford children attend your pre-school unit? 26 4.
- d) How many non-Langford children attend your pre-school unit? 1 5.
- e) What additional space requirements do you need in the next 5 years in Langford to serve an increasing population of Langford residents? Money would need to be spent to improve our premises. As we do not own the premises, we are unable to change the structure externally. Internally, there is room for major improvement. A purpose made building. At present we are able to take 32 children per session (room space is measured to allocate the number of children allowed).
- f) What do you consider are the strengths and weakness in Langford for your preschool unit?

Weakness: old premises in need of some renovations and improvements; limited parking; limited 32 child spaces per session; limited to what hours we can open due to prior chapel commitments on a Thursday pm.; limited outside space; limited storage

Opportunities? look at empty buildings in Langford to renovate. At present, we have no internet access at our preschool.

5.2 Village churches and community groups

During April and May 2019, a number of clubs and organisations that operate within Langford were contacted by members of the NP Steering Group and

asked to contribute any additional comments in respect of the four focus areas for the neighbourhood plan: Environment, Transport, Planning and Development and Infrastructure.

It was emphasised that the comments were to be made from the club/organisation perspective based around the question:

What aspects would help the organisation thrive for the benefit of Langford and its residents in the future?

The 18 responses received, are listed below and represents over 500 members of the community of which, 60% were from the older or retired age groups but with a significant number of younger people who were involved in cubs/beavers/scouts and sports clubs.

The responses were analysed to identify key themes and a summary of the findings are as follows:

Environment

1. Access to green spaces was valued and important to be kept that way. "We need to keep our lovely green spaces for the next generation....."
2. Opening up of more public footpaths and cycle paths and a call for some of them to be accessible for wheeled push chairs. Better maintenance of pavements and paths to improve opportunities for those with disabilities or the elderly.
3. Value the churches as a focal point for their history and contribution to the community.

Transport

1. Lack of parking was identified as an issue e.g. for transporting elderly residents to doctors, shops etc. and a barrier to accessing community facilities such as the chapel.
2. Parking around the school at key times limited access for others to use the parking for church and doctors, but also impeded access for others using the village hall at this time. Inconsiderate parking can obstruct the passage of mobility scooters and pedestrians.
3. Potholes in the road was an issue for cyclists and car drivers.
4. Lack of public transport – improvements would bring opportunities. The Ivel Sprinter (community minibus) service could be expanded with demand and funding.

Planning and development

1. Potential to develop existing space and infrastructure to increase community /social interactions. For example, use of church land for a living churchyard, larger hall for physical activity classes, carpet bowls
2. Installation of bike racks in key areas
3. Developments should increase options for walking
4. Developments should be small, improve housing provision for local families and the elderly.

Infrastructure

1. Better access for medical appointments
2. Infrastructure in place before the development and influx of people.

Contributions were made from the following groups, clubs and organizations:

Groups: Beavers; Cubs; Scouts

Cubs: Cricket; Bowls; Walking Group; Cycling Group; Langford Friends; History Society; Welcome Club; Women's Institute; Ivel Sprinter; Methodist Chapel; St Andrews Church; Yoga; Oasis Coffee Shop; Morning Coffee Shop; Ballroom Dancing

A further response from St. Andrews Church can be found in Appendix 6.5.5.

5.3 Langford Businesses

The views of Langford businesses, based upon open e-mail invitations to respond and a business questionnaire are summarised in the LNP Appendix C: Business Questionnaire Summary.

5.4 Other Neighbourhood Plan areas

During the process of developing the LNP, various other local Neighbourhood Planning groups were consulted including Northill, Clifton, Arlesey and Biggleswade. In the case of Northill, the Chair of the Steering Group attended a meeting of the LNP Steering Group for a question and answer session (minutes can be found in Appendix 6.4.1). This collaborative work helped to reduce the time taken to develop the LNP.

5.5 Outside Agencies and Stakeholders

At various stages in the development of the LNP, support has been sought from a variety of outside agencies to help produce surveys, reports, evidence, feedback, maps and documents. These "critical friends" have been invaluable and their contributions are found throughout the array of LNP documents.

Outside Agencies and stakeholders include:

CBC	Development Management
CBC	Flood Risk
CBC	Planning Policy
CBC	Ecology
CBC	Archaeology
CBC	Neighbourhood Involvement

CBC	Environmental Services
CBC	Landscape
BRCC	Housing Needs Survey & Report
CBC	SEA Report
AECOM	Design Guide Analysis and Report
Intelligent Plans	Pre-inspection Health Check
Bedfordshire Police	Secured by Design
Property Developers	Gladman, Planning Prospects, Bloor Homes

5.6 Statutory Consultees

A full list of these can be found in Appendix 6.3 and their responses in Appendix 6.6. These include (in addition to CBC responses in Appendix 6.7):

Services

1. Anglian Water
2. National Grid

Health

1. Saffron Health Partnership
2. Ivel Medical Centre

CBC

1. Strategic Environmental Assessment (SEA)
2. Flood Risk Assessment

Organizations

1. Natural England
2. Historic England

LNP Steering Committee responses can be found in Appendix 6.7.



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Langford Neighbourhood Plan Consultation Statement Appendices

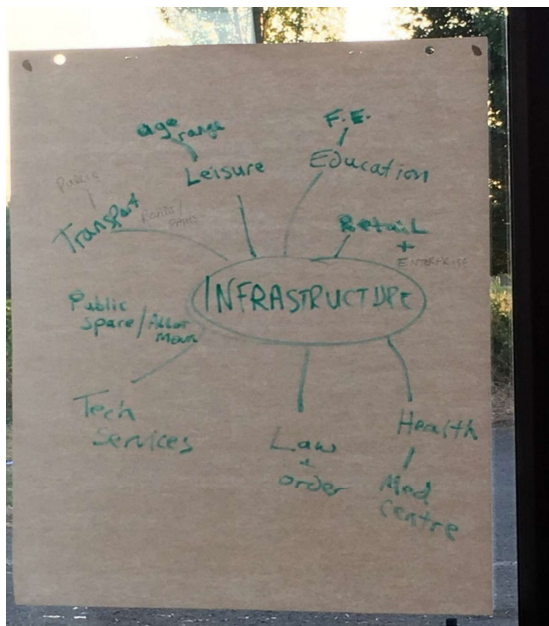
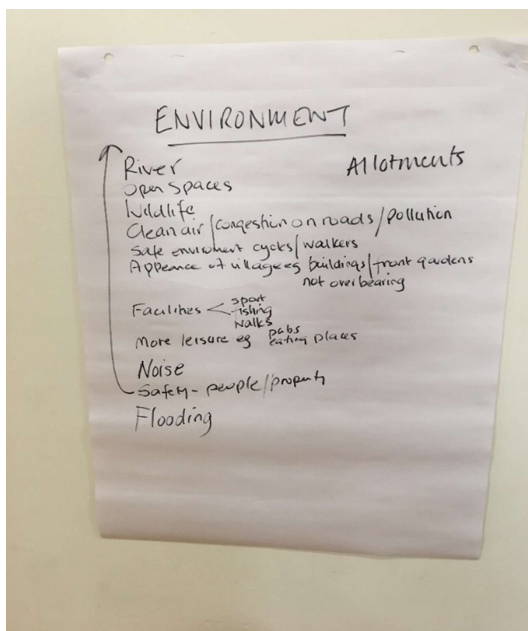
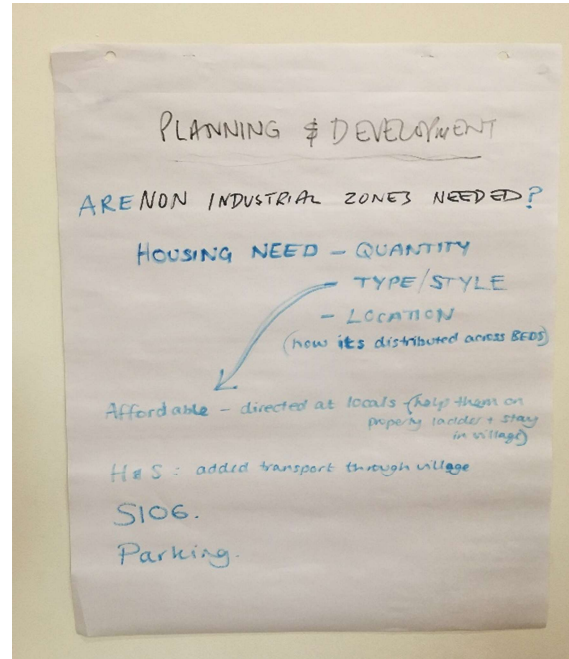
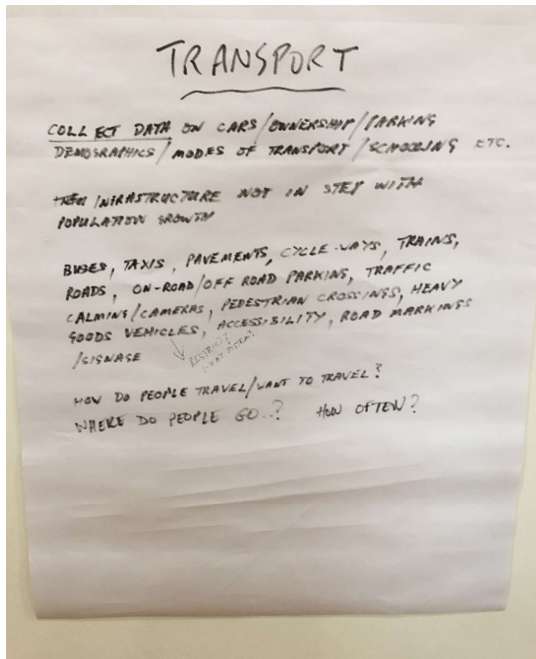
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Appendix 6.1 Theme Development

After the initial meeting of the LNP in June 2018, two brainstorming workshops were used to develop the overarching themes for the LNP. These were attended by 26 members of the Langford community.

The outcomes from these 'brainstorming' sessions were the development of the four themes which have now formed the basis of the LNP. Images of the resulting flipcharts can be seen below:





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Appendix 6.2 Timeline of documents and events

Documents	
4/7/18	Langford Decision Notice
30/10/18	Questionnaire sent to all residents
Jan 2019	Questionnaire analysis issued
March 2019	Housing Needs Survey issued
25/4/19	Business questionnaire issued
April 2019	Clubs and Societies questionnaire issued
11/4/19	Feedback and pictures from Langford School
25/4/19	Business questionnaire issued
April 2019	Clubs and Societies questionnaire issued
May 2019	Housing Needs questionnaire report
8/5/19	Feedback from Owlets Playschool
14/5/19	Feedback from Henlow Middle School
23/5/19	Feedback from Ivel Medical Centre
13/6/19	Consultation with Saffron Health Partnership
29/7/19	Meeting with Saffron Health Partnership
23/9/19	Feedback from Biggleswade Town Council
Nov. 2019	PlaceCheck Survey
Dec. 2019	Design Codes Survey report (AECOM)
Nov 2019- March 2020	Feedback from developers, community members, CBC
10/2/20	Letter sent to various organisations by Michelle Albone, Parish Clerk

13/2/20	Feedback from BRCC
14/2/20	Feedback from Natural England
18/2/20	Feedback from National Grid (via Avison Young)

Events and Publicity	
20/6/18	Tom Price from CBC addressed Langford residents interested in forming NP Steering Committee
5/7/18	Brainstorming session to identify key areas of concern ('themes')
5/7/18	Meeting to establish Steering Group sub-teams to work on the four key themes
1/8/18	Establishment of Steering Group membership
13/8/18	LNP Facebook Group set up
9/3/19	Further meeting to refine key themes into potential policy areas
30/3/19	Display at Church Hall during litter-picking event
May 2019	Housing Needs Survey conducted
June 2019	First NP banner created
July 2018	First flyer in Langford Diary
Oct 2018	Second flyer
Oct 2018	Poster created re. questionnaire
15/11/18	Presentation to LNP committee by H Papworth, Northill NP
25/2/19	Drop-in session at Village Hall
30/3/19	Display at Church (Tidy up Day)
6/7/19	Display at Village Fete
29/7/19	Meeting with Practice Manager at Saffron Health Partnership in Biggleswade
14/9/19	Display (Meet and Greet) at Church Hall during village groups forum
20/9/19	Meeting with Biggleswade Town Council
14/9/19	Questionnaire presentation at Church Hall
28/9/19	Display at Church Hall during litter-picking event (Tidy up Day)
17/10/19	Presentation on 'Placecheck' at Village hall
Nov. 2019	PlaceCheck survey Informally meeting local residents during AECOM visit, plus tour of village
Nov. 2019	Informally meeting local residents during AECOM visit, plus tour of village

14/12/19	Display at Langford Christmas Fair, with opportunity for residents to comment on what they like/dislike about the village
27/12/19	Flyer posted on FB and distributed in Langford Diary/Villager
14/1/20	Display at Public Enquiry, Village Hall
19/2/20	Drop-In session at Village Hall
Continual	Updates and requests for feedback on local FB Groups
Continual	Drainage, sewage and water supply consultations.



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Appendix 6.3 Statutory Consultee list

The following organizations were e-mailed regarding the LNP Reg. 14 Consultation notifying them of the consultation and requesting their responses:

TYPE	ORGANISATION NAME
Economic	SEMLEP
Equality	Citizen's Advice
Equality	Bedfordshire Humanists
Equality	Health Inequalities
Equality	Sensory Impairment
Equality	Gender Equality Issues
Equality	Disability Resource Centre
Equality	Citizen's Advice
Equality	Bedfords Council of Faiths
Equality	Mind BLMK (Mental Health)
Equality	Housing
Equality	Faith & Poverty Issues
Equality	Learning Disabilities & Mental Health
Equality	Citizens Advice Bureau
Equality	Older People
Government	Natural England
Government	Historic England
Government	Health & Safety Executive
Government	Environment Agency
Government	NHS England
Government	Highways England

Government	Secretary of State for Transport
Government	The Homes & Communities Agency
Government	Homes England
Government	Defence Infrastructure Organisation (MOD)
Health	Bedfordshire CCG
Health	Central Bedfordshire Council
Business	Bedfordshire Chamber of Commerce
Local Environmental	Bedfordshire & River Ivel Internal Drainage Board
Local Environmental	BRCC
Local Environmental	CPRE
Local Environmental	Woodland Trust
Local Environmental	Wildlife Trust
Local Environmental	RSPB
Local Environmental	Greensand Trust
Local Environmental	Sustrans
Local Planning Authority	Central Bedfordshire Council
Local Planning Authority	Bedford Borough Council
Police	Police and Crime Commissioner
Police	Bedfordshire Police HQ
Fire	Bedfordshire Fire & Rescue
Race	Gypsy Council
Rail	Network Rail
Telecoms	Vodafone & O2
Telecoms	Three
Telecoms	OpenReach BT
Telecoms	EE
Telecoms	Virgin Media
Electric	National Grid
Electric	UK Power Networks
Water	Anglian Water
Water	Affinity
Water	Severn Trent Water
Water	Cambridge Water
Town Council	Biggleswade Town Council
Parish Council	Clifton, Henlow, Arlesey, Shefford, Dunton, Northill



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Appendix 6.4 Community consultation

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Appendix 6.4.1 Minutes from LNP steering Group meeting with a representative from Northill NP Steering Group

Steering Group

Minutes of Meeting on 15th November 2018, 7:30pm

At Langford Village Hall

Present:

John Shipman (Chair), Julian Vaughan, Ian Sommerschild, Mick Beazley (LPC), Michelle Albone (LPC), Helen Knowles, Anthony Lewis, Keith Hichisson, David Hawkes, Perry Huntley, Anna Livings, Helen Papworth (Chair of Northill NPSG)

Apologies

Gill Clarke (LPC), Barb Hammond (LPC), Becky Roe-Smith, Caroline Hawkes, Julie Springett, Dave Bellwood, Malcolm Wray, Tanya Barr, Mike Thorn, Malcolm Penny

Confirmation of minutes for meeting held on 11th October

Confirmed as correct

John welcomed Helen Papworth from Northill NP SG to the meeting, and thanked her for taking the time to come along to give some advice to the Langford Group.

Helen started by introducing herself and asked the Group if they would be looking at sites to put forward, but thought not as Langford had so many new sites in the last few years. John confirmed the Group did not intend to look at sites. Northill have taken 4 years to get to this point (final submission to CBC)

<http://northillneighbourhoodplan.org/files/1.%20Northill%20Parish%20Neighbourhood%20Plan.pdf>

Northill firstly arranged for a Green Infrastructure plan to be drawn up which was carried out by BRCC and paid for by a NP grant from CBC.

The Group then carried out local consultations with the residents on what bothered them in the Parish and asked residents to put forward suggestions for new sites which generated 30 locations and some more were picked up in the call for sites. They placed an advert in the local paper asking landowners to come forward and of the sites identified by residents only one site was already known to CBC. Few residents came to the site assessment meetings. One particular site caused some issues.

The Group divided into working groups and each group was given a task to find out information on those identified areas (similar to Langford NP groups). The information these groups obtained is filed in the report section of the website.

Northhill started with 15 members on the NP and at the point of submission to CBC is now down to 6 members.

Response rate for questionnaires was over 38% with residency of approximately 2000 in the Parish. They held evening and afternoon events to try to capture interest, and held 7 workshops including young person days. They aimed to target families, though were rather light on input from youth groups. They identified some youths who had received grants from the Parochial grants and asked them to fill out questionnaires.

10% of responses were from residents under 30 years, 47% were residents over 65 years.

The group devised worksheets for the lower school (such as design a house you would like in the Parish) and what they would like in the area, though the comments back were somewhat unrealistic, they were added to the plan to show community engagement of all ages.

They did have difficulty capturing families, but did go to the toddler groups and other places families may be present.

Northhill had £15k of grants and were advised by CBC that a total realistic cost guideline would be £15-20k. At present the costs are £16.5-18.5k with no further expenditure predicted.

This cost was mostly spent on publicity, room hire and website design.

They utilised a student to work on the website.

When asked if there was any evidence in the plan to compare against national statistics Helen commented that it was difficult to compare people not wanting housing.

CBC carried out work on the questionnaire design and analysis and everyone in the village received paper copies sent out with pre-paid envelopes.

Each individual focus group went out and obtained the evidence required for their focus group.

Northhill's policy was to see developments of 10 houses or under, but a builder put in a development of 21 and then reduced to 10 (as per Northhill NP guidelines). CBC then said no – put in 21, therefore the assumption that NP works may be difficult to assess judging on this experience.

When asked how Northhill increased participants, she said they Chivvied people up – went to local clubs and groups and contacted as many people as possible to fill out a questionnaire/provide information,

When questioned why community health is not mentioned in the Northhill report, Helen said they did not have any facilities and there was no weight on evidence mentioning this.

Helpful insights

Helen provided some thoughts from the Northill Group on things they would do differently or particularly commented on:

- Suggest getting in sync with CBC local plan timelines (i.e. Northill is 2016-2031 and now CBC in to 2035).
- An ACON report (a report on nrs of housing and housing need surveys) can be carried out by BRCC – They were told this would take 4-6 weeks to do and the draft took 6 months. – Suggest we do this asap.
- Ensure report is compiled in word format (Northill had there's in a nice layout but proved difficult to alter with having speech bubbles etc)
- Keep information into an auditable format so everything is easily referenced (reference everything)
- Keep numbering simple
- Try to get people on the group who are both willing and have different skills, report writing, data analysis etc
- Ask CBC if a Strategic Environmental Assessment is required and if so obtain.
- Get the report checked over (a health check) before sending off to inspector – Cost approx. £900 – Tom Price will know contact details.
- If issues come up as you go along – pass to PC (a lot of issues that arise are not part of NP so don't get bogged down with it)
- Don't take too long to do it – i.e. get on with it
- Ensure report covers main issues and make inspectors job as easy as possible.
- Try to not have too much unnecessary information and keep pages to minimum.
- Don't use high resolution photos
- Have someone to keep tabs on what's going on
- Be briefer than Northill were on topics and introduction – cut the pre-amble down – the Inspector knows what a NP is.
- They used consultants from the start and were taught by the Princes Trust on running workshops.
- They obtained assistance from Alison? Who wrote most of the housing. She approximated cost of consultancy at £3-4k.
- Neighbouring parish consultation was only answered by Biggleswade as - no comment.
- She was advised that apparently you can choose which inspector you want to have inspect your NP?

Update on Questionnaire

- Ant advised that he/Dave had been to Ivy leaf welcome club but that did not prove successful as they were informed people want to go for coffee and not for completing questionnaires.
- Perry had sent details to Henlow and SWA who had put in their newsletters and was happy to do more work with them to capture youth views.
- Dave had put in local businesses and also some in Biggleswade
- Michelle said she had given details to Methodist Chapel and St Andrews Church
- Completed questionnaires to date was good at 200+
- Suggested posters be put up at Train Station

Further campaigning

After members of the group commented that they were concerned many residents were still unaware of the NP discussion took place on heightening the campaign by doing leaflet drops to all homes.

It was suggested to boost the campaign and it was agreed to purchase 2nr banners to put up (Ant to order) and do a leaflet drop to all houses in the village (estimate £100 for delivery). Michelle would draft and get printed.

Helen said she would be happy to go in and talk to the lower school on suggestions to work with the younger group for them filling out questionnaires

All the Group were encouraged to email their friends and families to complete the questionnaire

It was agreed that the date for completed questionnaire can be extended, and suggested a two week further extension.

Any other business

No other business

Date of next meetings:

Thursday 13th December – 7:30pm – Review response/outcome of questionnaire

6.4.2 Evidence from the local community

In September and November 2018, flyers were included within the 'Village Diary' These are shown below.



A Vision for Langford

Many of us in Langford have concerns and ideas about the future of the Village!

e.g. how big do we want the village to become?
What about school places and nursery provision?
How much traffic can we cope with?
Do our green spaces need better protection?
Should we have better leisure facilities? etc.

Social media and the local press are popular forums to air these types of concerns but often results in little being done.

Well, now everyone in Langford has the opportunity to put forward views and to be heard. A group of residents have formed a steering group to develop a **Neighbourhood Plan for our village.**

Neighbourhood Plans are being created in communities across the country and are backed by government (through the Localism Act, 2011), local authorities and parish councils. Critically, when a Plan is approved, the recommendations within it must be taken into account when investment and major planning decisions are taken that affect the local community.

The national policy states that:

"Neighbourhood planning gives communities direct power to develop a shared vision and deliver the sustainable development they need".

The overall aim therefore is to create our own vision for Langford, within a Neighbourhood Plan, with detailed proposals to support that vision.

In Langford this process has just begun and the most important principle is to gather the views of all residents - adults and children - who wish to contribute.

To kick things off the steering group has chosen four themes to explore and consult on:

Transport, Planning, Environment and Infrastructure (services, schools, shops etc).

But these are not yet fixed and will be influenced by what residents want for the village. The project will take time and the final draft Plan will, in due course, be put out to everyone in Langford to vote on.

What kind of village do you want Langford to be?

Please send your initial comments and suggestions to:

langfordneighbourhoodplan@gmail.com

The first stage of the LNP development required us to find out the views and opinions of residents on a wide range of topics and this was done by the creation and circulation of a Questionnaire. The Questionnaire was publicized via the "**We Love Langford**" Facebook

page, the **LangfordNeighbourhoodPlan.org.uk** website, posters in prominent positions in the village, two leaflet drops to every household, banners on the railings at the playing field and at the junction of Church Street, High Street & Station Road, requests to the organizers of village societies and finally by personal interviews at The Morning Coffee Shop held every Friday in the Church Hall.



Langford Neighbourhood Plan

The Langford Neighbourhood plan is being drawn up by village residents to define a future vision for Langford.

We would like all residents of our village to have the opportunity to say what is important to them.

Please fill out the questionnaire on our website
www.langfordneighbourhoodplan.org.uk

If you need assistance please email:
langfordneighbourhoodplan@gmail.com
or contact

the **Langford Parish Clerk on: 07482 276173**
(paper versions of the questionnaire are available on request).



Website
QR Code

Have your say!



Questionnaire
QR Code

441 households responded, which represents 35% of the population (2011 Census). We were very encouraged by the detailed (in excess of 2,500) comments and suggestions in the responses and the obvious commitment of many residents to the future of the village and to

the LNP. Some of these comments are quoted within the text of this and other documents comprising the LNP.

https://docs.google.com/forms/d/e/1FAIpQLScMlf-av627yRZh37LuPNS9wR-bU4VdF0H_YV4maQCBwckcgg/viewform

The findings of the data captured by the questionnaire can be found in Appendices 6.4.3 and 6.4.4.

Additional evidence concerning the views of the local community were also gathered:

- through e-mail communications (July 2018 to July 2019);
- requests for information placed on the Langford Facebook page, in the Langford Diary and The Villager;
- through a Housing Needs Survey (May 2019);
- at the Langford Fete (6 July 2019);
- through a Design Codes survey (December 2019) conducted through an on-line app (PlaceCheck);
- other significant 1-to1 and group events such as a Christmas Fair, Meet & Greet sessions, tidy-up days, meetings, workshops, drop-in events and school visits.





Evidence from local businesses

Businesses based in Langford were identified by a combination of personal knowledge; referral to village and local publications (e.g., advertisers in The Langford Diary, The Villager, Langford Cricket Club) and internet searches.

A focussed 10-point web-based questionnaire was developed to capture the views of business owners on key issues about their business and their future plans.

<https://docs.google.com/forms/d/e/1FAIpQLSdmTPKLL4pj3CA54PoiNfIbLISb6qqk7CT3twmB9wpOSIVICw/viewform>

A mixture of personal visits, letter drops, email contacts and features in local social media were used to make business owners aware of the Neighbourhood Plan and of the need for their inputs and the benefits to the integrity of the Plan.

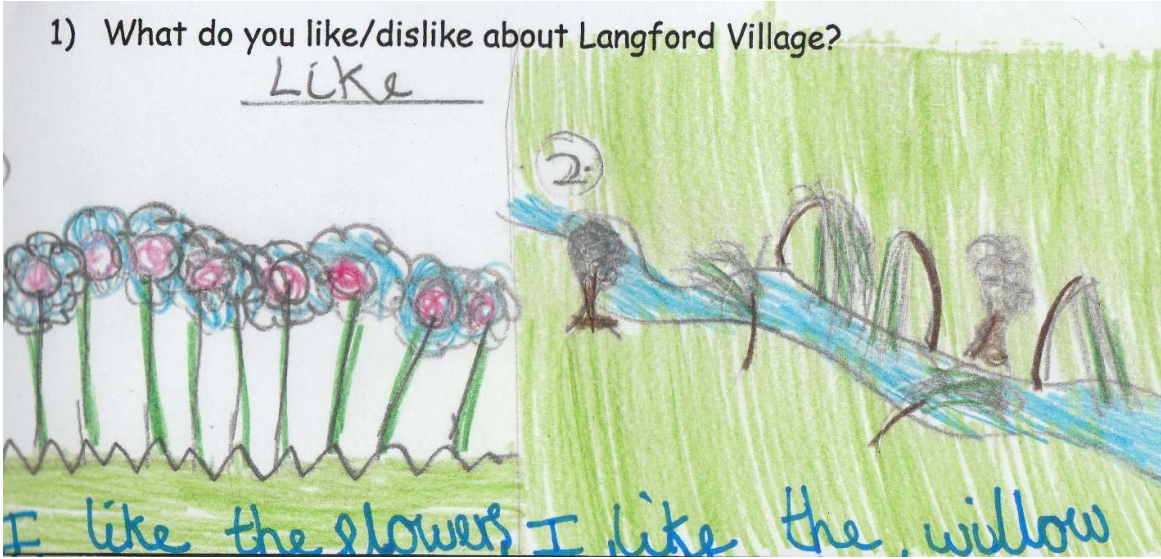
The questionnaire remained open for responses between March and September 2019. The results of responses can be found in Appendix 6.4.5.

Evidence from school, clubs and organisations

During April and May 2019, a number of clubs and organisations that operate within Langford were contacted by members of the LNP Steering Group and asked to contribute any additional comments in respect of the four focus areas for the neighbourhood plan i.e.,

Environment, Transport, Planning and Development and Infrastructure. It was emphasised that the comments were from the club/ organisation perspective – what aspects would help the organisation thrive for the benefit of Langford and its residents in the future?

Respondents are listed below - 20 in total with a total estimated attendance in excess of 500 with about 60% being in the older retired age groups but with significant numbers of younger people involved in schools, cubs, beavers, scouts and sports clubs.



Beavers	Scouts	Cubs	Cricket
Bowls	Walking Group	Cycling Group	Langford Friends
History Society	Welcome Club	Women's Institute	Ivel Sprinter
Methodist Chapel	St Andrews Church	Yoga	Oasis Coffee Shop
Morning Coffee Shop	Ballroom Dancing	Langford Lower School	Henlow Church of England Academy



The responses were analysed to identify key themes and a summary of the findings can be found in Appendices 6.4.3 and 6.4.4.

Evidence from other stakeholders

It was also important for the Plan to encompass views of key stakeholders in the consultation process and contact was made with Neighbouring Parishes & Town Councils, Community Safety Team (Bedfordshire Police) and the providers of the health provision servicing Langford.

Members of the Steering Group also made contact with utility companies servicing the village in order to identify threats to and opportunities in the services they provide.

The group reviewed and analysed the representations made from all consultations and where relevant incorporated these within the data, statistics and policies of the Plan.



Appendix 6.4.3 LNP Questionnaire: Summary Feedback for Villagers



Responses to the Langford Neighbourhood Plan Questionnaire November 2018 Summary Feedback for Villagers



LangfordNeighbourhoodPlan.org.uk



[WeLoveLangford](#)

Introduction

The purpose of the **Langford Neighbourhood Plan** is to create a vision for the parish and to give guidance in the planning process and in the many other factors that are impacting upon our village. Neighbourhood Plans are the result of a Government initiative to devolve decision making on local developments and as such should reflect the views of the village residents, whilst being consistent with national and local planning policy, the latter being set by Central Bedfordshire Council (CBC). There is currently no CBC Local Plan and, in the absence of a Langford Neighbourhood Plan, which we are currently working on, there is little or no hindrance to incoming developers with sometimes inappropriate plans.

The Neighbourhood Plan is being developed by the Steering Group, made up of interested volunteer residents and some Parish Councillors.

The first stage of the Plan development required us to find out the views and opinions of residents on a wide range of topics and this was done by the creation and circulation of a Questionnaire. The Questionnaire was publicised via the "**We Love Langford**" Facebook page, the LangfordNeighbourhoodPlan.org.uk website, posters in prominent positions in the village, two leaflet drops to every household, banners on the railings at the playing field and at the junction of Church Street, High Street & Station Road, requests to the organisers of village societies and finally by personal interviews at The Morning Coffee Shop held every Friday in the Church Hall.

415 households responded, a number well in excess of our early expectations. We were very encouraged by the detailed 2,500+ comments and suggestions in the responses and the obvious commitment of many of you to the future of the village and to the Plan.

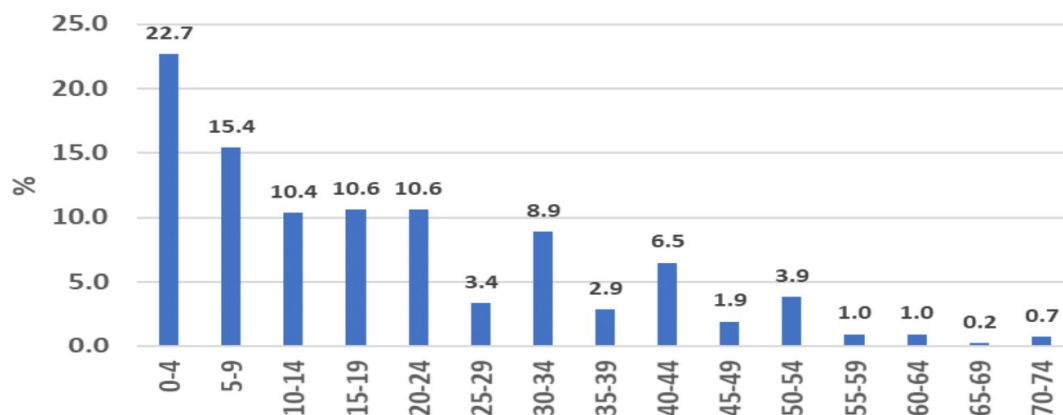
***441 households
responded to the
questionnaire,
representing 35% of
Langford*** (2011 Census)

Questionnaire findings

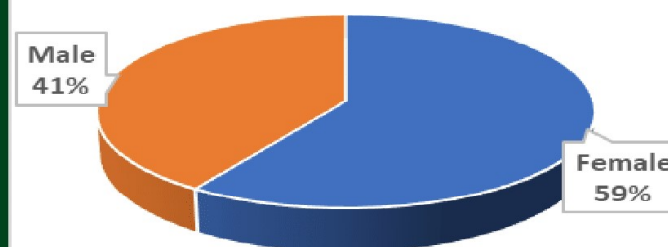
There was a good distribution of responses from all areas of the village representing a cross-section of residents. We do however, need to gain more input from our younger people so we can better represent their views in the final Plan.



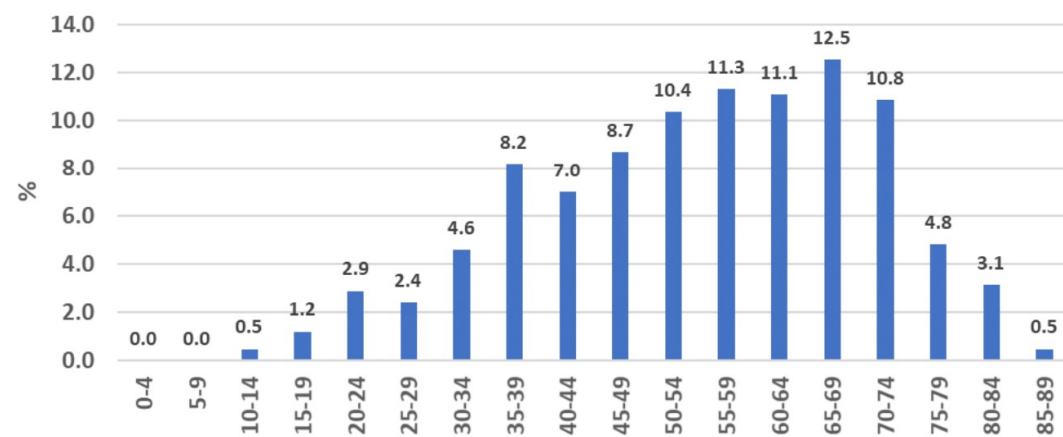
Respondents years residency in Langford



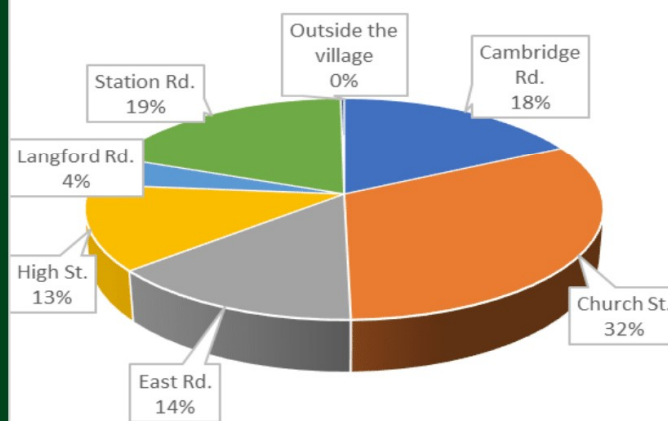
Respondents gender %



Respondents age profile



Respondents location %



"More open spaces and support for wildlife and less new building"

"Youth club/coffee shop for teenagers/young people - a safe hub for them to talk, chat, meet friends and enjoy a nice atmosphere away from the stresses of life and pressures of school"

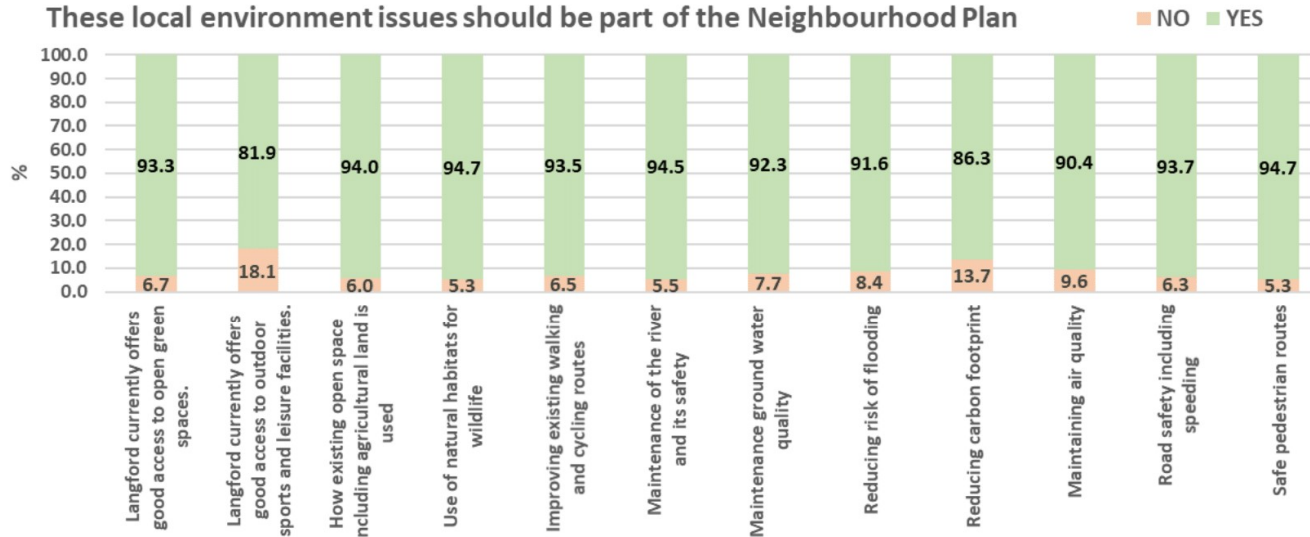
Environment

There was a strong appreciation of the environment in and around Langford and for the outdoor sports facilities, with a desire to protect and enhance the green spaces.

The responses showed a wish for more cycle paths and for a proper riverside path from Langford Mill to Jordans Mill. Concerns were expressed about all the issues that impact upon the village environment from flooding to a perceived rise in crime and anti-social behaviour.

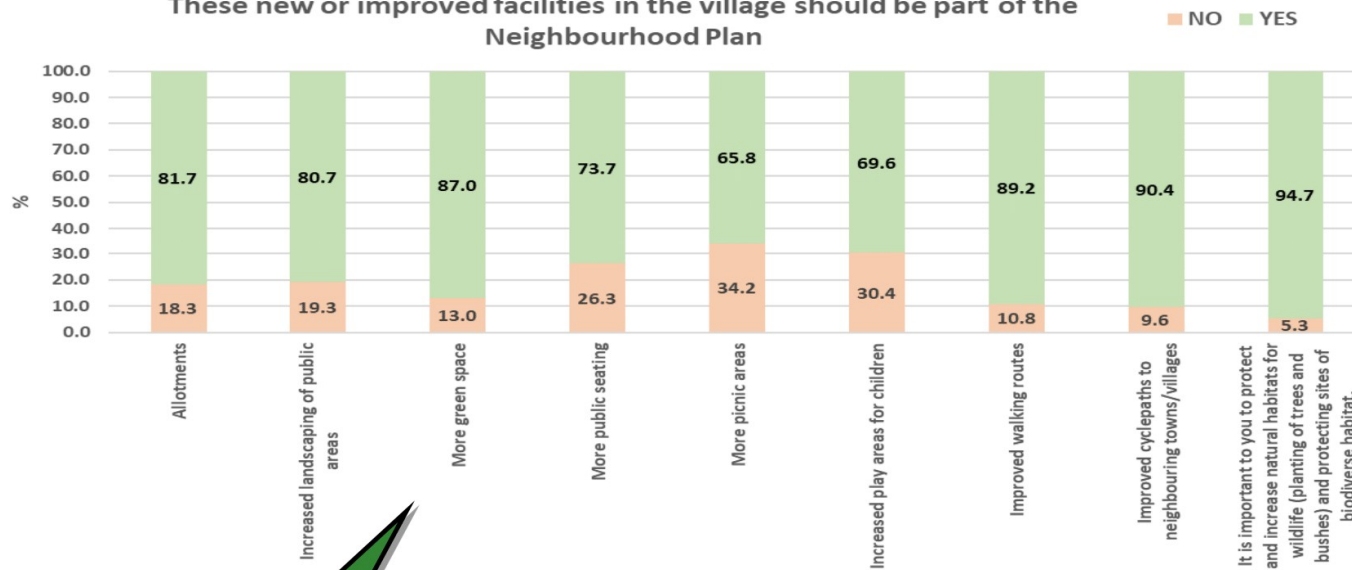
"Langford is no longer a safe place to live"

These local environment issues should be part of the Neighbourhood Plan





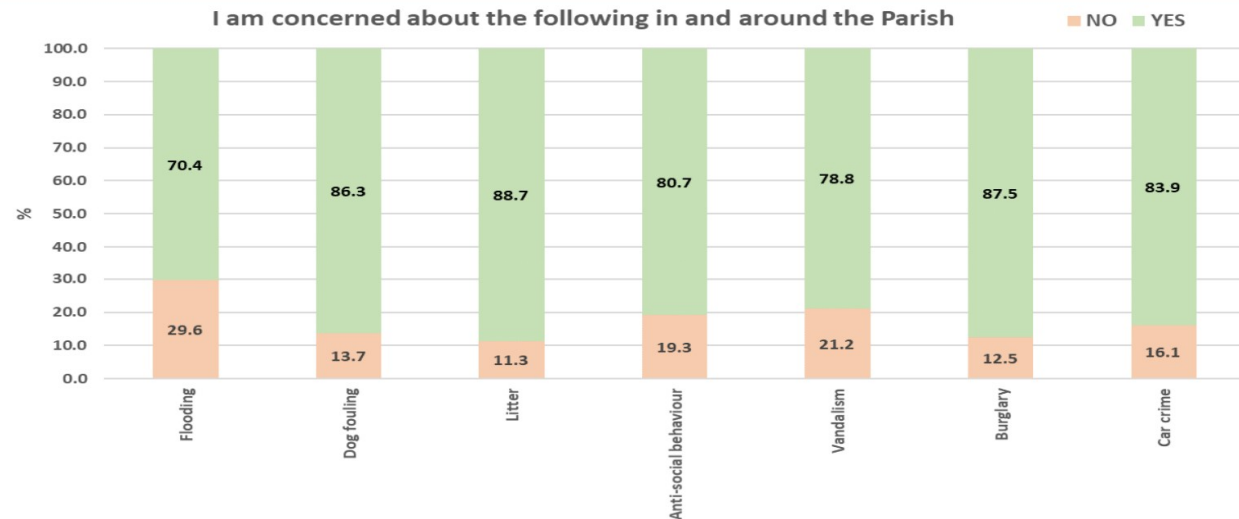
These new or improved facilities in the village should be part of the Neighbourhood Plan

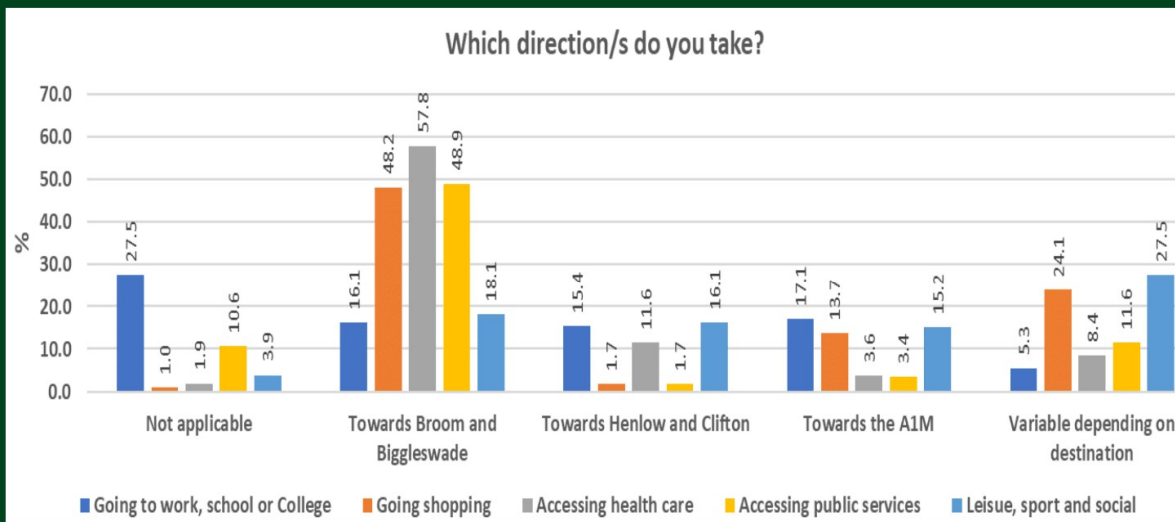


“More well signposted footpaths & cycle-ways

“I’m worried about loss of open space and the damage to natural habitats”

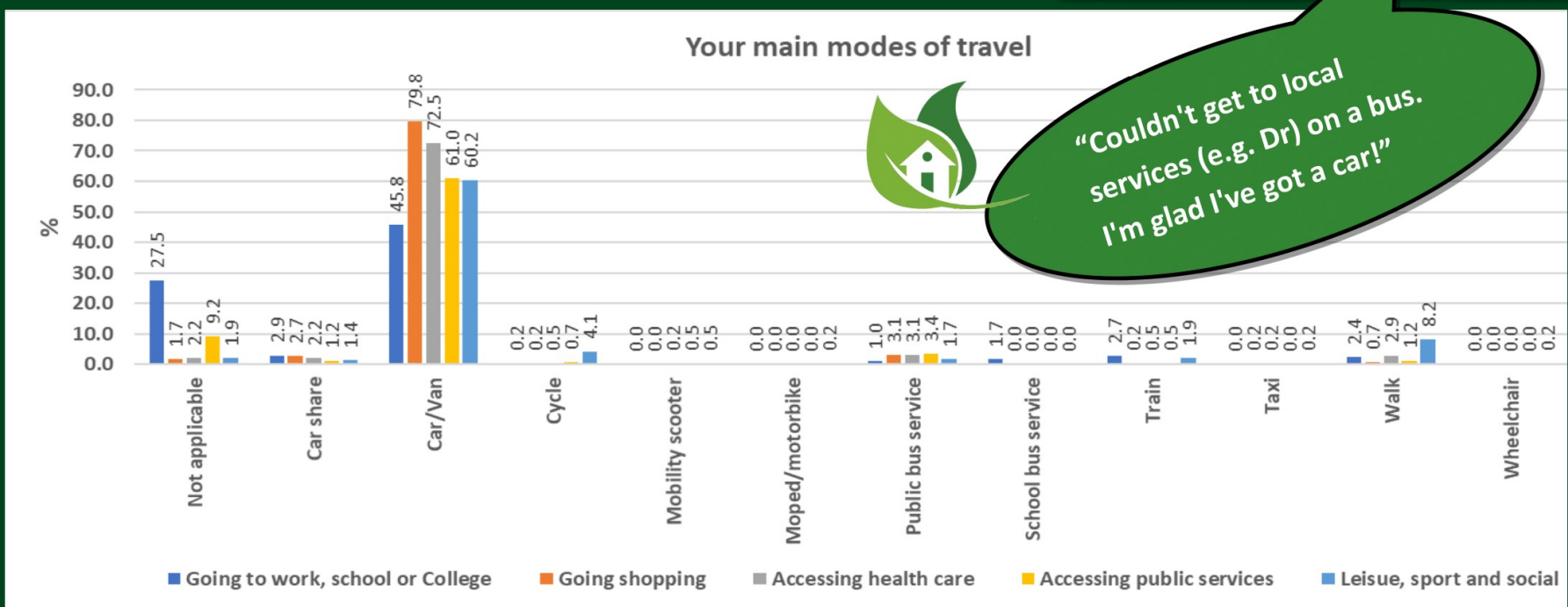
I am concerned about the following in and around the Parish

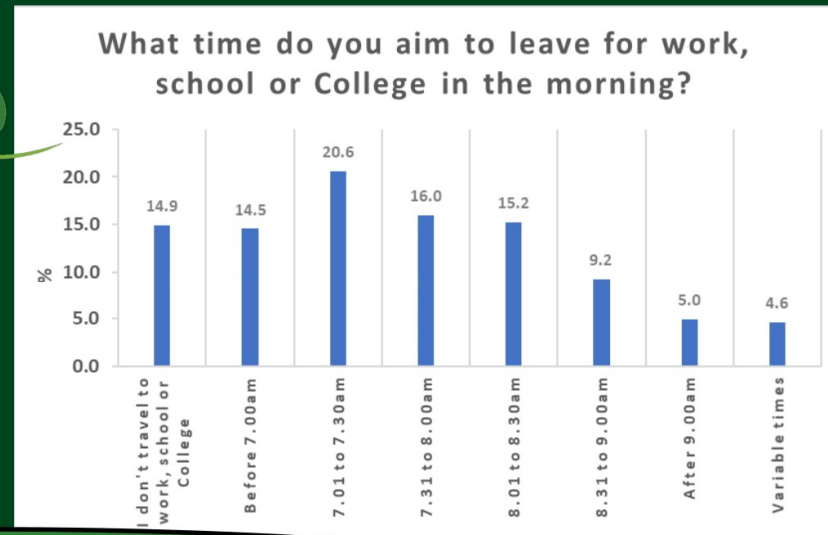
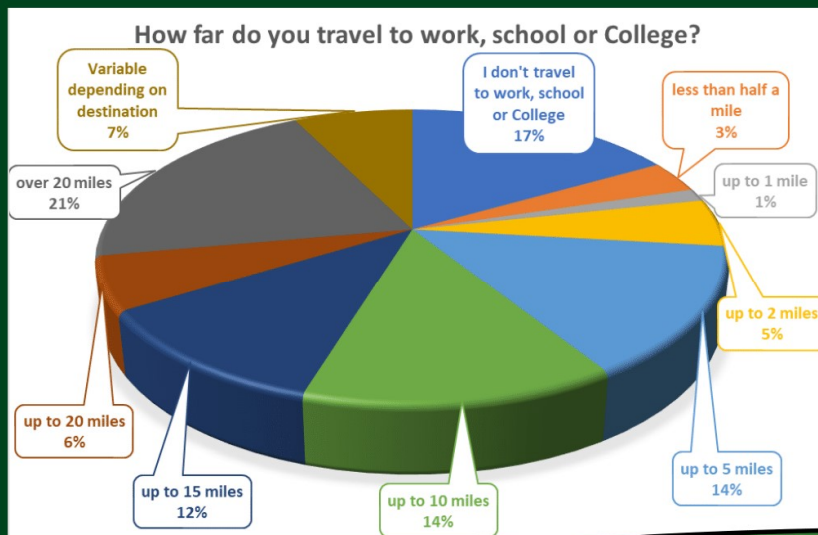




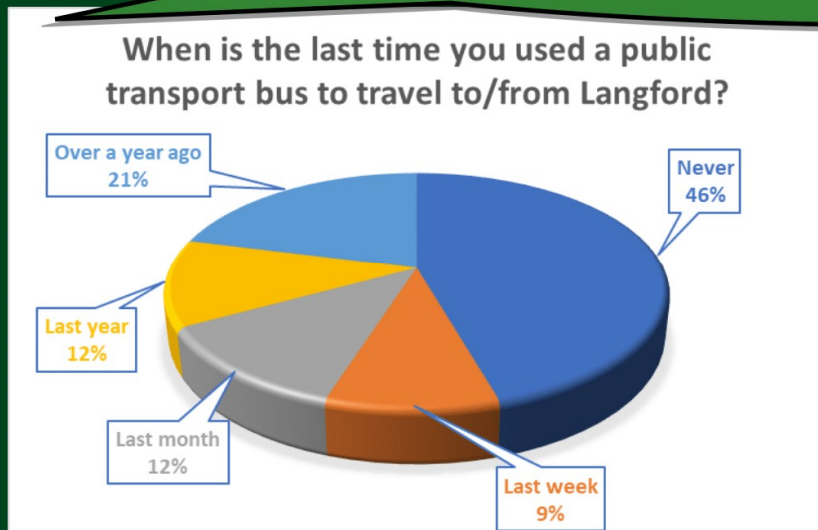
Transport

On travel, it may come as little surprise that the overwhelming majority of journeys (80%) to and from the village are by car or van. 67% of respondents had never used a bus or last did so over a year ago and very similar numbers applied to bicycle use. 75% thought the bus service to be either poor, very poor or not applicable to them, with the lack of evening and Sunday services being pointed out. Taxi services for the village were also thought to be poor. Road and pavement conditions were another major concern, as was on-road parking.



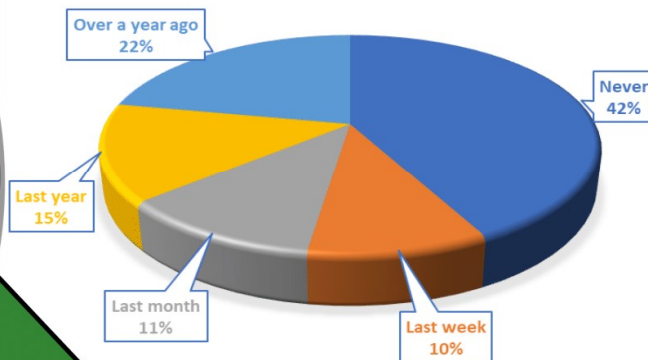


"I work in Letchworth there is no bus from Langford. No evening buses to Hitchin or Henlow so can't use buses for eating out or leisure"

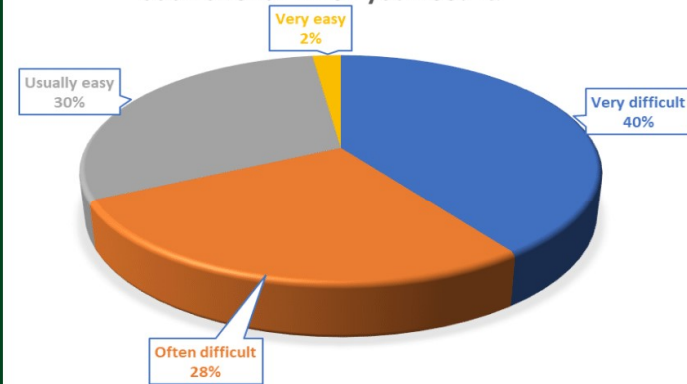


"I don't feel safe cycling with the volume and speed of traffic especially between the village and Biggleswade, the A1 or Henlow "

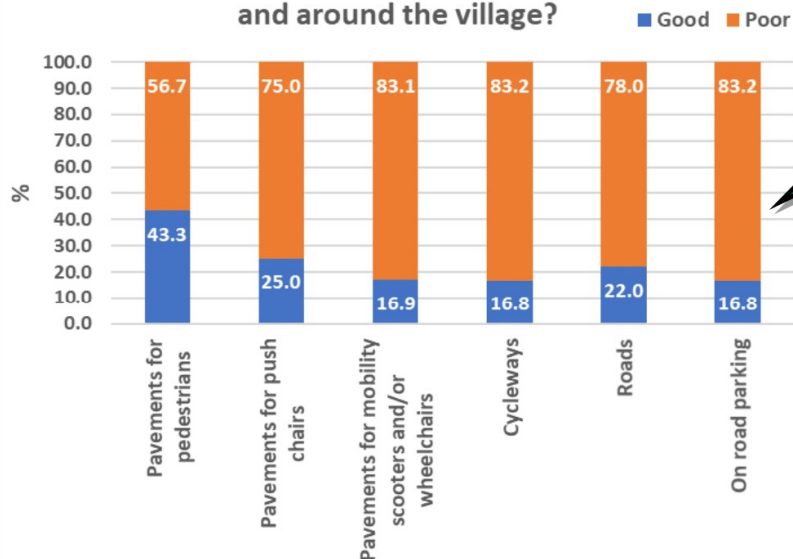
When is the last time you travelled to and from Langford by bicycle?



If you use taxis, please comment on how easy it is to book one for when you need it.



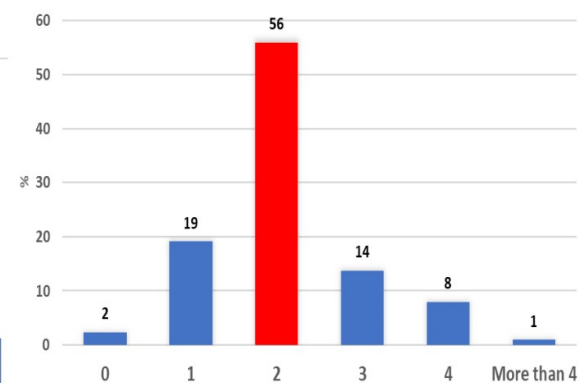
What do you think is the condition of these in and around the village?



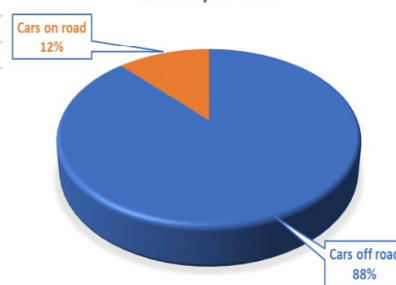
"New housing to have sufficient car parking to avoid on road parking "



How many cars are used by members of your household?



Cars off/on road



Infrastructure

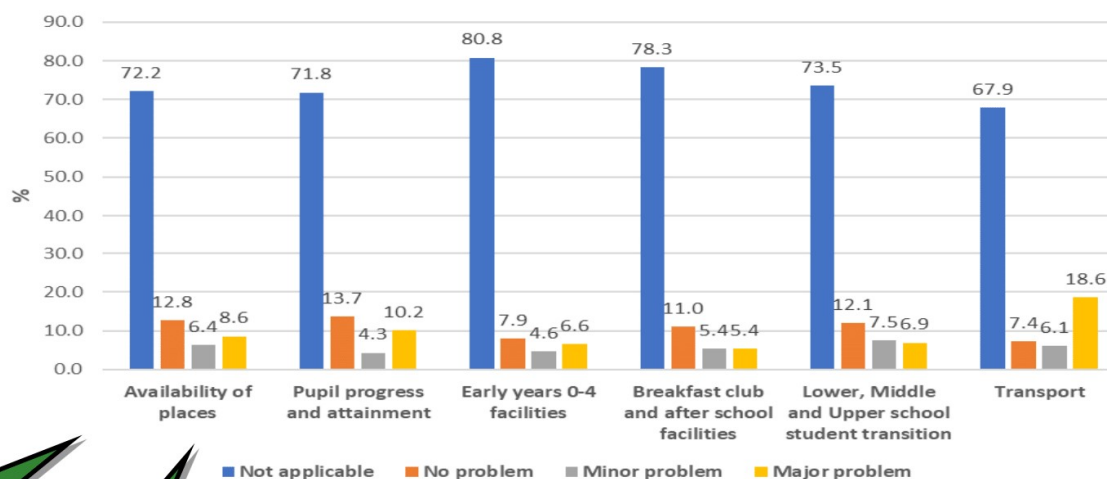
Infrastructure questions highlighted wide concerns on supporting the growing village with the essentials of sewage, drainage and power. Access to GP services and dental surgeries also featured in the replies. The responses about access to fast broadband showed a 3-way split between it being a major problem, a minor problem and no problem at all, perhaps suggesting that there are parts of the village for whom fibre is not an option due to availability, cost or both. Although the sporting facilities in the village were thought to be good, there was a wish for more leisure facilities for our teenagers and in general for more pub & restaurant options.

"Bad traffic outside the school at school times: unpleasant, unsafe, air polluting"

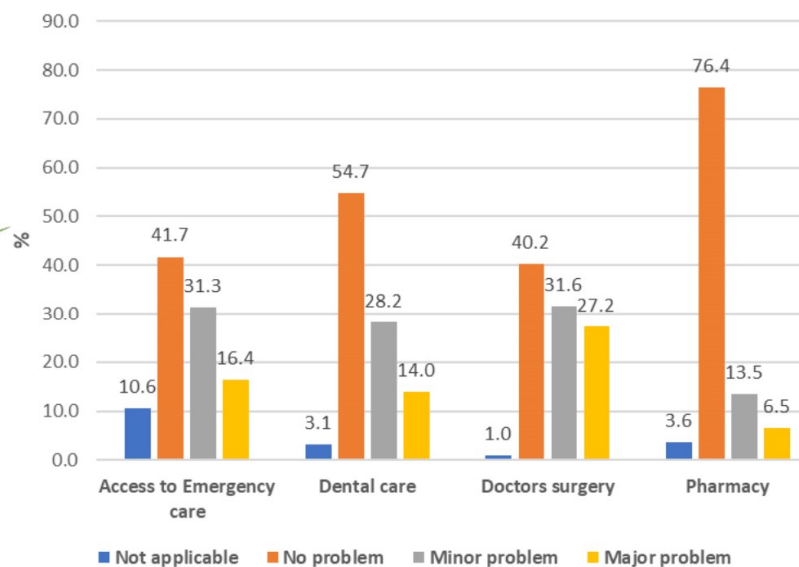
"Should promote active travel to school by protected bike & walk ways, 20mph throughout, perhaps 'bike trains' or 'walking trains'"



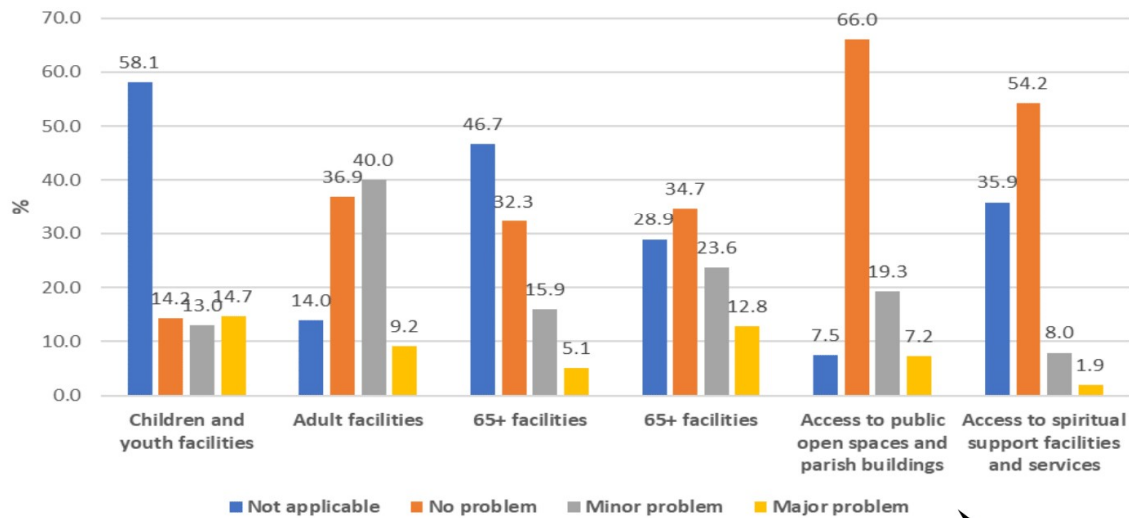
School issues



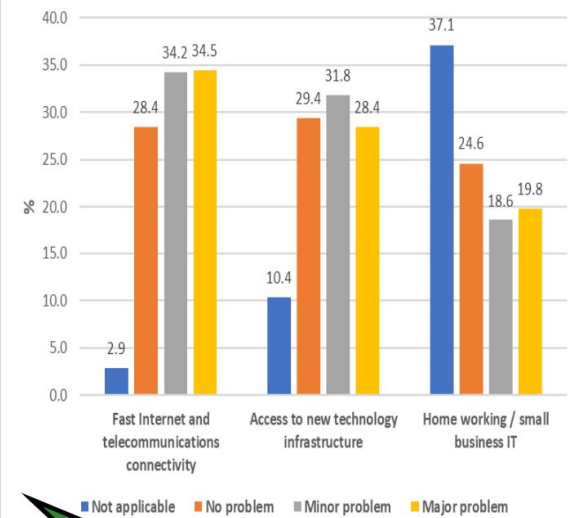
Health Care issues



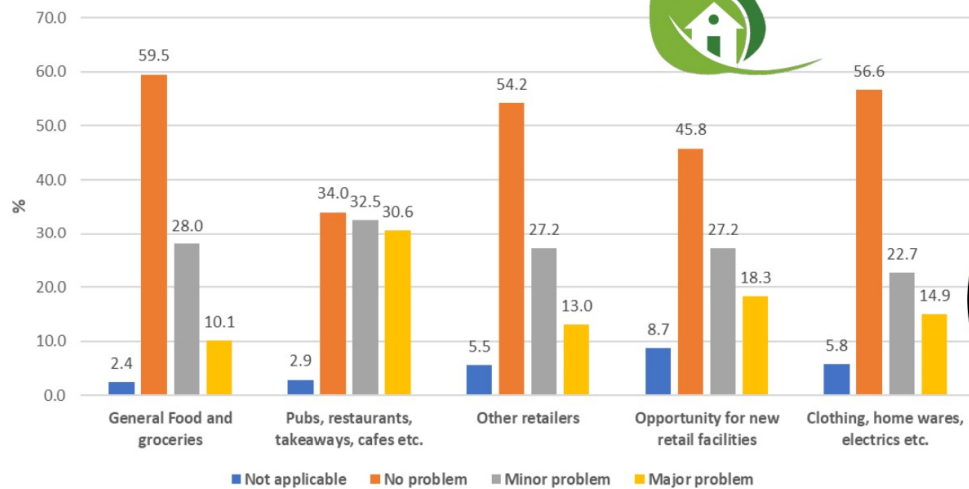
Leisure issues



Technology issues



Retail issues



"Too many outages of electricity supply"

"More indoor facility's for ADULTS plus 14+ year olds . Everything is aimed at young children then we complain when teenagers/young adults are getting bored and causing trouble"

Planning and development

Probably the hottest current topic in the village, with new applications being submitted on a very regular basis (another 608 new dwellings planned in the village that we know of). 69% of the respondents wanted less than 100 new houses to be built in the next 20 years, with another 12.6% wanting no more than 101-200 in that time. There were strong preferences for 1-2 and 3-4 bed homes to be built rather than 5 or more bedroom types, with a desire for more bungalows also becoming clear.

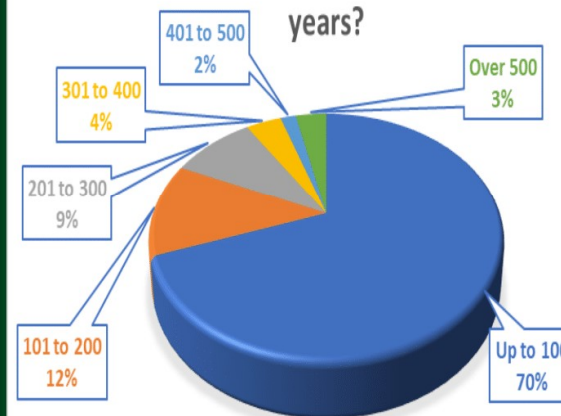
Your strong preference was for small developments

in the future, of no more than 10 houses - each of which should have a garden, off-road parking and energy-efficient designs.

Over 90% wanted local residents to have priority for affordable houses in the village and over 92% wanted no new developments on roads which are narrow and / or dangerous or with access near existing junctions. 71% of you wanted the current Settlement Envelope of Langford to remain unchanged.

The wish to "keep Langford a village" came through from you loud and clear.

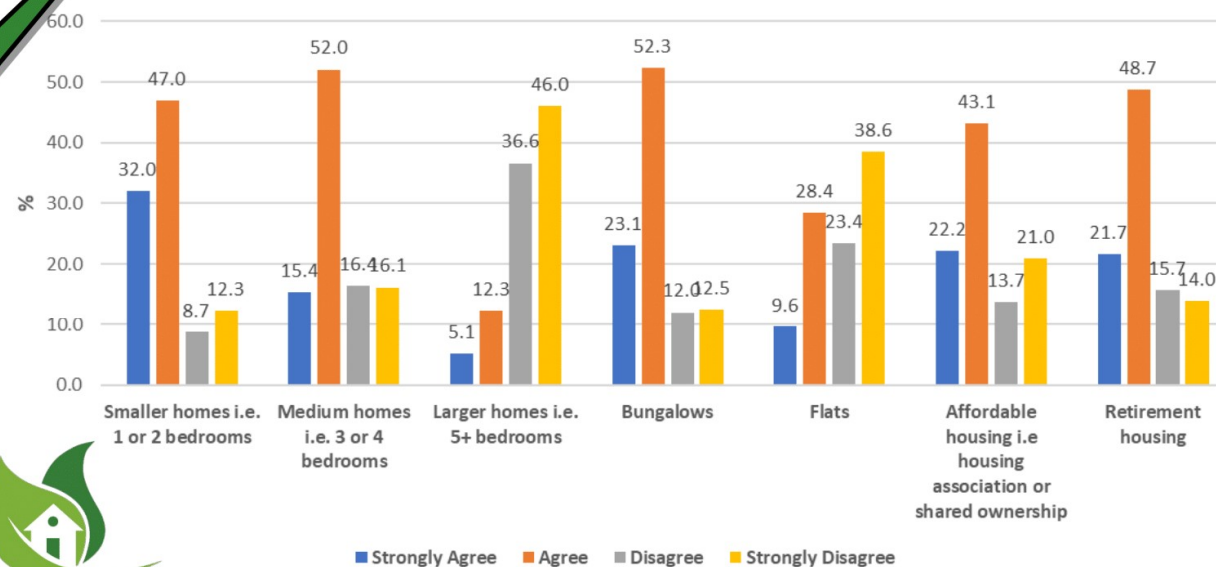
How many new homes in the next 20 years?



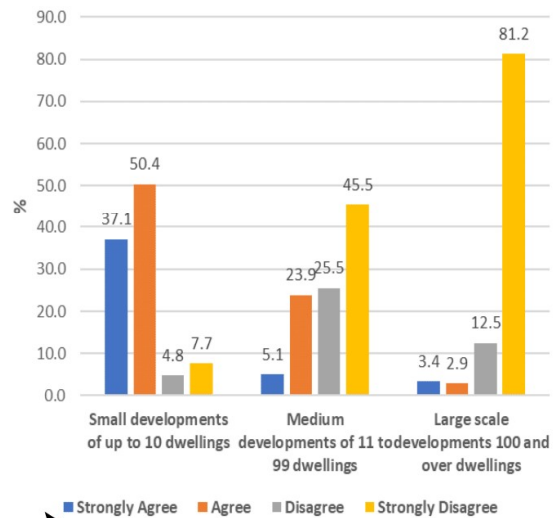
"No longer a village, small town without facilities"

"We need some proper planning vision"

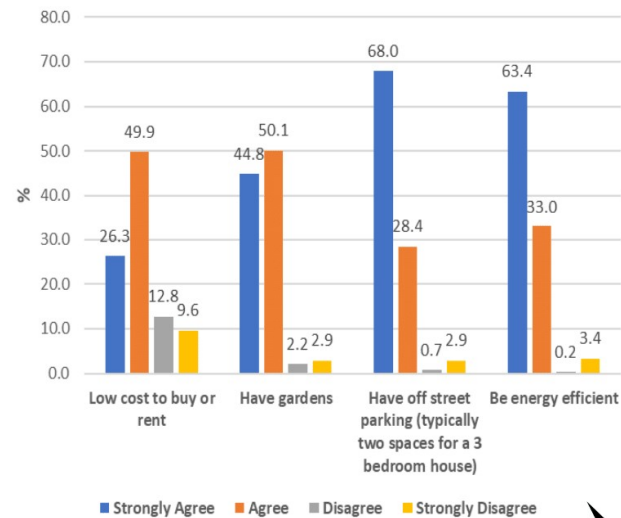
Type of new housing



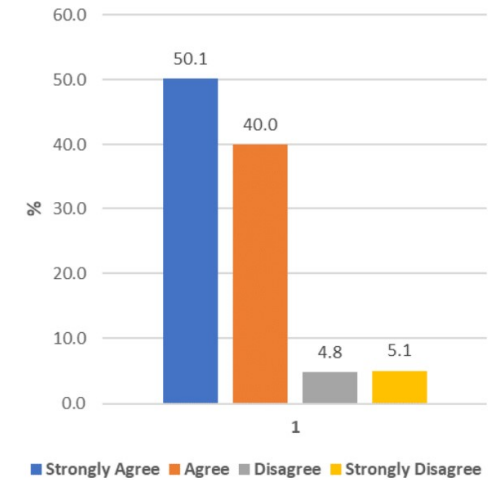
Size of new housing developments



Houses in new developments should be:

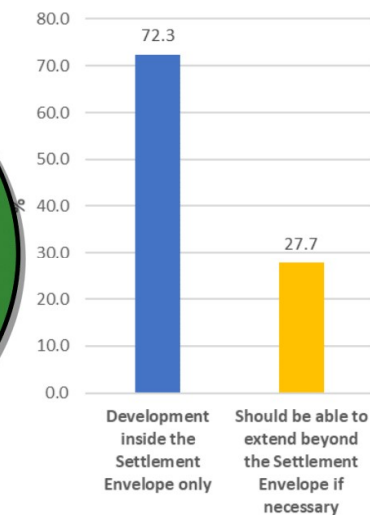


Local residents should be given priority for affordable housing



"It's a nice place to live, but it's no good pretending it's a small rural village any more. It's too close to London for that now. We have to ensure we don't spoil the good aspects of it, both for existing and new residents"

New development area



"We can't trust building developers that need to achieve maximum profitability."



The next steps

You overwhelmingly agreed that the four themes in the Questionnaire: **Environment, Transport, Infrastructure and Planning** should all be taken forward into the next stages of the development of the Neighbourhood Plan, with the strongest agreement being for Infrastructure and Planning. It was also very encouraging that you also raised other important issues, such as law enforcement, which are being fed back to the Parish Council, the appropriate body to address these concerns.

The Steering Group will further analyze the responses and the very many comments you submitted. As stated above, we will try and get more inputs on the views of the children and teenagers in the village so the Plan can better reflect their views. We also need to get the opinions of local businesses and landowners as well. If you can help us in getting these thoughts please contact us.

To date, the Questionnaire and publicity has been funded by Langford Parish Council. There are funds available from Central Bedfordshire Council to support the production of our Neighbourhood Plan and we shall be making an application for the year starting April 2019.

More detailed feedback will be given in due course & we will continue to inform & consult villagers as the process continues. It is a legal requirement that the final Plan is put to a vote in the village, with your approval needed for the Plan to be officially adopted.

It is very much our hope that the Langford Neighbourhood Plan will provide a better structure for the future development of the village and that it will reflect the views of our community. If you'd like to be involved and contribute to this important work for Langford, please contact us.



Finally, our thanks to all those who've submitted their views. You can keep up to date with progress via:



WeLoveLangford



LangfordNeighbourhoodPlan.org.uk



michellealbone.langfordpc@gmail.com



07482 276173

Appendix 6.4.4 LNP Questionnaire: Analysis of Comments

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Methodology

The comments were obtained as part of the questionnaire seeking to provide evidence in relation to the Environment, Transport, Infrastructure and Planning themes of the questionnaire. There were 389 responses to the questionnaire and a total of over 2500 comments received over the four categories. The opportunity to comments was intended to cover aspects not included specifically in the questionnaire and allowed for emphasis or clarification.

The comments were collected, reviewed and grouped to identify common themes and additional suggestions. This was done mainly by the one member of the steering group but

other members of the steering group were asked to read the comments and confirm that the themes identified were reflective of the comments received.

Environment

Access to green spaces, sport and leisure

Respondents were asked if there was anything more would you like to see? E1

- **Current level of amenities**

There were general comments that expressed satisfaction with the current position:

"The village seems to have good facilities for sports & leisure"

But an opposite view was expressed that with the growth of the village more amenities were needed.

- **Maintenance**

Keep what we have was another comment along with a view that maintenance of the current facilities was required

"Better maintenance and retention of what we have".

"More regular maintenance of footpaths"

And a comment for security cameras in the park to prevent damage to equipment

- **Community gatherings/socialising**

There was a call for more opportunities for community activities

"Some sort of a central community hub"

This was also reflected in the call for a village pub/ restaurant.

And for support for the existing facilities

"More support for our local centres i.e. the plough, ivy leaf"

"More people volunteering to run the sports & leisure facilities"

- **Young people / teenagers**

Facilities for teenagers was seen to be lacking with a call for more organised/supervised activities.

"Something more for teenagers maybe a youth club"

And reflecting concern about the increase in mental health issues amongst young people and relating to the lack of facilities for young people apart from gym equipment and sports facilities:

“e.g. youth club/coffee shop for teenagers/young people - a safe hub for them to talk, chat, meet friends and enjoy a nice atmosphere away from the stresses of life and pressures of school”

- **Dogs**

There were comments reflecting the need for dog owners to be better at clearing up their dogs mess, but also for more dog poo bins and increased dog wardens.

A dog waling area was also suggested.

- **Play areas**

More play areas, open spaces for play and play equipment were included in comments and also at an appropriate location

“More play areas for younger children at both ends of the Village.”

- **Sports facilities**

The following were suggested:

- MUGA (multi use games area)
- More football pitches
- Separate cricket pitch away from the playing field
- Full sized netball court
- Signs to indicate availability of fishing on river
- Tennis court free to all
- Indoor sports facilities
- Local gym
- Develop the skate/scooter area (well-lit and positioned to avoid anti-social behaviour and encourage wider use)
- 5 side pitch

- **Cycle routes and footpaths**

More and better maintained footpaths and cycle routes were called for. Specific locations given included:

“Foot path close to east side of railway between East Road and Edworth Road”

“Better cycle path linking Langford to Henlow”

“Keep footpath along the river clear particularly the big from Langford to Broom Mill.”

- **Green and open spaces**

The need to protect the current green space provision from any further developments but also to increase the availability and access

“More open spaces and support for wildlife and less new building”

“Protection of existing green spaces in their entirety”

“Better access to riverside”

“Access to more open spaces and less cordoning off of areas for specific interests”

Green space protection

Open space protection

Respondents were asked to identify areas of open space in Langford not already protected that you feel could be given local green space protection in the Neighbourhood Plan? (E2)

- Comments included the general view that any current open space should be protected.

“All areas of open space in Langford not already protected should be given local green space protection in the Neighbourhood Plan”

“Anywhere that houses a variety of nature and places for children and families to enjoy”

“Anything green!”

- With more specific mention of the land surrounding the village to prevent merging with Biggleswade and other villages

“to maintain separation from Biggleswade and overdevelopment of the village”

- And the land around the river and the water meadows

“land west of the Mill, adjacent to the river and navigation”

“Land between Wrestlers and river: All areas between High Street/Church Street and the River Ivel”

“riverside areas”

- Specific areas mentioned included:

“Land behind loft farm”

“Fields that back onto rail track behind church street and to the left of east road”

“area between Langford Village and railway”

“The green space between High St, Station Road and Cambridge Road, the remains of the Triangle”

“St. Andrew - instead of the planned development”

“Plot of land by Tithe Farm Close”

“More protection for the lovely walks off Common Road”

Other environmental factors

Respondents were asked if there are any other environmental factors that are important to you, E3.

Comments were received in relation to housing developments, traffic and access to green spaces that have been included in other sections of this report.

Specific mention was made in relation to:

- **Sewage smells** around the corner of Cambridge road and the pressure on this infrastructure with further developments
- Concern about **flooding** and in particular in station road, but also in relation to building on the flood plains . There was also a comment concerning rain water runoff from fields affecting some residents
- **Noise levels** – from increases in traffic and HGVs and from the flight path to Luton Airport. Also noted was noise from dogs being left alone all day as well as noisy exhausts of boy racers. Pub exit time was also commented on as being noisy.
- **Air pollution.** Volume of traffic and HGVs but also running car engines in static traffic and when waiting outside school.
- Monitoring and improving **biodiversity**
- **Recycling:** ie a local glass/bottle bank; *“becoming a more eco-friendly village “
“ where are elderly people without cars expected to recycle their jars & bottles??”*

And if there were any other facilities that are important to you, E4 E5

- **Ease of access for those not in vehicles:**

Overgrown and poorly maintained paths has already been commented on – but the movement of those with buggies, disabled scooters and cycling could be better addressed as in following comments

“Pavements that allow for safe crossing points and ease of passage for pedestrians, wheelchairs, disabled buggies, sight impaired, pushchairs i.e. good surface, trimmed hedges, no parking overlap, dropped curbs etc.”

“wheelchair accessible routes”

“with the roads become so busy in the village it is daunting for someone who is disabled/elderly venturing out on their own and having the confidence and capability to cross the roads quickly enough and unaided; especially on the stretch of road going out of the village after East Road (near the bus stop) - meaning they could lose their independence”.

“Split motor vehicles away from cyclists”

- Maintaining **access to farmland** for walkers
- Need the council to fit **more 20mph sign** along church street. The signs are not clear enough
- Access to neighbouring **open water** for canoeing or sailing
- More street **lighting**
- Non-existent **policing** in the village
- Provision of **more trees** where possible. Landscaping should use native and wildlife friendly planting. TPO's (tree protection order) should be obtained for mature trees at the ford, playing fields and other locations.

- **Fly tipping and litter and rubbish** in the river and streams was identified. One comment referred to large amount of drug and alcohol related litter which is left in isolated places (particularly top of concrete road)
- The upkeep and cleanliness of structures ie bus stops, telephone box, display stands along the river.
- Clarification of right of way Langford Mill to Holme mill

Transport

Public transport

Reasons for never using public transport (T1) included:

1. Buses do not meet their needs.
 - Infrequent
 - Not at the times needed

"No useful times/frequency (ie no bus to train station at peak commuting times)"
 - Expensive
 - Not to the destinations required - Letchworth, Hitchin, Bedford, Biggleswade retail park – were cited as example.

"I work in Letchworth there is no bus from Langford. No evening buses to Hitchin or Henlow so can't use buses for eating out or leisure. Couldn't get to local services (e.g. Dr) on bus. I'm glad I've got a car!"
 - Unreliable

"Bus never arrived when I tried to take my children on one to Biggleswade"
 - Bus stop too far

"Too far to walk to bus stop"
2. The alternative to public transport was easier and more convenient – the majority of comments related to car use – having access to car and its convenience. Cycling and walking were options mentioned albeit very much less so than car use.

"Driving is more convenient, quicker and easier with children and belongings"
3. Whilst not knowing about the bus service was not commented on directly, a suggestion was made to improve visibility of the bus routes by having the timetables displayed on parish council website.

Specific reasons for rating of the overall bus service (T2)

There were a few positive comments relating to the bus service

"Reasonably reliable, clean and tidy buses"

"At least we get a regular service throughout the day"

However the majority were negative and referred to the issues raised in T1 above i.e.

- Not frequent enough,
- Lack of punctuality and reliability,
- Lack of suitable routes
- Timing to meet needs e.g. morning commute and lack of evening and Sunday service
-

Specific reasons for rating of bus timetable T3

Responses reflected the comments made in response to T1 and T2 with the majority concerning the lack of frequency and timing of the bus service to meet the needs for travel.

“No buses after 6.30pm. I'd use it to get to and from the station if there were”

However there was an additional issue identified relating to the ease of access to the current bus timetable and lack of confidence in it being up to date.

“Always struggle to find it on line, then worry that it is out of date”

“Who knows what is the bus timetable unless they have walked to the bus stop?”

With the suggestion that the timetable could be better displayed in the Langford diary and via better on-line or App availability.

Cycling

Reasons for not travelling to or from Langford by bicycle in the last year or never T4:

A common theme arising from the comments was that cycling is perceived to be unsafe or dangerous. The reasons given included:

1. Poor provision of cycling routes and surfaces

- Lack of cycle routes
- Roads poorly maintained
- Width of roads not suitable
 - “Roads are too narrow for cars to pass safely”*
- Parked cars not conducive to cycling
 - “lots of cars and HGVs going through the village and there seems to be lots more parked cars in the roads too”*
- Volume and speed of traffic
 - “I don't feel safe cycling with the volume and speed of traffic especially between the village and Biggleswade, the A1 or Henlow”*
- Paths poorly maintained
 - “the path to Biggleswade is often overgrown and not easy to cycle along.”*
- Width of path to Biggleswade not wide enough
 - “the path too narrow to use”*
- Inconsiderate driving behaviour
 - “Lack of safe cycle routes and inconsiderate motorists”*

The benefits and opportunities provided by safe cycling routes include access to employment, reduced car usage as described in this quote:

"Pavement routes near road and away from roads were overgrown so fell into brambles and the road. Road traffic often unsafe/not accommodating to cyclists. Would definitely cycle more if cycle lanes were available, plus my non driving young household could access increased employment options and/or have no need for further car trips to drop off/pick up around non standard working hours... they would cycle if it was safer"

And the potential for school students to cycle to Henlow is limited by lack of protected cycle route with adequate lighting.

"Too dangerous for kids to cycle to School; path on main road has areas of no hard kerbing to protect the path from road and is in poor condition & path to the back of the lakes is too risky with strangers and poorly maintained with over-grown bushes etc and no lighting."

2. No access to useable bikes

This mainly related to no ownership of a bike, although some were owned but had fallen into disrepair.

3. Physical limitations preclude cycling –

Mainly though age, disability, illness although there were a couple of comments admitting to being due to laziness.

4. Cycling not a realistic option

The need to carry heavy / awkward equipment and to manage young children made cycling not a practical option for some.

5. Availability of non-cycling options

This included car use for some as well as walking where the destination was close enough

Avoiding use of the car

If you currently use a car, what steps would need to be taken for you to use your car/s less?
(T5)

- **Not possible to avoid** using the car due to :
 - too inconvenient to do otherwise
 - Needed to travel the route and distance needed

- Needed to carry equipment
- Requirement of employment
- Disability
- **Better public transport**
 - Railway station in Langford
 - Better bus service to train stations – Biggleswade, Hitchin
 - Cheaper train fares
 - Regular reliable bus service covering the routes to other towns and villages
 - School bus to Henlow
 - Cheaper and more available taxis
 -
- **Improve cycling environment**
 - Traffic measures to slow cars
 - Dedicated cycle lanes and paths
 - Better cycle paths to Henlow, Clifton, Biggleswade, Stondon and Hitchin
- **More facilities in the village** within walking distance – more village shops and restaurants
- **Changes to employment**
 - Either more working from home or change of employer / retirement

Improvements in transport

Respondents were asked what do you believe needs to be done to improve transport to/from and around Langford? T6 and T7

Most of the comments reflect response to previous questions and included:

- Better public transport including shuttle bus to Biggleswade and Arlesey stations for commuters
- Car share scheme for workers
- Reduce the load on the roads by restricting heavy lorries, and housing developments.
- Better / designated cycle routes
- Improve road surfaces and potholes
- Provide free/ reasonable school buses
- Incentivise bus travel (e.g. voucher for coffee, prize draw)
- Increase number and frequency of community buses
- Stop people converting garages to rooms to avoid parking need
- Reduce using Langford as a thoroughfare for those without business in Langford
- New housing to have sufficient car parking to avoid on road parking

- Reduce and control parking (including near to junctions). Use of double yellow lines. However it was also noted that more roads and more parking means more cars
- Control speeding by use of speed camera (including average speed cameras) and other traffic calming
- Extend 20 mph throughout village
- Redesign of junction specifically Cambridge road junction
- Alternating traffic flows over the bridge on Edworth road
- Aim for ultra-low emissions within the village by? 2025/charge petrol and diesel vehicles after 2030
- Good safe pathway to Henlow by Baulk Woods

Infrastructure

School issues

Respondents were asked to list any additional school issues that you may have (I1). The main issue raised by the responses were:

Transport to school

Issues were identified in relation to the following:

- The impact of the withdrawal of the school bus to Henlow.
- The cost of transport to sixth form
- Access to college and training for non-drivers

Parking and Traffic

Increases in traffic and parking at school run time were identified with a wider impact beyond the immediate school users.

Poor parking by parents, lack of parking spaces and increased congestion were issues, with these being perceived as a safety issue as well as being inconvenient for parents and local residents.

"Parking outside the school is a major traffic problem and probably a hazard to health, life and limb."

"Anything that reduces traffic congestion around the School at opening and closing would benefit everyone!"

The following comment identified the promotion of active travel and infrastructure development as being a way of helping to address this issue:

"Bad traffic outside the school at school times: unpleasant, unsafe, air polluting. Should promote active travel to school by protected bike & walk ways, 20mph throughout, perhaps "bike trains" and or "walking trains".

Access to School places

Concern about access to school places was raised in relation to the increased housing in the village causing pressure on places and also the plans being developed by the village academy to reduce the intake level.

“With all of the new housing developments I worry that there will be limited places for the lower school and pre school when my daughter is of the right age to attend them. I want her to be part of the school community”

However it was also noted that there is sufficient places at present and that the situation compared favourable to a neighbouring county.

Quality and scope of provision

A few comments were received expressing a poor view of the quality of secondary schools. Specific mention was made in relation to providing challenge for all including high attainers.

“Higher attainers are not sufficiently challenged.”]

One comment described Langford Village Academy as a *“brilliant school”*

Technology issues

Respondents were asked to list any additional technology issues (I2). Responses included the following:

- **Lack of mobile coverage** in certain parts of the village
- **Lack of broadband service**
- **Speed of broadband service**
- **Intermittency of broadband service**
- **Frequent/ regular power cuts**
“Too many outages of electricity supply”
- **Limitations on choice of providers**
“We find we are tied to BT which does not give us the best value for money”
- **Cost of available option** due to lack of competition
- These issues did have an impact for some on their **ability to work from home**
“It is a major problem due to me and my husband working from home and some days have no access to the internet.”
- **Impact of additional housing development.** More housing has impacted on the service and concern expressed that future developments will impact further.
“Internet speed and contention ratio also much poorer since new houses built”

Leisure issues

Respondents were asked to list any additional leisure issues (I3). The comments fell into the following areas:

- **Meeting and balancing needs across the age groups.**

Both facilities for the older, teenage and older age groups were mentioned

"More evening facilities for over 65s"

"More facilities for kids"

"Need more youth clubs/ activities for teenagers?"

But also the need to balance facilities across the age groups was inferred in this comment.

"More indoor facility's for ADULTS plus 14+ year olds . Everything is aimed at young children then we complain when teenagers/young adults are getting bored and causing trouble."

- **Transport to activities** was identified as an issue, with lack of safe cycling routes and lack of access via taxis even being unavailable on Sundays.
- **Maintenance of open spaces**
"Better maintenance of walk ways. And litter floating in the streams onto the common. More frequent collection of dog excrement"
- **Knowing about what is available**
"I am concerned about availability and familiarity of current and future villagers with exactly what is available and where."
- Provision of **allotments**
- Provision of a **bandstand**
- **Improving access to current facilities across the age groups**
"Access needed to tennis and bowls club for younger residents, great facilities but only available to members"

"Better access to water (Canoeing) and better relationships with stakeholders around access would be good."

"access to river from new burial ground on Church Street"
- **Sports and exercise facilities** - netball court, badminton club, squash courts, skate park and cricket nets were mentioned as well as the timing of the opportunities
"More daytime exercise facilities/classes eg Pilates, yoga"

"squash courts & skate park would be nice"
- **Development and improvement of facilities**
"Also the SCALING of facilities to meet government (and socially desirable) targets for health, exercise and social interaction"
- **Opportunities for socialising** – pubs and restaurants.

Health care issues

Respondents were asked to list additional health care issues (14)

- **Access to appointments**

The main issue identified related to the difficulty in obtaining appointments and in particular obtaining appointments locally in Langford.

It was perceived that the increase in the population was exacerbating this problem.

Attending appointments in Biggleswade was compounded by the limitations of public transport

- **Dental care** was not available in the village
- **Access to mental health service** was also limited
"Mental health services hard to access especially for young people"
- **The local pharmacy** was seen positively
"the Langford Pharmacy is a huge godsend to the village"

Retail issues

Respondents were asked to list any additional retail issues (I5).

Comments related to the following issues:

- **Access to pub, restaurant and café** received most comments with the current provision seen as being inadequate in both number and style.
"Needs decent food pub in Langford suitable for families"

Would be nice to have a local Cafe / Bistro that also sold local produce (ideally plastic free).

The village needs a good pub as a central point for the community. If does not have one
- **Transport.** The need for transport to do shopping other than online or within the perceived limited range of shops within the village.
"Again all stems back to transport, you can not do a weekly shop in the village, so you need to leave, which means you will spend less in the shops that are here."
- **Limited range of shops.** The post office received some positive comments being reported as helpful and well run. However comments did relate to the limited range of shopping and that those that were in Langford was seen as expensive by some respondents.
"Shops providing basic everyday necessary items are important."

"The village lacks the retail facilities to support the community and especially elderly."

The suggestions for shopping included sports shop, the ability to purchase fresh locally produced produce in one store, a mini Tesco, local butcher, bakery , a chip shop, 24 hr access to cash machine and major electrical appliances shopping. The following comment suggests a venue for retail development.

"The new cafe in the High St is welcome. We would like at least one more pub - a pity that the Wrestlers re-opening has proved abortive. I don't see many opportunities for new retail facilities, but the Wrestlers site would be a good place to have a shop

"Would like to see an eco shop or pop up shop run in the village to reduce plastic and clothing waste"

Other issues

Respondents were asked in terms of the local infrastructure, what else is important to you and should be considered? (I6)

Comments included a number of the areas identified above i.e.

- Pubs , restaurants and entertainment facilities
- Health care access
- Parking and traffic congestion
- Public transport
- Development and maintenance of foot paths
- Infrastructure to manage the increase in housing – transport, sewage, storm run off, schools, health care
- Limitations on building development
- More communal spaces for social interaction

But also relating to the **nature of the village life**:

“How do we keep the village being a village -which is why people live here and love being here...

How do we progress but in a positive progression and not a negative one? How do we promote community and responsibility - helping, caring, enjoying and taking a pride in our village?”

With one suggestion for an overall approach:

“Just need a village Centre”

Planning

Locations suitable for new housing

Respondents were asked when viewing the map to identify locations that they thought suitable for new housing P1 and not suitable (P2)

A number of responses indicated no or none i.e. no more new housing.

Others referred to general characteristics rather than specific locations:

Thought suitable for new housing (P1)	Locations where you think houses shouldn't be built? (P2)
Only at bottom (Henlow end) or top (Broom end) of village	
Various small infill sites appropriate	Not within existing village
Most seem OK if there is proper access and sufficient off road parking	
Somewhere that could provide affordable, efficient homes	Unaffordable large houses
Land that is already held in Central Bedfordshire or Social housing "Aragon" Land Banks.	
	Not near river or on flood plains.
	Not near railway line
	Not on or adjacent to green spaces or wildlife habitats
	Not on agricultural land
	It's not so much where, but the volume of houses being built
	Not behind existing homes

Clearly there are mixed views on the locations of any new housing developments. Specific locations mentioned included the following:

Thought suitable for new housing (P1)	Locations where you think houses shouldn't be built? (P2)
The triangle was mentioned a few times as it is infill and has limited access / amenity for much of the village.	The triangle
Land should be used between railway or river before land around the outside of village	Between High Street and river
East of the railway line.	No building between A1 and Railway line
Land between the village and the railway should be considered for extensions for education and leisure uses along with new homes.	

fields to the north of the village, south of Running water farm	North of Tithe Farm Close,
Biggleswade side of Langford	
Poppy hill farm south of the village	
South of Cambridge road	South of Cambridge Road
Bridge field	Bridge Field
Thistle field	Thistle field
The Wrestler's pub	
infill all the field between the envelope and the railway line rather than develop to the south and north of the village	
Land east of Station Road/ Land off St Andrews Way	St Andrews Way
Balls Farm towards the Wind Farm	
Langford road side near garden centre	
Flexmore Avenue	Flexmore Ave.
	Jubilee Lane/Manor Close
	Station Road
	Tithe Farm close

Concerns relating to housing development

Respondents were asked what would be your main concern/s if housing development takes place? (P3). The comments reflected the following areas of concern:

- Loss of identify as a village
"No longer a village, small town without facilities"
- Lack of infrastructure – sewage, water, access to health care, schools, roads, parking, transport
- Congestion, traffic, pollution, noise
- Loss of green and open spaces and impact on wildlife

Additional comments regarding housing was sought (P4) and those comments reflected concerns already mentioned about too much development, the speed of development and its impact and loss of village identity.

However there were additional suggestions relating to the following:

- Need for off road parking; permit parking; parking bays for visitors
- Need for affordable housing – smaller units – to allow for local families to live within the village

And a call for proper planning to protect the good aspects:

"It's a nice place to live, but it's no good pretending it's a small rural village any more. It's too close to London for that now. We have to ensure we don't spoil the good aspects of it, both for existing and new residents. We can't trust that simply to

building developers that need to achieve maximum profitability. We need some proper planning vision”

LNP Education, Groups, Societies, Services Consultation Summary

Environment

- Access to green spaces was valued – and important to be kept that way.
“ we need to keep our lovely green spaces for the next generation.....”
- Opening up of more public footpaths and cycle paths and a call for some of them to be accessible for wheeled push chairs. Better maintenance of pavements and paths to improve opportunities for those with disabilities or the elderly.
- Value the churches as a focal point for their history and contribution to the community

Transport

- Lack of parking was identified as an issue e.g. for transporting elderly residents to doctors, shops etc. and a barrier to accessing community facilities such as the chapel.
- Parking around the school at key times limited access for others to use the parking for church and doctors, but also impeded access for other using the village hall at this time. Inconsiderate parking can obstruct the passage of mobility scooters and pedestrians.
- Potholes in the road was an issue for cyclists and car drivers.
- Lack of public transport – improvements would bring opportunities. The Ivel sprinter service could be expanded with demand and funding.

Planning and development

- Potential for develop existing space and infrastructure to increase community/social interactions *for example* use of church land for living churchyard, larger hall for physical activity classes, carpet bowls
- Installation of bike racks in key areas
- Developments should increase options for walking
- Developments should be small; and improve housing provision for local families, the elderly

Infrastructure

- Better access for medical appointments
- Infrastructure in place before the development and influx of people

Appendix 6.4.5 LNP Business Questionnaire Summary

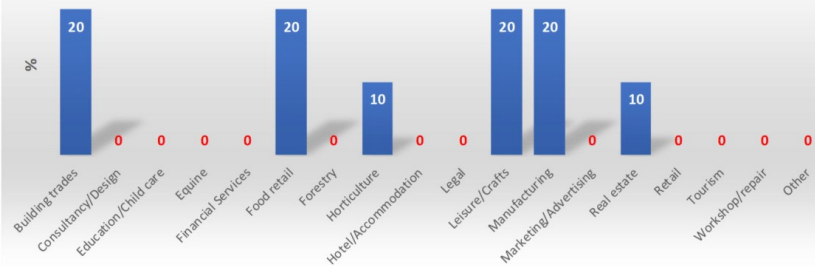
All known businesses within Langford were approached between January and July 2019 (please see Section 2.7) via e-mail, mail, Facebook or face-to-face meetings. There were only ten responses to the business questionnaire, with many potential respondents explaining that they had already had an opportunity to comment through the previous LNP Questionnaire. The following is a summary of the small number of responses:

Business questionnaire analysis 2019: Langford Neighbourhood Plan

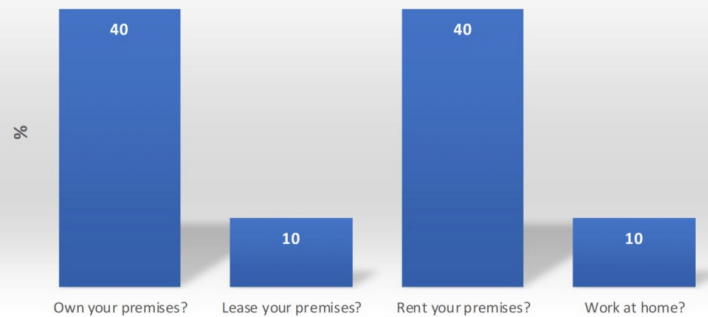
Select the area in Langford in which your business is based



What type of business are you in?

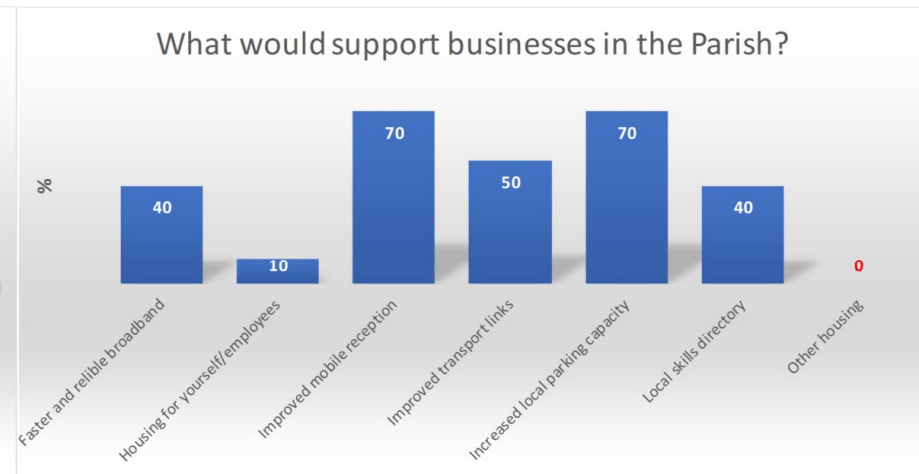
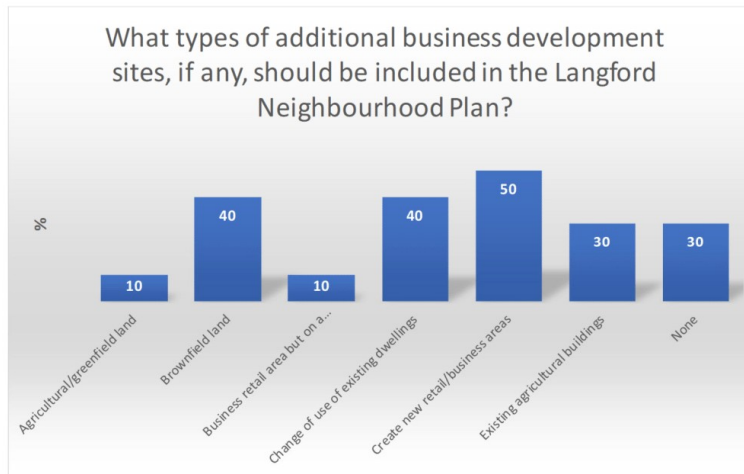


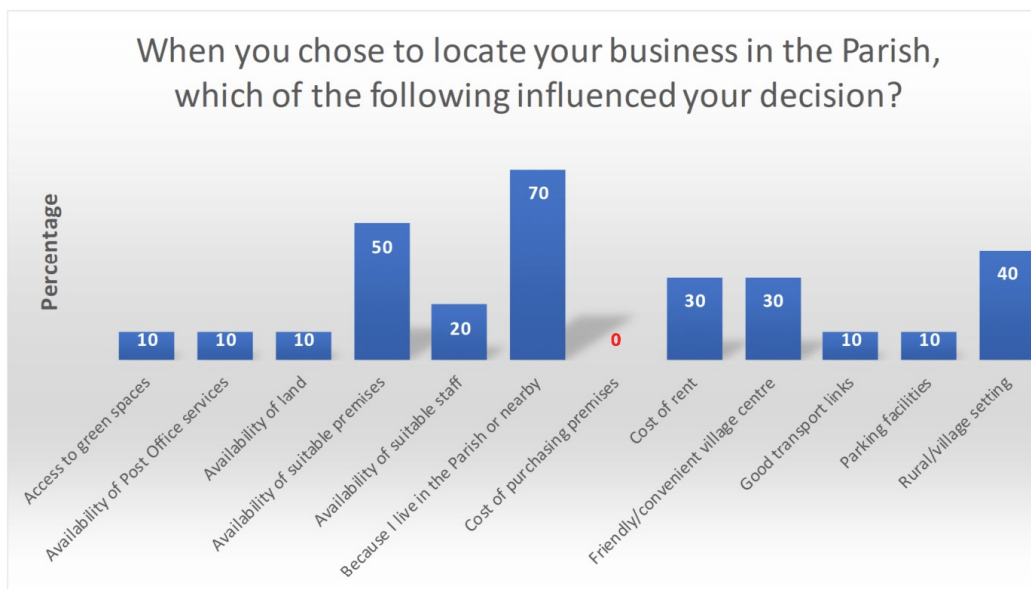
For your business premises do you:



What type of additional workspace will you require in the Parish in the next five years?







What factors, if any, will influence whether your business will remain in the Parish?

If the rate of village growth continues, the business will relocate.

Parish remains rural

An active village where people want to live and work with good transport links

Village support

It will, with all will and intention, stay in the Parish as we're named after the village and as such well supported the Parish

Space

Rent on premises

If I continue to live here

Appendix 6.4.6 Langford Village Academy

Summary of consultation with children at Langford Academy

The staff of Langford Academy were asked to consult with the children and to seek their views on Langford now and in the future.

The staff asked the children to discuss and write down their thoughts following the presentation of the following questions. They were invited to illustrate their answers with pictures if they wanted to.

Q1. What 2 things would you like to have in our (Langford) village in the future?

Q2. What do you like and dislike about our (Langford) village?

137 children, all residents, of Langford responded with a variety of answers. The following classes took part: Year 3-4 Orca; Year 3-4 Otter; Year 2 Turtle; Year 3 Dolphin; Year 1-2 Seahorse and Penguin; Foundation

The responses have been considered and grouped under the four main headings we are using in the Neighbourhood Plan

Transport – In this topic the children disliked the volume and the speed of the traffic which causes pollution and noise. In addition, they were critical of the disorganised parking outside their school. They suggested better parking could be organised.

Planning and Development - Here the children showed a preference for well-designed and aesthetically pleasing houses together with their school. They were critical of too many houses consuming their countryside. Some mentioned homes close to noisy trains. Many said they were happy with size of Langford and did not want it to become bigger.

Environment - This is an important topic for the children and they are very concerned about the volumes of litter and dog poo in the village and in particular on pavements. The quality and number of trees and flowers was mentioned many times and the children clearly wish for better protection or improvements in this area.

Infrastructure – The children like the park amenities, the friendly people and the scenery. They also expressed a desire for more active play equipment in the village including a zip wire and a swimming pool or a water splash park. Some asked for a bigger school with more space. They like the church and its historical significance. To satisfy their priorities more ice cream/sweet shops, an arcade, cinema, and fast food outlets for them and their parents were also mentioned.

Some pictures expressing their views follow.



Views from Langford pupils who attend Henlow Church of England Academy

82 pupils took part in the above consultation for Langford Parish Council Neighbourhood Plan. The pupils ages ranged from 9 to 13. They were asked a number of questions and worked on them together in a mixed age range grouping.

The questions they were asked were:

[What do you like/dislike about Langford?](#)

[Which two things would you like to have in Langford in the future?](#)

The responses returned brought out some common themes.

Likes

- Friendly people
- Post Office
- Park
- Skate park
- River

Dislikes

- Drug users
- Litter
- Continual building

What pupils would like to see

- Recycling bins
- Bottle exchange
- A larger skate park
- Outdoor gym equipment
- Gym
- Youth Club
- Swimming Pool
- Countryside conservation area

Appendix 6.4.8 Langford Village Academy

Neighbourhood plan – Evidence from clubs and organisations

During April and May 2019, a number of clubs and organisations that operate within Langford were contacted by members of the NP steering group and asked to contribute any additional comments in respect of the four focus areas for the neighbourhood plan i.e. Environment, Transport, Planning and Development and Infrastructure. It was emphasised that the comments were from the club/ organisation perspective – what aspects would help the organisation thrive for the benefit of Langford and its residents in the future?

Respondents are listed below - eighteen in total with an estimated attendance in the order of 500 with about 60% being in the older retired age groups but with significant numbers of younger people involved in cubs/ beavers/ scouts and the sports clubs.

The responses were analysed to identify key themes and a summary of the findings are as follows:

Environment

- Access to green spaces was valued – and important to be kept that way.
“we need to keep our lovely green spaces for the next generation.....”
- Opening up of more public footpaths and cycle paths and a call for some of them to be accessible for wheeled push chairs. Better maintenance of pavements and paths to improve opportunities for those with disabilities or the elderly.
- Value the churches as a focal point for their history and contribution to the community

Transport

- Lack of parking was identified as an issue e.g. for transporting elderly residents to doctors, shops etc. and a barrier to accessing community facilities such as the chapel.
- Parking around the school at key times limited access for others to use the parking for church and doctors, but also impeded access for other using the village hall at this time. Inconsiderate parking can obstruct the passage of mobility scooters and pedestrians.
- Potholes in the road was an issue for cyclists and car drivers.
- Lack of public transport – improvements would bring opportunities. The local community bus services could be expanded with demand and funding.

Planning and development

- Potential for develop existing space and infrastructure to increase community / social interactions *for example* use of church land for living churchyard, larger hall for physical activity classes, carpet bowls
- Installation of bike racks in key areas
- Developments should increase options for walking
- Developments should be small; and improve housing provision for local families, the elderly

Infrastructure

- Better access for medical appointments
- Infrastructure in place before the development and influx of people

Appendix – contribution from the following groups/ organisations

Beavers	Scouts	Cubs	Cricket
Bowls	Walking Group	Cycling Group	Langford Friends
History Society	Welcome Club	Women's Institute	Ivel Sprinter
Methodist Chapel	St Andrews Church	Yoga	Oasis Coffee Shop
Morning Coffee Shop	Ballroom Dancing		

Report prepared by Helen Knowles and Lesley Jordan-Devenish, NP steering group members

June 2019

Appendix 6.4.9 St Andrew's Church

From: **Shaun Speller** <rev.shaun.speller@gmail.com>
Date: Tue, 3 Nov 2020 at 11:04
Subject: Re: Langford Neighbourhood Plan
To: Michelle Albone <michellealbone.langfordpc@gmail.com>

Hi Michelle,

Difficult to unpick this one! If we are looking inwardly at safeguarding St Andrews as a community asset then contributory factors are: Plans in place to maintain the churchyard; ongoing maintenance plan for building in line with statutory 5 year survey; current project to install toilets/kitchen. Looking outwardly I guess the issues are greater volume of traffic due to extra residential development and inadequate parking facilities for school opposite. I am not sure if that is of any help!

Regards

Shaun

On Mon, Nov 2, 2020 at 12:54 PM Michelle Albone <michellealbone.langfordpc@gmail.com> wrote:

Hi Shaun

We are looking to submit the final Neighbourhood Plan in the next couple of weeks.

I wonder if you might assist on some information from the Church as Historic England were consulted on the plan and made the comments below regarding safeguarding Historic Assets.

Do you have any comments we could include on Safeguarding the Church we could include in response to their comments please? If you don't have any comments that's fine we just need to show our acknowledgement of their comments and our response to them.

Many thanks for any help you can provide!

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.

Kind regards

Michelle Albone

Langford Parish Council Clerk and RFO

Appendix 6.4.10 Biggleswade Town Council



Michelle Albane <michellealbone.langfordpc@gmail.com>

Notes following meeting with Biggleswade Town Council re Neighbourhood Plan

SHIPMAN JOHN <j.m.shipman@ntlworld.com> 21 September 2019 at 09:17
 To: tania.barr7@ntlworld.com, Michelle Albane <michellealbone.langfordpc@gmail.com>, Alycia Hatt <hattrobins@gmail.com>, Anna Livings <aelivings@uwclub.net>, Arvind Aniyer <arvind@aravindaniyer.co.uk>, Becky Roe-Smith <bex_12@btinternet.com>, Bill Wilson <wgb.wilson@icloud.com>, David & Caroline Hawkes <riverhouse5656@gmail.com>, David Bellwood <davidbellwood@ntlworld.com>, Helen Knowles <millhelen@btinternet.com>, Ian Sommerschild <sommerschild@btinternet.com>, Julian Vaughan <juliman66@gmail.com>, Julie Springett <juliespringett@btinternet.com>, Keith Hichisson <k.hichisson@ntlworld.com>, Lesley & John Devenish <together-we-can@hotmail.co.uk>, Malcolm Wray <mal.wray62@gmail.com>, Mark Robins <markrobins196@gmail.com>, Perry Huntley <perry.huntley@ntlworld.com>, Sarah Pender <sarah.pender@icloud.com>, peter_b_f_richards@yahoo.com, ANTHONY LEWIS <hemal@ntlworld.com>
 Cc: Binanti Cuzner <binantis@hotmail.com>, Dave Williams <will_de@hotmail.com>, Debbie Wilson <wilsondebbie4789@gmail.com>, Gill Clarke <gillyannclarke@gmail.com>, Jane Wright <jnwri@aol.com>, Joan Rutt <joan.rutt@ntlworld.com>, Mick Beazley <mj.beazley@ntlworld.com>, Mike Kalaher <mike.kalaher@ntlworld.com>, Richard Arnott <richard_arnott@yahoo.com>

Hello

Mick Beazley and self attended a Town Council meeting when the Biggleswade Neighbourhood Plan was discussed. Their presentation is attached.

The main points of interest and concern which could have an impact on Langford were:

1. Rail Commuter parking needs expanding
2. Bus waiting area to be moved from Market Square to Rail Station.
3. Disabled access to rail platforms
4. Rejection of planning application for flats without adequate parking
5. Redevelopment of Market Square, possible demolition of Century House and de-cluttering the square.
6. Their first survey of the population generated 331 responses
7. Lack of residents parking and narrow, unadopted, roads at Kings Reach
8. Future health care provision with the proposed new Hub on the hospital site serving "East Bedfordshire". Considered too far from the town centre and villages such as Langford.. Would prefer drop in centres in the High Street. Saffron Road surgery might be redeveloped into houses.
9. Revitalisation of the Shopping landscape. Improve architectural appearance of shop fronts.
10. Shortage of green space
11. They will employ a consultant to write their policies.
12. Impact of large scale housing development to the east.
13. Reduction of bus services

Regards

john

NP Workshop Presentation Sept 19.pdf
897K

Langford Neighbourhood Plan

Regulation 14 Consultation



December 2019

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1 INTRODUCTION

1.1 Context

- 1.1.1 Gladman Developments Ltd (hereafter referred to as “Gladman”) specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs.
- 1.1.2 These representations provide Gladman’s response to the current consultation on the Langford Neighbourhood Plan (LNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.
- 1.1.3 Through these representations, Gladman provides an analysis of the LNP and the policy decisions promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the LNP’s suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG¹.
- 1.1.4 In accordance with the Neighbourhood Plan Basic Conditions, Neighbourhood Plan policies should align with the requirements of the National Planning Policy Framework (the Framework) and the wider strategic policies for the area set out in the Council’s adopted Development Plan. Neighbourhood Plans should provide a policy framework that complements and supports the requirements set out in these higher-order documents, setting out further, locally specific requirements that will be applied to development proposals coming forward.
- 1.1.5 The LNP should only be progressed if it meets the Neighbourhood Plan Basic Conditions, supported by a robust and proportionate evidence base.
- 1.1.6 The Framework is clear that Neighbourhood Plans cannot introduce policies and proposals that would prevent sustainable development opportunities from going ahead. They are required to plan positively for new development, enabling sufficient growth to take place to meet the development needs for the area and assist local authorities in delivering housing need. Policies that are not clearly worded or intended to place an unjustified constraint on further sustainable development from taking place are not consistent with the requirements of the Framework or the Neighbourhood Plan Basic Conditions.
- 1.1.7 The LNP should not seek to include policies that have no planning basis or are inconsistent with national and local policy obligations. Proposals should be appropriately justified by the findings of a supporting evidence base and must be sufficiently clear to be capable of being interpreted by

¹ Section ID: 41

applicants and decision makers. Policies and proposals contained in the LNP should be designed to add value to existing policies and national guidance, as opposed to replicating their requirements.

- 1.1.8 As the Parish Council is aware, Gladman are promoting land in the neighbourhood area for residential development at land off Cambridge Close. The site is currently proposed as an allocation in the emerging Central Bedfordshire Local Plan (HAS30 and HAS31) and an application was submitted on this site in February 2019. It was resolved to approve this application, subject to the completion of a Section 106 agreement at Committee in September 2019.

2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the LNP must meet are as follows:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
- c) Having regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
- d) The making of the neighbourhood plan contributes to the achievement of sustainable development;
- e) The making of the neighbourhood plan is in general conformity with the strategic policies contained within the development plan for the area of the authority; and
- f) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
- g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

2.2 National Planning Policy Framework, & Planning Practice Guidance

National Planning Policy Framework

2.2.1 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements of the preparation of Neighbourhood Plans within which locally prepared plans for housing and other development can be produced.

2.2.2 In July 2018, the Minister of Housing, Communities & Local Government (MHCLG) introduced the first changes to the Framework (the Revised Framework) which has since brought about fundamental changes to the planning system. The Revised Framework was then updated in February 2019 to include some minor clarifications.

2.2.3 In relation to the preparation of Neighbourhood Plans, paragraph 13 of the Revised Framework states:

“The application of the presumption [in favour of sustainable development] has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”

- 2.2.4 Further guidance on how the Presumption interacts with Neighbourhood Plans is provided in paragraph 14 of the Revised Framework.
- 2.2.5 The Revised Framework sets out how neighbourhood planning gives communities the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development. However, neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies contained in higher order documents.

Planning Practice Guidance

- 2.2.1 It is clear from the requirements in the Framework that neighbourhood plan policies should be prepared in general conformity with the strategic requirements for the wider area, as confirmed in an adopted Development Plan. The requirements set out in the Framework are also supplemented by the Government’s suite of Planning Practice Guidance (PPG). In relation to the preparation of the LNP, the PPG on Neighbourhood Planning is of particular relevance.
- 2.2.2 Paragraph 009 of the PPG states:

“A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the [basic condition](#). Although a draft neighbourhood plan or Order is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, [up-to-date housing needs evidence](#) is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.

Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- the emerging neighbourhood plan
- the emerging Local Plan
- the adopted development plan

with appropriate regard to national policy and guidance.

The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.

The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan, including housing supply policies. This is because [section 38\(5\) of the Planning and Compulsory Purchase Act 2004](#) requires that the conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan.”²

2.2.3 This guidance is intended to ensure that emerging evidence of housing need is addressed, to in turn help minimise any potential conflicts which can arise and ensure that policies are not overridden by a new Local Plan.

2.2.4 The PPG also emphasises that;

“...blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence”

2.2.5 With further emphasis that;

“.... All settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”³

2.2.6 Accordingly, the LNP will need to ensure that it takes into account the latest guidance issued by the SoS so that it can be found to meet basic conditions (a) and (d).

2.3 Strategic Environmental Assessment

2.3.1 In accordance with PPG ID: 11-027, the preparation of Neighbourhood Plans may fall under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan’s proposals would be likely to have significant environmental effects.

2.3.2 The SEA is a systematic process that should be undertaken at each stage of a Plan’s preparation. It should assess the effects of a Neighbourhood Plan’s proposals and whether they would be likely to have significant environmental effects and whether the Plan is capable of achieving the delivery of sustainable development when judged against all reasonable alternatives.

² PPG Reference ID: 41-009-20160211

³ Paragraph: 044 Reference ID: 41-044-20160519 (Revised 19/05/2016).

- 2.3.3 The decision making and scoring of the SEA should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often SEA flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.
- 2.3.4 It is currently unclear whether the LNP has been subject to SEA Screening, or whether a SEA is required in this instance. Given the nature of the LNP's proposals, Gladman suggest that there may be a requirement to undertake a full SEA to support the LNP's preparation. A failure to do so could mean that the LNP is not legally compliant and risk the neighbourhood plan failing to meet basic condition (f) when examined.

3 DEVELOPMENT PLAN

3.1 Adopted Development Plan

- 3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.
- 3.1.2 The adopted Development Plan relevant to the preparation of the LNP is the Central Bedfordshire (North) Core Strategy and Development Management Policies Development Plan Document (November 2009) and the Site Allocations DPD (April 2011). These documents provide the vision, objectives, spatial strategy and overarching policies to guide development in the north area of Central Bedfordshire for the period 2001 to 2026. In addition, certain policies of the Mid Bedfordshire Local Plan (December 2005) were saved by the Secretary of State on 23 September 2008 and continue to be part of the Development Plan until Central Bedfordshire Council indicates that they have been superseded through the adoption of new policies in the emerging new Local Plan.
- 3.1.3 It must however be noted that elements of the adopted Development Plan, in particular its policies relating to housing needs and the supply of housing, are inconsistent with the Framework's requirements and the Government's objective of significantly boosting the supply of homes.

3.2 Emerging Development Plan

- 3.2.1 Central Bedfordshire Council (CBC) is in the process of preparing a new Local Plan for the district. The Plan was submitted to the Secretary of State on the 30th April 2018 and is currently subject to an independent examination by the Planning Inspectorate.
- 3.2.2 Gladman have been involved in each stage during the preparation of the new Local Plan and have appeared at many of the hearing sessions that have been held to date. At this time there remain a number of significant objections relating to the soundness of the strategic policies contained within the emerging Local Plan.
- 3.2.3 Representations to the submission Local Plan have set out that the housing requirement in Central Bedfordshire should be significantly higher for a variety of reasons. If the Inspectors of the Local Plan Examination find that Central Bedfordshire should be planning to account for additional needs, Central Bedfordshire Council would need to increase development in the more sustainable settlements across the district. It is important to note that the Council considers Langford as a sustainable settlement and is designated as a 'Large Village' within the emerging Local Plan.
- 3.2.4 As noted on page 10 of the LNP, the outcomes of the Local Plan Examination were not known at the time of the LNP's preparation. Indeed, this remains the case at the time of writing these representations. It has however been made clear through post-hearing correspondence between

CBC and the examining Inspectors that significant additional work is required if the plan is to be found sound. At this point in time, we are awaiting the publication by CBC of a schedule of actions and an associated timetable for the preparation of this additional work, which will follow on from a number of requests made by the Inspectors during the hearings and in their post-hearing correspondence.

- 3.2.5 The new Local Plan was submitted for examination under the transitional arrangements that are set out in the Framework within Annex 1: Implementation. As a result, CBC has given recognition to the urgent need to review and update the emerging Plan and has committed to an early Partial Plan Review to take into account the significant changes associated with the Oxford- Milton Keynes - Cambridge Arc and the calculation of Local Housing Needs using the standard method (LHN) that is contained in the Framework and PPG. As acknowledged in the Submission Version of the CBC Local Plan⁴, LHN has led to a significant increase in the number of homes that will be required in Central Bedfordshire over the plan period 2015 to 2035. Any emerging neighbourhood plans in the CBC area will therefore need to be mindful of this changing position and ensure that their objectives, strategies and policies are suitably flexible and responsive to the increasing level of housing that will be required to address needs.

⁴ Section 1.4 and 1.5, Central Bedfordshire Pre-Submission Local Plan 2015-2035

4 LANGFORD NEIGHBOURHOOD PLAN POLICIES

4.1 Context

4.1.1 These representations are made in response to the current consultation on the Regulation 14 Version of the Neighbourhood Planning (General) Regulations 2012. This chapter of our representations highlights the key points that Gladman raise regarding the content of the LNP as currently proposed.

4.1.2 As currently proposed, Gladman believe that a number of the LNP's policies require modification/amendment, before they can be considered consistent with the Neighbourhood Plan Basic Conditions.

4.2 General comments

4.2.1 It is noted that page 6 of the Neighbourhood Plan includes text that sets out that it is an intention of the Neighbourhood Plan to make it clear that further large-scale housing developments are not supported. However, given the wider context of growing housing needs across Central Bedfordshire, it is important that all sustainable settlements such as Langford continue to make a positive contribution towards meeting development needs over time. Indeed, page 6 of the LNP goes on to explain that the LNP will require flexibility as new challenges and opportunities arise over the plan period. It is therefore vital that such flexibility is built into the LNP to ensure that sustainable forms of development can come forward without delay.

4.2.2 A further general point is the lack of consistency between the proposed plan period of the Neighbourhood Plan (2019 to 2039) and the Plan Period for the emerging CBC Local Plan (2015 to 2035). This is despite section 1.9 of the LNP stating that the Langford Neighbourhood Plan will run concurrently with the emerging Central Bedfordshire Local Plan. It is our view that the plan period of the emerging Local Plan and the Neighbourhood Plan should be aligned.

4.2.3 Section 2.4 of the LNP includes a plan entitled: "*Physical boundary constraints*". However, the associated OS Map shows the proposed settlement envelope for Langford. It is essential that settlement boundaries are treated in a manner that allows sustainable sites to come forward beyond the limits of the existing built form to accommodate development needs and ensure that communities can grow and thrive.

4.3 Policy EN4: Identify, monitor and control protected areas

4.3.1 The emerging Local Plan allocates sites HAS30 and HAS31 (Land off Cambridge Road) and an outline planning application for residential development benefits from a resolution to grant (subject to S.106) (application reference: CB/19/00336/OUT). It is important that the LNP recognises that reserved matters applications should be supported where they are in line with an outline approval.

- 4.3.2 The proposed policy also indicates that future development should not impact on 'current and future protected areas'. Two such areas are described as the 'Inner Triangle' and areas to the north of the village (i.e. Langford Road). There is no basis for the blanket protection of these areas through this policy and is therefore not considered to have had sufficient regard to national policy.

4.4 Policy PD1: Housing Allocations

- 4.4.1 Whilst it is recognised that there have been a number of new housing developments in Langford over recent years, this has been as a result of the need for a positive response to housing needs in Central Bedfordshire and the sustainable nature of Langford. Despite what is stated in Paragraph 3 of this policy, the LNP is progressing at time when the full housing needs in the Local Plan have not yet been determined and there remain significant objections to the proposed housing requirement in the emerging Local Plan as explained in Section 3 above. Furthermore, the emerging Local Plan recognises that housing needs have increased and that a review of the Plan is needed in the short term to address this issue. As such, we suggest much greater flexibility will need to be drafted into this policy (and other policies within the LNP) to recognise that further development proposals will need to be positively considered during the plan period. Gladman have suggested how such flexibility could be incorporated in to the LNP through policy PD5 below.

4.5 Policy PD5: Development Scope and Housing Density

- 4.5.1 It is noted that 'Criterion 1' indicates that development should normally take place within the settlement envelope. As discussed in Section 3, additional flexibility will be required over the plan period to ensure that the growing housing needs of Central Bedfordshire can be accommodated in sustainable locations. This should therefore be acknowledged and reflected within the LNP. Seeking to limit development in such a way does not accord with the positive approach to growth required by the Framework. Gladman suggest that this policy should therefore be worded more flexibly in accordance with Paragraphs 11 and 16(b) of the NPPF (2019) and the requirement for policies to be sufficiently flexible to adapt to rapid change and prepared positively.
- 4.5.2 Accordingly, Gladman consider that the above policy should be modified to allow for this flexibility and it is considered that the LNP would be better served by a criteria-based approach consistent with the requirements of national policy and the following wording is put forward for consideration:

"The neighbourhood plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Development proposals that accord with the policies of the Development Plan and the Neighbourhood Plan will be supported particularly where they provide:

- *New homes including market and affordable housing; or*
- *Opportunities for new business facilities through new or expanded premises; or*

- *Infrastructure to ensure the continued vitality and viability of the neighbourhood area.*

Development proposals that are considered sustainable and well related to the existing settlement will be supported provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development."

4.5.3 'Criterion 5' should be redrafted to have regard to paragraph 108(c) of the Framework, which indicates that it should be ensured that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

4.5.4 It is noted that 'Criterion 6' seeks to introduce a maximum density standard of 30 dwellings per hectare. Density standards of this nature should be robustly evidenced. Furthermore, flexibility should be provided within criterion 6 to allow for higher densities to be justified in locations where this would represent a positive response to the specific characteristics of a site.

5 CONCLUSIONS

- 5.1.1 Gladman recognises the Government's ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the LNP must be consistent with national planning policy and the need to take account of up-to-date housing needs evidence and the direction of growth outlined in the emerging Local Plan. If the plan is found not to meet the Basic Conditions at Examination, then the plan will be unable to progress to referendum.
- 5.1.2 The Parish Council must ensure that the policies within the LNP allow for sufficient flexibility and are based on robust and justified evidence. Gladman would be happy to discuss the contents of these representations with members of the Parish Council in more detail. Should this be of interest, please do not hesitate to contact us.

Langford
Neighbourhood Development Plan
DRAFT V17 NOVEMBER 2019

January 2020

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APPENDIX 1 SITE LOCATION PLAN

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1 INTRODUCTION

1.1 Context

- 1.1.1 Planning Prospects are a planning, development and regeneration consultancy who are actively involved in a range of projects throughout the country, promoting development across a wide variety of sectors. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs.
- 1.1.2 These representations provide Planning Prospects' response to the current consultation held by Langford Neighbourhood Plan Parish Council before it submits the draft Plan to Central Bedfordshire Council for formal consultation.
- 1.1.3 The Council and Parish Council are aware of Planning Prospects' land interests to the west of Langford Road, Langford and we are promoting this site through these representations for an allocation for residential development. The 3.11 hectare site presents an opportunity to create a sustainable, high quality residential development in a suitable location. The site is currently subject of an appeal (APP/P0240/W/19/3236423) following submission, and refusal, of a planning application through Central Bedfordshire Council (CB/18/04783/OUT).
- 1.1.4 Through these representations, Planning Prospects provides an analysis of the Langford Neighbourhood Plan (LNP) and the policy decisions promoted within the draft Plan. Comments made by Planning Prospects through these representations are provided in consideration of the LNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG¹.
- 1.1.5 The revised National Planning Policy Framework was first published by the Ministry of Housing Communities and Local Government on 24th July 2018. It was superseded by an updated Framework published on 19th February 2019 (the NPPF). As outlined in paragraph 214 of the NPPF, its transitional arrangements require that plans submitted before 24th January 2019 should continue to be examined against the policies in the previous (2012) Framework. This representation has therefore been prepared against the latest (2019) NPPF.

¹ Section ID: 41

- 1.1.6 In accordance with the Neighbourhood Plan Basic Conditions, Neighbourhood Plan policies should align with the requirements of the National Planning Policy Framework and the wider strategic policies for the area set out in the Council's adopted Development Plan. Neighbourhood Plans should provide a policy framework that complements and supports the requirements set out in these higher-order documents, setting out further, locally-specific requirements that will be applied to development proposals coming forward.
- 1.1.7 The LNP should only be progressed if it meets the Neighbourhood Plan Basic Conditions, supported by a robust and proportionate evidence base.
- 1.1.8 The NPPF is clear that Neighbourhood Plans cannot introduce policies and proposals that would prevent sustainable development opportunities from going ahead. They are required to plan positively for new development, enabling sufficient growth to take place to meet the development needs for the area and assist local authorities in delivering full housing needs. Policies that are not clearly worded or intended to place an unjustified constraint on further sustainable development from taking place are not consistent with the requirements of the NPPF or the Neighbourhood Plan Basic Conditions.
- 1.1.9 The LNP should not seek to include policies in Neighbourhood Plans that have no planning basis or are inconsistent with national and local policy obligations. Proposals should be appropriately justified by the findings of a supporting evidence base and must be sufficiently clear to be capable of being interpreted by applicants and decision makers. Policies and proposals contained in the LNP should be designed to add value to existing policies and national guidance, as opposed to replicating their requirements.

2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the LNP must meet are as follows:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.
- d) The making of the order contributes to the achievement of sustainable development.
- e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- f) The making of the order does not breach, and is otherwise compatible with, EU obligations.
- g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

2.2 National Planning Policy Framework, & Planning Practice Guidance

National Planning Policy Framework (NPPF)

2.2.1 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements of the preparation of Neighbourhood Plans within which locally-prepared plans for housing and other development can be produced.

2.2.2 In 2018, the Ministry of Housing, Communities & Local Government (MHCLG) introduced the first revision of the NPPF which has brought about fundamental changes to the planning system. It was superseded by a further updated Framework published on the 19th February 2019 which makes further changes to clarify the revised NPPF's application, including for example updating paragraph 177 regarding the application of the presumption in favour where appropriate assessments are required on a habitats site and the definition of 'deliverable' at its Annex 2 for five year housing supply calculations.

2.2.3 In relation to the preparation of Neighbourhood Plans, paragraph 13 of the NPPF states:

"The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies."

- 2.2.4 Further guidance on how the Presumption interacts with Neighbourhood Plans is provided in paragraph 14 of the Revised Framework.
- 2.2.5 The NPPF also sets out how neighbourhood planning gives communities the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development. However, neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies contained in higher order documents.

Planning Practice Guidance

- 2.2.1 It is clear from the requirements in the NPPF that neighbourhood plan policies should be prepared in general conformity with the strategic requirements for the wider area, as confirmed in an adopted Development Plan. The requirements set out in the Framework are also supplemented by the Government's online suite of Planning Practice Guidance (PPG). In relation to the preparation of the LNP, the PPG on Neighbourhood Planning is of particular relevance.
- 2.2.2 The PPG emphasises that;
- “...blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence”
- 2.2.3 With further emphasis that;
- “.... All settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”²
- 2.2.4 Accordingly, the LNP will need to ensure that it takes into account the latest guidance issued by the SoS so that it can be found to meet basic conditions (a) and (d).

² Paragraph: 044 Reference ID: 41-044-20160519 (Revised 19/05/2016).

3 DEVELOPMENT PLAN

3.1 Adopted Development Plan

- 3.1.1 To meet the requirements of the NPPF and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.
- 3.1.2 The adopted Development Plan relevant to the preparation of the LNP is the Central Bedfordshire North Local Development Framework, adopted in November 2009 and consisting of the Core Strategy and Development Management Policies Development Plan Document. This document sets out the vision, objectives, spatial strategy and overarching policies to guide development in the north area of Central Bedfordshire up to 2026. This document is out of date against the requirements of the NPPF and specifically its requirement at Paragraph 60 to identify and meet the full housing needs of Central Bedfordshire, informed by a Local Housing Needs Assessment calculated using the Standard Methodology set out in PPG.

3.2 Emerging Local Plan

- 3.2.1 Central Bedfordshire Council is in the process of preparing a new Local Plan for the district. The Plan was submitted to the Secretary of State on the 30th April 2018, ahead of the revised NPPF and prior to the transitional deadline. This plan is now subject to an independent examination by Planning Inspectors and will be tested against the previous (2012) NPPF.
- 1.1 There have been significant delays to the examination as a result of the Inspector requesting additional evidence on the duty to co-operate, landscape, heritage and transport and an update to the Sustainability Appraisal. This was submitted in January 2019 and hearings commenced in May 2019. However, the original Inspector conducting the examination stepped down and was replaced with two Inspectors. Initial Examination Hearings took place between 21 May 2019 and 25 June 2019, and Planning Prospects attended some of those sessions. On 30 September 2019, the Examining Inspector's issued a letter to the Council which raises fundamental concerns over the soundness of the submitted Plan. It also sets out a number of other concerns regarding main issues raised during the Examination (paragraphs 14 and 15). The Inspectors' concerns were reiterated in their letter dated 28 October 2019 which confirms at paragraph 8 that their earlier letter expresses ***'some very serious concerns about the soundness of the Plan.'***
- 3.2.2 At this time there are still significant outstanding objections regarding the Plan's housing requirement and a number of the strategic policies such as the lack of a robust evidence base and flexibility in the approach to deliver the homes needed in Central Bedfordshire (and its neighbouring areas).

- 3.1.3 Representations to the submission Local Plan have set out that the housing requirement in Central Bedfordshire should be significantly higher than suggested by Central Bedfordshire and should the Inspector of the Local Plan find that Central Bedfordshire should be planning for more housing growth we would expect the Council to increase development in the more sustainable settlements across the district, including Langford.
- 3.2.3 Langford is designated as a Large Village in both the adopted Development Plan and the emerging Local Plan. Langford is a Large Village which is regarded as a sustainable location for additional new housing, in recognition of its range of services and facilities available locally and its connections to larger service centres.. Should the housing requirement in the Local Plan increase during the course of the examination as expected, it is likely that further growth will be required in Langford to assist the Council in delivering the Local Plan's housing requirement.
- 3.2.4 For these reasons and to ensure the longevity of the policies of the LNP, Planning Prospects suggest a more positive approach and significantly more flexibility is added to the policies of the LNP, alongside further site allocations to avoid policies of the LNP being superseded under Section 38(5) of the Planning and Compulsory Purchase Act 2004 when the emerging Local Plan is adopted.

4 LANGFORD NEIGHBOURHOOD PLAN

4.1 Context

- 4.1.1 These representations are made in response to the current consultation of the Langford Neighbourhood Plan (v17 November 2019). The Langford Neighbourhood Plan website sets out that comments were due 14 December 2019 but during the Appeal Inquiry for APP/P0240/W/19/3236423 Planning Prospects were informed that the timeframe for comments had been extended until 14 February 2020.
- 4.1.2 Notwithstanding the above, Central Bedfordshire Council's 'Neighbourhood Planning' webpage includes no consultation information for the Langford Neighbourhood Plan and until January 2020 referred only to the successful application for designation of a Neighbourhood Area. In mid-January 2020, Central Bedfordshire published a Screening Report confirming that the Neighbourhood Plan proposal is unlikely to result in significant environmental effects and therefore does not require a Strategic Environmental Assessment. In addition, this statement determines that the Langford Neighbourhood Plan is unlikely to result in significant effects on any European sites and consequently the plan does not require Habitat Regulation Assessment.
- 4.1.3 With the above in mind, Planning Prospects are unaware of the status of the v17 November 2019 draft Neighbourhood Plan or what stage in the Neighbourhood Plan process it falls under.
- 4.1.4 That said, this section highlights the key points that Planning Prospects wish to raise with regard to the content of the LNP as currently proposed and suggest a series of modifications required for the plan.

4.2 Neighbourhood Plan Policies

- 4.2.1 This section of Planning Prospects' representation to the draft LNP is made in response to the LNP's wider considerations, as well as its draft policies, which need to be addressed and amended through modification and/or deleted to meet the Neighbourhood Plan basic conditions, to facilitate a flexible and positive approach consistent with the requirements of national planning policy and guidance.
- 4.2.2 At the outset, Planning Prospects note that the draft LNP sets out two main factors that have driven the need for the Plan. These are:
1. To counteract and manage speculative building of homes in large numbers; and
 2. To secure the optimum amount of funding for the community through S106 obligations

and/or Community Infrastructure Levy (CIL) payments.

- 4.2.3 From the outset, this suggests that the Plan is being progressed to stifle residential development in Langford and is contrary to national planning policy which sets out to boost significantly the supply of homes in support of the Government objective.
- 4.2.4 With this in mind, the LNP sets out that its policies are entirely consistent with the objectives and policies of Central Bedfordshire's emerging Local Plan but since Langford has already 'fulfilled and vastly' exceeded its housing targets as detailed in the emerging Local Plan, it is deemed that no further residential sites need to be identified as part of the LNP.
- 4.2.5 Planning Prospects are promoting land to the west of Langford Road for residential development. The site is identified in the Neighbourhood Plan as an 'opportunity site.' However, this site along with the other 3 'opportunity sites' have been discounted by draft Policy PD1 'Housing Allocations' on the basis that Langford has exceeded its housing obligation as identified in the Central Bedfordshire emerging Local Plan.
- 4.2.6 It is inaccurate for the Neighbourhood Plan to declare that Langford has exceeded its housing needs in reference to Central Bedfordshire's emerging Plan as the true housing need figure required to support Central Bedfordshire's emerging Local Plan remains unconfirmed, with the emerging Plan itself subject to significant objection and fundamental concerns raised by its examining Inspectors. Numerous parties to the examination of the emerging Local Plan consider that the true housing need figure in Central Bedfordshire is considerably higher than provided for in the emerging Plan, which, if accommodated in line with its current spatial strategy, will result in Langford having to support an additional number of homes to ensure that Central Bedfordshire meets its housing needs going forward. With this in mind, LNP draft Policy PD1 needs to be more flexible to accommodate additional sustainable housing growth if required as anticipated.
- 4.2.7 Draft LNP Policy PD3 sets out that residential development schemes should not extend the village (ribbon) envelope to the north or south. Draft Policy PD5 sets out that development should normally take place within the Settlement Envelope, albeit provides some flexibility by stating that this is unless a scheme demonstrates significant community benefit. The NPPF and PPG are clear that blanket restriction of otherwise sustainable development should be avoided (see Chapter 2 above).
- 4.2.8 In addition, Paragraph 4, page 6, of the draft LNP sets out that, since it makes it clear that further large-scale housing developments are not supported in Langford, the emerging Local Plan should be bound in future to support Langford's wishes. This suggests that not only is the LNP not compliant with national planning policy but it is also going to be non-compliant with Central Bedfordshire planning policy.

- 4.2.9 Policy PD2 of the draft LNP identifies a local affordable housing need of 24 Affordable Homes and a market housing need of 15 market homes (based on a Parish Housing Needs Survey) and sets out support for suitable sites that will secure this provision. Whilst Planning Prospects do not consider that this reflects the true needs of Langford this nonetheless identifies a need for more affordable and market homes in Langford.
- 4.2.10 The NPPF sets out that provision of affordable housing should not be sought for residential developments that are not major (defined in the NPPF as sites of 10 or more homes). The Central Bedfordshire emerging Local Plan requires provision of 30% Affordable Housing on qualifying sites, which it principally defines as sites of 11 homes or more.
- 4.2.11 In line with the LNP's stance against large-scale housing developments (comprising 10 homes or more), Policy PD3 of the LNP sets out that permission for small residential developments (of up to 10 dwellings) on infill and redevelopment sites (within the built-up area) will be supported.
- 4.2.12 It is clear that large-scale housing sites (of 10 or more homes) are not supported in the draft LNP.
- 4.2.13 LNP draft policy PD3 goes on to say that affordable housing could be delivered separately, or alongside development schemes where market housing cross-subsidises the Affordable Housing. In light of the above, there is no evidence to support that any Affordable Housing will be delivered from such sites as they will be too small to provide any Affordable Housing (either in accordance with the NPPF's suggested provision from schemes of 10+ homes; or the emerging Local Plan's suggested provision from schemes of 11+ homes).
- 4.2.14 With regard to the second key driver behind the LNP, to secure optimum funding from S106 obligations, Planning Prospects' proposals present a sustainable location for housing development and the ability to provide numerous wider benefits for the community. The NPPF (paragraph 56) sets out that planning obligations must only be sought where they meet all of its tests which are:
- a) Necessary to make the development acceptable in planning terms;
 - b) Directly related to development; and
 - c) Fairly and reasonably related in scale and kind to the development
- The LNP's support for only minor residential development (10 homes or fewer) is of insufficient scale to justify significant (or material) funding towards the local community's identified projects.
- 4.2.15 Planning Prospects' proposals will provide 35% affordable housing which will contribute to the

targets set by draft LNP Policy PD2 'Affordable Housing.' Moreover, the proposals will help to improve highway safety by providing footpath improvements including the widening of the footpath and extension of speed restrictions along Langford Road which directly complies with draft LNP Policy TM2 (part 9) 'Vehicles and Parking' and draft LNP Policy TM3 (part 1) 'Pedestrians, Pavements and Cyclists.' The development would also bring direct benefits to the community through the provision of a children's play area and wider sports and recreation provision for Langford and Biggleswade which directly relates to draft LNP Policy EN2 'Maintain, Develop and Extend Green Spaces and Safe Movement Around Them' and draft LNP Policy IF6 'Leisure and Spiritual Facilities, Clubs, Societies, Community Assets.' Draft LNP Policy IF2 'Schools and Education Facilities' outlines the challenges facing local schools as they are currently moving from a three to a two-tier education system. Planning Prospects' proposals will provide necessary contributions towards education provision throughout the tiered education system.

- 4.2.16 In light of the above, Planning Prospects' proposals demonstrate significant community benefits and considering draft LNP Policy PD5, its location outside of the Settlement Envelope should not count against it. Draft Policy PD3 however does not allow for any flexibility and sets out that schemes should not extend the village envelope. With this in mind draft Policy PD3 needs to be more flexible to accommodate additional sustainable housing growth in Langford.
- 4.2.17 **In summary**, the housing figures quoted in the LNP are inaccurate and its draft Policies are likely to result in much needed residential housing development being stifled in Langford. Its draft Policies therefore need to be more flexible to support new housing developments to meet Langford, and Central Bedfordshire's, ongoing housing needs. Planning Prospects' proposals to the west of Langford Road represent a sustainable housing development that can secure a number of benefits for the wider area and for Langford's existing community.

5 SITE SUBMISSION

- 5.1.1 Planning Prospects are promoting land to the west of Langford Road, Langford for residential development. The 3.11 hectare site presents an opportunity to create a sustainable, high quality residential development in a suitable and sustainable location.
- 5.1.2 We have currently identified the following can be provided on the site:
- Residential area: 1.72ha (up to 55 dwellings @ 32 dph);
 - Informal and amenity open green space including provision of children's play area; and
 - Provision of widened footpath provision along the site's frontage with Langford Road and extension of 30mph speed restriction further north along Langford Road.
- 5.2 The site relates well to the form of the village, which has incrementally expanded over the years including along the principal route through the village (which the site is located on) and is readily accessible by footpath to the village centre and in particular to The Village Store, Langford Pharmacy, Langford Lower School, St Andrew's Church, Langford Post Office and Store, Langford Methodist Church, public houses and takeaway restaurants, all within the 85th percentile distance (1,950m) for walking being the main mode of travel of the site. In addition, a number of the important local facilities are more accessible and better related to this site in this location than other parts of the village to the south, even recently approved developments on the outskirts of the village to the south.
- 5.3 In addition, the site is readily accessible by cycling and by public transport (including by bus and by train) including to higher order settlements where additional facilities, employment and services are provided.
- 5.4 The provision of some further growth in Langford is sustainable in this context. The additional 55 dwellings Planning Prospects is proposing is relatively modest and of a suitable scale for a settlement of this nature, given its range of services. This has been a concern of some local residents in their comments to the proposals and as set out in the draft Neighbourhood Plan. Langford's population however is approximately 3,091¹ of which the appeal proposal's percentage proportion is 4.3%. There are 1,280² households in Langford of which the proposal's percentage proportion is 4.3%. Even added to existing commitments, the overall level of growth for Langford is suitable here. Whilst it is recognised that the emerging

¹ 2011 Census

² 2011 Census

Neighbourhood Plan highlights development pressure as a local concern, the scale of actual committed development is far lower than that stated in the emerging Plan, with figures over stating the scale of growth by including sites which as yet do not have permission and have yet to be formally considered.

- 5.5 Development to the west of Langford Road can be designed to respond positively to good urban design principles such that the proposals can make a valuable contribution to the village and local environment. Planning Prospects' proposal would create a high-quality sustainable development, with strong green infrastructure within the site that would assimilate into the surrounding built and natural environment. This accords with the importance attached to the design of the built environment by the Government and within the draft Neighbourhood Plan.
- 5.6 Careful consideration is given to the site's landscape and visual context, its location on the edge of the village, the relationship of proposed development to existing properties, existing trees and landscape infrastructure as well as opportunities to enhance connectivity in order to create a well-considered and high quality development. New public open space within the proposed development will benefit new and existing residents.
 - 5.6.1 The benefits of residential development of the site are considerable. It will make a significant contribution towards meeting the social elements of sustainability through providing policy compliant affordable housing and will provide much needed affordable homes for the local area. The development proposals will also assist in helping to maintain and enhance the viability and vitality of Langford.
 - 5.6.2 In addition to the delivery of housing, the site would also deliver a number of associated economic benefits such as the New Homes Bonus, construction jobs, an increased employment pool and additional expenditure for local businesses and services.
 - 5.6.3 Planning Prospects' proposals are currently subject of an appeal (APP/P0240/W/19/3236423) following submission, and refusal, of a planning application through Central Bedfordshire Council (CB/18/04783/OUT) for up to 55 dwellings (including 35% affordable housing), landscaping, public open space including children's equipped play area, surface water flood attenuation and vehicular access from Langford Road. The proposal is supported by a full suite of technical documents available on the Central Bedfordshire Council website.

6 CONCLUSIONS

- 6.1.1 Planning Prospects recognises the Government's ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community. However, it is clear from national policy and guidance that the LNP must be consistent with national planning policy and must take account of up-to-date evidence of Local Housing Needs. It must also be consistent with up-to-date strategic policies.
- 6.1.2 Through these representations we have set out why flexibility is needed for the draft policies of the LNP to meet the basic conditions.
- 6.1.3 Further, a number of the policies contained within the plan do not accord with the requirements of the NPPF and require modifications to meet the basic conditions.
- 6.1.4 We have submitted that land to the west of Langford Road, Langford should be allocated for residential development within the Plan. This 3.11 hectare site presents an opportunity to create a sustainable, high quality residential development in a logical and sustainable location. Planning Prospects trust that these representations are helpful and will be taken into consideration but if there are any questions please do contact us.

APPENDIX 1 – SITE LOCATION PLAN



Appendix 6.4.13 Bloor homes and Langford “Triangle” Landowners (Regulation 14)

LANGFORD NEIGHBOURHOOD PLAN – Regulation 14 Consultation

RESPONSE ON BEHALF OF BLOOR HOMES SOUTH MIDLANDS AND THE FOLLOWING LANDOWNERS :

MRS D M ALBONE (1)

D A QUINLAN & S M QUINLAN (2)

R J HEWITT & MS E J HEWITT (3)

F J HUCKLE & MRS G R HENEGAN (4)

J G MEDLOCK & A P BECK & MS S C WORBOYS (5)

R SMITH (6)

INTRODUCTION

The consultation draft document fails to present a clear set of policies and guidelines capable of addressing the issues and concerns identified by residents and lacks a clear focus and clarity, in its current form, for all the reasons set out below. In any event, constraint policies are short term and should not be seen as a bar to future development proposals in the light of the likely requirements in the medium term, including the period post 2035 for which there is no strategic guidance to date.

VISION

The Vision Statement should include a clear unambiguous statement of the proposed plan period as required by S38B(1)(a) of the 2004 Act.

The Vision Statement should also include *‘current and future members of its community’*.

The NP should not be limited to the *‘objectively assessed needs of the community’*. The NP is required to reflect the national policies set out in the NPPF (2019) which includes para 59 *‘to support the Government’s objective of significantly boosting the supply of homes’*. Strategic development plan policies are to be informed by a local housing need assessment, conducted using the standard method in national planning guidance, together with unmet needs from neighbouring areas. This assessment has not been carried out by CBC to date, due to ‘exceptional circumstances’ together with the submitted CBC Local Plan 2035 being prepared in accordance with the NPPF (2012). It is submitted that the LNP must reflect the NPPF (2019), where paragraph 69 encourages Neighbourhood planning groups to consider the opportunities for allocating small and medium-sized sites suitable for housing in their area.

In short Langford is not an island and rather forms part of the wider Ivel Valley, which is identified as a *‘particular focus for development, creating a string of complementary settlements where new development improves their individual and combined sustainability’* (see CSDMP 2009 Policy CS1). This theme of the adopted development plan is continued in the submitted draft CBC Local Plan 2035 which seeks to *‘Deliver ... new homes through villages, moderate extensions to existing towns and villages in line with the provision of new infrastructure and to meet identified housing needs close to key transport corridors’*, which includes the A1/East Coast Mainline corridor. The function of Langford to contribute to this growth strategy should be included within the LNP Vision.

1.5 National Framework and CBC Emerging Local Plan

National Framework

The summary of the NPPF should include the national objective ‘to support the Government’s objective of significantly boosting the supply of homes’ (NPPF paragraph 59) and the advice of NPPF paragraph 69, which encourages Neighbourhood planning

groups to consider the opportunities for allocating small and medium-sized sites suitable for housing in their area.

Emerging Local Plan

The summary of the Local Plan Examination is potentially misleading and should be amended to make it clear that the public examination is ongoing and ‘the Inspector’s’ task is to consider the soundness.

We respectfully submit that the LNP Consultation Draft fails to reflect the CBC Local Plan Vision (paragraph 4.1.1) and the Strategic Objectives as the LNP fails to reflect current national planning policy for new housing.

1.6 Legal Requirements

We welcome the clear statement of the Plan Period from 2019 to 2039 but submit that this should be reflected in the Vision.

Furthermore, the LNP should reflect the consequences of a plan period to 2039, which is four years longer than the CBC Local Plan 2035 and must therefore look beyond the horizon of the CBC Local Plan, particularly in respect of new housing requirements, assessed in accordance with the Standard Method.

1.9 Plan Period, Monitoring and Review

We welcome the commitment to revisit LNP policies every two years, to ensure relevance and to monitor its delivery.

However, we submit that the LNP should expressly acknowledge the commitment of the submitted CBC Local Plan 2035 to undertake a Partial Plan Review to commence within six months of its adoption and complete as soon as decisions have been made on routeing and financial commitment to strategic infrastructure area in the area. The strategic infrastructure investment is expected to include capacity upgrades of the A1, which may include off-line motorway construction north of Baldock, directly impacting on the LNP area.

- **Characteristics of the Parish of Langford**

This chapter of the LNP is deficient in that there is no reference to the National and Local Landscape Character Assessments.

The submitted CBC Local Plan 2035 Policy EE5 – Landscape Character and Value requires all development proposals to have regard to the key characteristics and sensitivities of sites and their setting, as set out in the Central Bedfordshire Landscape Character Assessment. A similar approach is proposed in the LNP policies EN1 and EN2. It is therefore considered to be essential for the LNP to include an accurate and up-to-date Landscape Character Assessment reflecting the National and Central Bedfordshire LCAs, where Langford falls within LCA 4B Lower Ivel Clay Valley and 4C Upper Ivel Clay Valley with strong influence to the east from LCA 5G Dunton Clay Vale.

The LNP would also benefit from a summary map regression illustrating the growth of the village and in particular the coalescence of Water End, Boot End and Flexmore End, with buildings strung along roads (see CBC Landscape Character Assessment para 4C.8).

The LNP mapping should also be updated to illustrate the recent developments including the housing development at Flexmore End, both east and west of Station Road.

The summary information at page 24 of the LNP appears to be disconnected.

2.4 Langford Parish Constraints

This chapter of the draft LNP is unclear and short term. Constraint policies are short term and should not be seen as a bar to future development proposals in the light of the likely ongoing requirements in the medium term including the period post 2035.

2.5 Langford Parish Green Spaces

The Langford Green Infrastructure Map is largely aspirational and the text in this section fails to identify any clear policy commitment or funding to deliver the aspirations including:

T: New Woodlands east of railway

U: Childrens Play Area and allotments (near Ivel Cottage)

V: Create a nature reserve with wildflower meadow, north of Wychway Farm

W: Create a wildlife and country park, east of railway

X: Open public access and create community allotment space and children's play area/park/botanical garden with suitable access (between High Street and Station Road).

In the absence of any clear policy commitments backed by adequate funding to deliver these aspirations, they should be deleted from the submission LNP.

The Langford Green and Open Spaces map is misleading in showing parts of the Langford Triangle with this notation. The land has no public access and is under recent cultivation together with grassland supporting equestrian uses. The "triangle" has a limited public value and is inaccessible to the general public. Public views are limited to those from neighbouring properties and due to the local topography, there are limited locations where the entire site can be seen. There is no public right of access and no public footpaths within the site.

The map should be amended to remove this notation from this area.

2.6 Langford Parish Housing Need

The Housing Needs Survey at Appendix E appears to be superficial and parochial, thereby failing to acknowledge the role of Langford as a Large Village (CSDMP Policy CS1 and submitted CBC Local Plan – Settlement Hierarchy) within the A1/East Coast Mainline Key Transport Corridor, capable to accepting ongoing growth within the LNP period to 2039.

The attempt to limit further growth to 'local needs' conflicts with the national priority to significantly boost the supply of homes. Furthermore, the policy aspiration for new housing development to be limited to infill or small groups of dwellings is unlikely to provide new affordable housing as such development will be below the threshold for affordable housing provision (NPPF paragraph 63).

2.11 Community Priority Projects

The majority of the identified Community Priority Projects will not be delivered in the absence of S106 funding, which will only accompany new major residential development (10 or more dwellings).

The policy aspiration to limit any new development to infill or small groups of development will be unlikely to result in any S106 funding due to the development being below the threshold for development providing S106 financial obligations (see PPG Paragraph 023 Reference ID 23b-023-20190901).

F: Environmental Policies : EN1-EN4

We OBJECT to Map EN1. The Langford Triangle is not a 'Green and Open Space'.

There is no public access and the area is arable farmland under recent cultivation and grassland in equestrian use.

Policy EN1 is misconceived and seeks to introduce requirements for new development proposals which are unrelated to the specific development site. In particular, it is inappropriate to require all new planning applications to 'demonstrate adequate parking provision for schools, healthcare, public amenities, churches, green spaces'. This is not supported by national or local validation requirements and should be deleted.

Policy EN2 is also misconceived and includes advisory text. The policy includes requirements which are not capable of being delivered by the limited scale of development proposed in the LNP.

Policy EN3 is aspirational and includes text which is justification rather than policy based. Furthermore, proposed development of less than 1ha area, within Flood Zone 1 is not required to demonstrate investigation of and attention to issues of river, flood plain and on-road flooding. This policy is not supported by national and local planning policies and technical requirements.

Whilst the respondents accept that it is vital to maintain the character of the village, we would submit that the inner triangle referred to in Policy EN4 has never been identified as 'Important Green Space' and in particular is undesignated on the Langford Green

Infrastructure Plan (April 2011) with the exception of limited areas described as 'Permanent Grasslands', some of which have been under arable cultivation.

The "triangle" has a limited public value and is inaccessible to the general public. Public views are limited to those from neighbouring properties and due to the local topography, there are limited locations where the entire site can be seen. There is no public right of access and no public footpaths within the site.

Furthermore, the LNP cannot presume to prejudge any future proposals for the 'inner triangle' or a northern extension.

Infrastructure Policies : IF1-IF6

Policy IF1 continues the aspirational tone noted above and is disproportionate to the level of development supported elsewhere in the plan. The thrust of Policy IF1 may be appropriate to new 'major' development proposals, but is inappropriate for all development proposals.

Policy IF2 suffers similarly and seeks to make disproportionate demands. 'New development' applications includes householder and minor applications for a range of proposals where schools and education facilities are not a material consideration. The text should be amended to refer to new 'major housing' development (ie. 10 or more dwellings). The provision of schools and education facilities is not normally material for non-residential development including employment, shopping, leisure or community uses, all of which are included in 'new development'.

Policy IF3 should also refer to 'new major housing development'. Other non-residential proposals are unlikely to result in changes in local population.

Policy IF4 should omit references in policy text to proposals of Anglian Water over which the LNP has no control. The policy should also not repeat policy provision in the submitted CBC Local Plan 2035, which may be subject to change thereby resulting in policy conflicts. It is unreasonable to require an applicant to demonstrate the adequacy of electricity supply for current population and future expansion of the village, unrelated to the scope of any specific development proposal small or large. It is also beyond the power of LNP to require conformity with the Broadband Universal Service Obligation and to **install** superfast broadband on any new development. Building Regulations simply require **provision** for broadband installation. In any event broadband may not be required for 'any new development'. Finally, it is beyond the power of a developer or landowner to deliver 'quality, speed and robustness of the telecommunications network' within the parish. These proposals should be omitted.

Policies IF5 : Economic Growth and IF6: Leisure and Spiritual Facilities, Clubs, Societies Community Assets are applauded but appear to overlap. These policies could be combined into a single policy. It is beyond the power of the LNP and most developers to facilitate new Clubs and Societies.

Transport and Movement Policies : TM1-TM4

The objectives of this section of the draft LNP are broadly supported.

However, the requirement of Policy TM1 to require a Travel Plan for all development proposals for 10 new dwellings and above is not supported by CBC, where a TP is required at a significantly higher threshold. Bedfordshire County Council was long since abolished. The local highway authority is Central Bedfordshire Council. The draft policy lacks any local requirement and should be deleted as such matters are adequately addressed at CBC Local Plan level.

Policies TM2 and TM3 are aspirational and not NP policy. It is wholly unclear how the LNP will deliver the policy intentions including changes to marking of existing major roads and promote supervised 'bike trains' to encourage safe cycling to schools in Langford and Henlow.

Policy TM4 is also aspirational and unsuited to a LP seeking to address development and land use.

Planning and Development Policies : PD1-PD5

The objectives of this section of the draft LNP are broadly supported but overlook the evolution of the identity and character and appearance of the area, in that Langford is no longer a ribbon village, but rather has developed in depth in a number of parts of the village.

Furthermore, in the absence of any form of Landscape Character Assessment there is no clear, cogent baseline from which to judge Objective 2.

The LNP in its current form fails to meet Objective 3, for the reasons set out earlier; namely its failure to reflect NPPF paragraphs 59 and 69 in particular.

Objective 5 is unclear, as local expectations are ill defined and will change over time, making this unsound and vague.

Objective 6 is strongly supported.

Planning and Development Policies : PD1-PD5

PD1 – Housing Allocations – The land off Cambridge Close (HAS30/HAS31) allocated in the Submitted Draft CBC Local Plan 2035 already benefits from a resolution to grant planning permission subject to S106 Agreement. In the likely event that planning permission is granted, there is no need for the LNP to allocate this site for development as it will be an existing commitment.

Criteria 2 is misconceived as the Submitted Draft CBC Local Plan 2035 does not set out any 'housing targets' for the Langford Parish. Criteria 3 is also unsound for the same reasons. It is submitted that these criteria amount to a failure of the LNP to accord with NPPF paragraphs 59 and 69.

Criteria 4 is unnecessary since development plans must be read as a whole and proposals are subject to the provisions of all relevant policies. The criteria does not provide a clear and unambiguous statement to assist the decision maker in determining a planning application.

It is submitted that Policy PD1: Housing Allocations should be redrafted to confirm that the LNP makes no new housing allocations, if this is the wish of the Parish.

Policy PD2: Affordable Homes - The policy should not include a definition of 'affordable homes' as this conflicts with the National Planning Policy Framework which sets out a detailed definition in the glossary. The reference to the Housing Needs Survey should not form part of the policy.

Paragraph 3 of the draft policy is noted but the term 'affordable market housing' is not recognised. The NPPF Glossary includes 'discounted market sales housing' as a sub-class within the overall term 'affordable housing'.

The section numbering within Policy PD2 requires rationalisation. Section 4 deals with market housing, which should be a separate policy as this is not part of 'affordable homes'. Market housing cross-subsidising affordable housing is unlikely to be delivered for small sites. The LNP cannot require affordable housing for developments that are not major developments (defined as 10 or more homes or an area of more than 0.5ha), which would be contrary to national planning policy.

Policy PD4: Residential Design - The policy repeats the local objective to limit new development to small scale development (up to 10 units), which will not deliver any affordable housing. Criteria 4 is misconceived as small-scale developments (up to 10 units) is unlikely to deliver developments including alternative tenures.

Criteria 10 sets out parking standards. Special justification should be given in the event that Langford Parish wishes to depart from the CBC Parking Standards. Furthermore, it is unlikely that small-scale developments will include proposals for public parking provision for the purposes set out in the last paragraph of Section 10.

Policy PD5 : Development Scope and Housing Density – This policy is misconceived, in particular Langford is not situated within Green Belt and references to 'Green Belt' in criteria 2 and 3 should be removed. Criteria 4 is also contrary to national planning policy which does not support the requirement for affordable housing for small developments (up to 10 dwellings). Criteria 4 is therefore undeliverable. Criteria 5 is unsound and both should be deleted. Highway safety is adequately addressed in the National Planning Policy Framework and the Submitted Draft Central Bedfordshire Local Plan 2035.



Langford Neighbourhood Plan

Langford Neighbourhood Plan

Appendix 6.5: Supporting consultee documents

Regulation 14 Consultation

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Appendix 6.5.1 Anglian Water

----- Forwarded message -----

From: **Patience Stewart** <sPatience@anglianwater.co.uk>

Date: Mon, 9 Mar 2020 at 21:47

Subject: Langford Neighbourhood Plan - Formal Consultation (Regulation 14)

To: langfordneighbourhoodplan@gmail.com <langfordneighbourhoodplan@gmail.com>

Dear Sir/Madam,

Thank you for the opportunity to comment on the Langford Pre-Submission Draft Neighbourhood Plan. The following comments are submitted on behalf of Anglian Water.

I would be grateful if you could confirm that you have received this response.

Waste water treatment (page 38)

Reference is made to blocked sewers and smells emanating from existing pumping stations.

Where blockages occur we have a responsibility to ensure that these are cleared so we can continue to serve our customers. We actively work with our customers to prevent items entering the sewer network as the majority of blockages are preventable.

Further details of our Keep It Clear Campaign are available to view on our website:

<https://www.anglianwater.co.uk/environment/how-you-can-help/keep-sewer-pipes-clear.aspx>

Where issues occur within the sewer network we would encourage customers to report them to Anglian Water so that we can investigate and take appropriate action. The telephone number for reporting sewer flooding is 03457 145 145.

Policy IF1: Information Required to Support Village Infrastructure in Planning Applications (page 58)

Point 1 – Anglian Water is actively promoting increased water efficiency and water re-use as part of new residential developments as part of our Green Water Programme (<https://www.anglianwater.co.uk/developers/development-services/green-water/>).

Reference is made to rainwater harvesting but not surface water harvesting (where surface water is captured in a pond or tank for re-use) in the Policy EN1 and grey water recycling as referenced in Policy IF4.

It is therefore proposed that Policy EN1 is amended as follows:

‘Actively consider the use of **water re-use measures (e.g. rainwater and surface water harvesting and grey water recycling** for non-potable use.’

Policy IF4: Utilities and services - water (page 64)

Point 1 – reference is made to major development proposals demonstrating that they have access to potable water.

Water resources are managed by Anglian Water on a larger scale than individual development proposals. It is therefore suggested that Policy IF1 is amended to refer potable water supply required to serve the development.

Point 2 - Anglian Water would comment on the available capacity at the receiving Water Recycling Centre to receive additional foul flows as part of the planning application process.

The Environment Agency as our environmental regulator are responsible for ensuring compliance with the environmental permits issued for WRCs.

Point 3 - reference is made to policy CC1 of the emerging Central Bedfordshire Local Plan which includes the optional water efficiency standard and is supported.

Point 4 - Anglian Water supports the reference made for new development proposals to include grey water recycling being considered favourably. We are actively promoting the inclusion of water re-use measures including grey water recycling, in residential development as part of our Green Water Programme.

(<https://www.anglianwater.co.uk/developers/development-services/green-water/>).

It is therefore proposed that Policy IF4 be amended as follows:

'1. Given that Anglian Water have stated that a new transfer route from their Ruthamford North zone to Ruthamford South is required by 2025 to ensure the continuing availability of potable water, major development proposals should demonstrate adequate access to potable water **supply to serve the development**.

2. Anglian Water have indicated that Clifton WWTW ~~cannot currently handle significant increases in waste inputs~~ **has limited capacity for additional growth** and will be non-compliant due to growth by 2030. They have yet to confirm the destination of Langford sewage and available future capacity at local treatment works. Applicants should ensure and confirm that capacity and compliance is in place for all new developments.'

4. New development applications that include plans for **water re-use measures including** grey water recycling, will in this respect be considered favourably.'

Appendix F: Design and specification for water efficiency

Reference is made to a design specification for water efficiency and grey water recycling.

It would be helpful to set out the source of the information provided for water efficiency and grey water recycling as this is not stated and how the water efficiency specification relates to the requirements of the emerging Central Bedfordshire Local Plan.

Consideration should be given to referencing water reuse more generally in Appendix F with rainwater harvesting/greywater recycling used as examples.

The use of grey water recycling is not limited to multi occupancy properties as there can be water reuse options applicable for different dwelling types (and for both individual properties and community scale systems).

The benefits which are identified only mention greywater systems but are also relevant for rainwater harvesting (e.g. reducing use of potable mains water, and reducing impact on downstream drainage/surface water networks). This also the case for the uses stated (toilets, irrigation).

It is therefore suggested that the text be amended to make this clear.

I would be grateful if you could confirm that you have received this response.

Should you have any queries relating to this response please let me know.

Regards,

Stewart Patience, MRTPI

Spatial Planning Manager

Telephone: 07764 989051

Anglian Water Services Limited

Anglian Water, Thorpe Wood House, Thorpe Wood,
Peterborough, Cambridgeshire. PE3 6WT



Our Ref: MV/15B901605

18 February 2020

Central Bedfordshire Council
Via email only

Dear Sir / Madam
Langford Neighbourhood Plan Regulation 14 Consultation
February – March 2020
Representations on behalf of National Grid

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed by or in close proximity to National Grid assets

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

avisonyoung.co.uk

Avison Young is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB

Regulated by RICS

Distribution Networks

Information regarding the electricity distribution network is available at the website below:
www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

avisonyoung.co.uk

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgrid.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team
Block 1
Brick Kiln Street
Hinckley
LE10 0NA
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

avisonyoung.co.uk

Saffron Health Partnership

Questions:

1. How many patients does your practice have in Langford?

Approx 3500

2. What additional space requirements do you need in the next 5 years in Langford or to serve an increasing population of Langford residents?

More consulting rooms, improved transport links, improved parking

3. What do you consider are the strengths and weakness in Langford for your practice?

Strength - The team
Weakness - The building

4. What would you like Langford to offer/provide for your practice?

If more patients register, we receive more funding and therefore we can build the team to cope with pressures, larger practice attract more GPs.

5. What resources would help to support/improve or service delivery in Langford:

- ☒ a. Bespoke premises?
- ☒ b. More reliable or faster broadband?
- ☐ c. Housing for staff?
- ☒ d. Improved mobile 'phone reception?
- ☒ e. Improved public transport links?
- ☒ f. Improved parking at/near to premises?
- ☐ g. Other?

6. What are your plans to continue or develop your service delivery?

To increase provision by 50%.

SHP

Appendix 6.5.4 Ivel Medical Centre

Ivel Medical Centre

23/5/19

Dear Mr Shipman

Thank you for your email asking for our comments on the above. I am a GP at the Ivel Medical Centre one of the two practices in Biggleswade. Unlike Saffron Health Partnership we do not have a base in Langford and all our patients are seen at the Ivel Medical Centre in Chestnut Avenue. There is a small amount of on site parking for patients-the remainder of patients park in the public car parks nearby. I understand that parking is a recurring concern for patients accessing our building, particularly those with reduced mobility.

In common with all GP practices we have been struggling to recruit new medical staff to enable us to care for the already growing population in the Biggleswade area. Our capitation has already increased by 3000 patients since our move to these premises in 2016. Any large influx of patients would potentially destabilise the practice unless this manpower issue is addressed, although I realise this is outside your remit!

With regard to access to Biggleswade there is a national move towards extending the hours of availability so that appointments may be offered up to 8 pm and at the weekend. Obviously this is something to consider when reviewing transport links outside peak times.

Another initiative nationally is the development of remote consultation models including online and telephone consultations. This requires excellent broadband and telephone coverage to work safely and effectively. This method of consultation is likely to increase substantially in the future.

I hope this answers your questions. If I can be of further assistance please feel free to contact me.

Kind regards

Jane Hartree

Dr Jane Hartree
Ivel Medical Centre
Chestnut Avenue
Biggleswade
Beds
SG18 0RA

01767 312441

www.ivelmedicalcentre.co.uk



Clerk to Langford Parish Council
75 Wilsheres Road
Biggleswade
BEDS
SG18 0DN

Your ref:

Our ref: LANG/SEA/20

Date: 15/01/2020

Dear Ms. Albone

SEA Screening Determination of Langford Neighbourhood Plan

In accordance with Regulation 9 of the SEA Regulations 2004, Central Bedfordshire Council, as the responsible authority, has determined on **15th December 2020** that a **strategic environmental assessment (SEA)** of the emerging Langford Neighbourhood Plan **is not required** as it is unlikely to have significant environmental effects.

As part of this SEA screening, Habitat Regulations screening was undertaken because plans that are likely to have significant impact on European Sites require a Strategic Environmental Assessment in addition to an Appropriate Assessment (Habitat Regulation Assessment). This screening concluded that the Langford NP is unlikely to have significant impact on European sites and therefore the **Langford NP does not require a full HRA to be undertaken**.

In making this determination, the Council has had regard to Schedule 1 of the Regulations and has carried out consultation with the statutory consultation bodies. An assessment against Schedule 1 of the Regulations and comments made by the consultation bodies are set out in the attached SEA Screening Determination Statement.

The above determination was made based on information provided by Langford Parish Council on the content of the emerging Plan, in this instance: the draft Langford Neighbourhood Plan submitted to the Council on 28th October 2019.

Should the content of the Final Submission Plan be revised and/or there is a material change in the environmental characteristics in the locality (e.g. any new or any changes to nature conservation designations), then the screening process will have to be reviewed and determination reconsidered to take account of the changes.

Central Bedfordshire Council
Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ

Telephone 0300 300 8301
Email customers@centralbedfordshire.gov.uk
www.centralbedfordshire.gov.uk

Mr John Shipman

Direct Dial: 01223 582746

This may result in changes to the above determination. It is Langford Parish Council's responsibility to inform Central Bedfordshire Council about any changes before the final submission of their Neighbourhood Plan.

A copy of the statement will be available in due course for inspection at the Council website at:

https://www.centralbedfordshire.gov.uk/info/45/planning_policy/473/neighbourhood_planning/3

It will also be available on request at: Central Bedfordshire Council, Priory House, Monks Walk, Chicksands, Shefford, SG17 5TQ.

Yours sincerely

Tom Price

Neighbourhood Involvement Officer

Direct telephone 0300 300 6784

Email tom.price@centralbedfordshire.gov.uk

CC:

Environment Agency

Historic England

Natural England

Central Bedfordshire Council

Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ

Telephone 0300 300 8301

Email customers@centralbedfordshire.gov.uk

www.centralbedfordshire.gov.uk

Appendix 6.5.6 Natural England

Date: 14 February 2020
Our ref: 308465

langfordneighbourhoodplan@gmail.com

BY EMAIL ONLY



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam,

Langford Neighbourhood Plan - Formal Consultation (Regulation 14)

Thank you for your consultation on the above dated 10 February 2020

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully

Danielle Priestner
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

Appendix 6.5.7 Historic England

Langford Neighbourhood Plan Steering Group

Our ref: PL00683308

5 March 2020

Dear Mr Shipman

Draft Neighbourhood Plan for Langford

Thank you for consulting Historic England about your draft Neighbourhood Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. We are therefore pleased to have the opportunity to review your neighbourhood plan at this early stage.

Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers - be they interested members of the public, planners or developers - regarding how the place should develop over the course of the plan period.

Paragraph 185 of the National Planning Policy Framework (2019) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.

At present, we are concerned that Langford's neighbourhood plan does not contain sufficient information in order to meet its own objectives as stated on page 47, and does not reflect a positive strategy as required by national policy. While we are pleased to note that the conservation of the historic environment is a top objective for the neighbourhood plan, more detailed information on what this means, what the historic environment of Langford specifically comprises, and specific policy provisions that set out to conserve or enhance its significance is needed. We note that the phrase 'heritage asset' appears only twice, while none of the environmental policies deal specifically with the historic environment. There is no mention of listed buildings, of which Langford contains four, including the Church of St Andrew that, at Grade I, is of very high significance.

The conservation officer at Central Bedfordshire Council will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets. Although the neighbourhood area does contain a number of designated heritage assets, at this point we don't consider there is a need for Historic England to be involved in the detailed development of the strategy for your area, but we offer some general advice and guidance below.

The government's [National Planning Practice Guidance](https://www.gov.uk/guidance/neighbourhood-planning--2) <<https://www.gov.uk/guidance/neighbourhood-planning--2>> on neighbourhood planning is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a *neighbourhood* scale. Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character. Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <<https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>>

The plan could also include consideration of any Grade II listed buildings or locally-designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement. We would refer you to our guidance on writing effective neighbourhood plan policies, which can be found here: <<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/>>

If you have not already done so, we would recommend that you speak to the staff at Central Bedfordshire Council who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also non designated locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may be available to view on-line via the Heritage Gateway (www.heritagegateway.org.uk <<http://www.heritagegateway.org.uk>>). It may also be useful to involve local voluntary groups such as a local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan, particularly in the early evidence gathering stages.

Your local authority might also be able to provide you with more general support in the production of your Neighbourhood Plan, including the provision of appropriate maps, data, and supporting documentation. There are also funding opportunities available from Locality that could allow the community to hire appropriate expertise to assist in such an undertaking. This could involve hiring a consultant to help in the production of the plan itself, or to undertake work that could form the evidence base for the plan. More information on this can be found on the My Community website here: <<http://mycommunity.org.uk/funding-options/neighbourhood-planning/>>.

The neighbourhood plan is an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the positive elements, and address any areas that negatively affect that character and appearance. An historic environment section of your plan could include policies to achieve this and, if your Conservation Area does not have an up to date appraisal, these policies could be underpinned by a local character study or historic area assessment. This could be included as an appendix to your plan. Historic England's guidance notes for this process can be found here: [HE Advice Note 1 - conservation area designation, appraisal and management](https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/) <<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>>, and here: <<https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/>>. The funding opportunities available from Locality discussed above could also assist with having this work undertaken.

The NPPF (paragraphs 124 - 127) emphasises the importance placed by the government on good design, and this section sets out that planning (including Neighbourhood Plans) should, amongst other things, be based on clear objectives and a robust evidence base that shows an understanding and evaluation of an area, in this case the Parish of Langford. The policies of neighbourhood plans should also ensure that developments in the area establish a strong sense of place, and respond to local character and history by reflecting the local identity of the place - for instance through the use of appropriate materials, and attractive design.

We note the inclusion of Transport policies TM1-4, and welcome the intention to minimise impacts on heritage assets. We would recommend that the plan include requirements that any new development is designed in accordance with Manual for Streets and Manual for Streets 2, which is the government's best practice for highway infrastructure design. Hamilton Baillie Associates "Toolkit for Traffic in Villages" is also a very useful document to review in this context, and we would also suggest reference to Historic England's Streets for All advice, which can be found on our website (<https://historicengland.org.uk/images-books/publications/streets-for-all/>). Amongst other things, both Manual for Streets and Streets for All provide useful advice on minimising the visual impact of highways infrastructure in historic areas - for example, minimising the use of bright double yellow lines, and reducing street clutter.

Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces, as encouraged by national planning policy. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them, or aimed at managing development around them. Locality has produced helpful guidance on this, which is available here: <https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces>.

You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: <http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/>.

Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as pavement surfaces in historic places, historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can either have access to this money or influence how it is spent through the neighbourhood plan process, setting out a schedule of appropriate works for the money to be spent on. Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here: <https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/>

Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful. These can help you to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. This can be found here: <https://historicengland.org.uk/advice/planning/plan->

[making/improve-your-neighbourhood/](https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/)>. Historic England Advice Note 11- Neighbourhood Planning and the Historic Environment, which is freely available to download, also provides useful links to exemplar neighbourhood plans that may provide you with inspiration and assistance for your own. This can be found here: [<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/](https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/)>

The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan, or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:

HE Advice Note 2 - making changes to heritage assets: [<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/](https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/)>

HE Good Practice Advice in Planning 3 - the setting of heritage assets: [<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/](https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/)>

If you are considering including Site Allocations for housing or other land use purposes in your neighbourhood plan, we would recommend you review the following two guidance documents, which may be of use:

HE Advice Note 3 - site allocations in local plans: [<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/](https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/)>

HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment : [<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/](https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/)>

We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.

Finally, we should like to stress that this advice is based on the information provided by Langford Parish Council in your correspondence of 10th February 2020. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'E. James', is written over a light blue, semi-transparent watermark that repeats the words 'electronic' and 'element' in a grid pattern.

Edward James

Historic Places Advisor, East of England

Edward.James@HistoricEngland.org.uk

cc:



Langford Neighbourhood Plan

Appendix 6.6

Responses to Regulation 14 Consultation:

Langford Neighbourhood Plan, November 2019 – March 2020

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
2	Resident	TM2 TM3 IF6 IF2	This looks like an exceptional piece of work put together by some very committed villagers who should be applauded. 1. There are many things I fully support and I trust that when it's agreed CBC and wider authorities adopt what the village have said and asked for, that has to be a real commitment from all. 2. I do wonder about some of the connectivity within the plan, something of note being a request to spend 106 money for a larger car park for the village academy yet also more desire to see better foot ways, cycle paths etc. Will a larger car park really help longer term commitment to the environment and villagers health & well being? As I say, it feels like just a little more connectivity for the longer term plan and not just a quick fix which probably elevates the real issue even more. 3. I also wonder about the involvement and proposals for young adults, those no longer in education, perhaps in an apprenticeship or first job, what do they need and want? I don't think this 18-25 (ish) year old group have much to do and generally have to go out of the village for work, leisure and entertainment- feels liked a missed group? Yet overall, well done!	General support. S106 is agreed between developer and planning officers Before planning applications. LNP needs to have a greater influence on topics for inclusion. LNP could include encouragement of local business to employ more young people.
3	Resident	EN3, IF1, TM2, EN2	1. It's a really good plan..thank you. It covers everything from our concerns re the rapid overdevelopment via large housing estates plus the related infrastructure to the importance of keeping the rural character of the village. It also covers concerns about mobile phone signals broadband speed ..the quality of the water and the importance of the lvel..and the speed of vehicles through the village, litter, antisocial behaviour and dog mess. ! Thank you	General support.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
5	Resident	PD1, PD3	1. I have read the LNP in depth it is apparent that housing is the major issue as it affects so many other issues such as roads, transport, schools, green space and amenities. 2. Reviewing all the statistical data clearly demonstrates Langford has already exceeded its quota, providing far more housing development than is required. Almost 300% above quota if you ignore the potential housing development sites identified in the plan. Having attended the CBC meetings in relation to housing development applications it is clear that as a direct result of the government overruling the CBC and in turn the CBC overruling the Parish council, the end result is development to suit quotas rather than genuine consideration for the villagers and the environment in which they live. 3. It must be accepted that Government and the CBC have quotas to deliver and it appears that Langford is seen as a 'Soft Target' for CBC. The LNP as it stands takes on board the views of the Langford residents and provides for some further housing development at the same time as identifying areas of 'green space' that should be preserved in order to maintain a balance for all, in line with the rest of the nation. The LNP is a government initiative that needs to be agreed and used as the guidelines for any further development. 4. Langford is in danger of losing its village status and becoming a simple suburb of Biggleswade as continued growth takes us closer and closer or indeed a town in its own right.	General support. General support. General support. Noted.

6	Resident	EN2, IF1, EN2 EN3	1. I am completely in agreement that the biggest issue for Langford residents is the rapid expansion of the village through large-scale developments on both allocated and windfall land. There are several shocking statistics revealed in the Plan, including 0.5% green space compared to the England average of 2.2% which highlights the urgent need the green space protection, and also zero parks and gardens compared to the England average of 1.4% (2.5, page 26). 2. Also revealed in the draft Plan are the serious concerns regarding the supply of potable water and also Anglian Water's ability to deal with waste water and frequent blocked sewers in the village (pages 36/37). Policy EN3, point 3 on page 56 is particularly relevant - the lower section of the High Street floods and puddles badly in heavy rain and any building development on the 'Triangle' would significantly add to this. 3. Policies EN1-4 are all imperative to protect and enhance the village environmentally. Of particular importance are EN1, point 3 (maintenance	General support, but green space should be expanded for access where possible. <u>October 2020:</u> The High Street from near The Leys to near Ivel Close has been resurfaced and has had extra drainage grids constructed along this section on the east side. Hopefully this will address this flooding and puddling. However, rain over the weekend of October 3 & 4, 2020, suggests this is not the case (see photo) and representations have been made to CBC by residents affected by continued puddling alongside and on the pavements.  General support.
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		EN1 to EN4	of existing Parish green spaces); EN2, points 1-3; EN3, point 3; all of EN4. There is also desirability for allotments within the village and maybe this would be a good use for some of the open green spaces which are in danger of development?	Much can be gained by self-help groups taking the Initiative for allotments etc.
		IF4	4. Re Infrastructure, page 58 “The impact of any development must not be considered in isolation” sums up the future for the village.	General support
			5. The infrastructure policies have been well thought out and formulated, taking into account the needs of the wide range of village residents, and addressing the six identified key areas. As stated on page 58 “The impact of any development must not be considered in isolation” as it is the cumulative effect of multiple large developments that have a detrimental result on the village infrastructure.	General support
		TM1	6. I disagree with the response to the enquiry to UK Power Networks regarding electrical supply/network failure on page 64 as, subsequent to the issued statement, there was a series of short outages one afternoon in August which were sufficiently significant to damage our alarm control box, resulting in a £400 repair bill, so electrical supply is definitely an issue.	Noted
		TM2	7. Re Transport and Movement Policies, it will be interesting to see how the installation of traffic lights at the railway bridge to accommodate the Cambridge Road development will impact on village residents.	Noted
			8. Policy TM2, point 10 “a one way system through Station Road and High Street” would lead to increased vehicle speeds (Litlington near Royston is an example) and also increase journey lengths and times leading to more pollution in the village. I agree with point 11, to examine reducing the speed limit to 20 mph throughout the village, especially to beyond the bend by Londis/Post Office.	Noted
			9. Policy TM4, especially point 1. Improvements to the bus services, especially extending the Biggleswade service into the early evening to accommodate commuters, would encourage villagers to use them.	General support
		TM4	10. The Planning and Development Policy objectives in section 6 sum up my personal desires for Langford and, I suspect, for the majority of the village	

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		PD1	residents. The statistics in PD1 reveal shocking growth and excess quota figures.	General support
		PD2, PD3, PD4	11. Allowances must be made for affordable housing for young village residents in the future as identified in PD2. The principles of PD3 and PD4 are sound and must be adopted to allow time the residents of the recently approved large developments to assimilate into the existing community and for the village to adapt and absorb this influx. 12. In summary, this is a thorough, well-formulated document which I hope will be adopted as policy and, as such, will be implemented by the CBC and also further endorsed by central government.	Noted General support

7	Resident		The plan is comprehensive and serves the interest of the village well in many areas. The team should be commended for their hard and detailed work. Some comments that may or may not be of use. 1. Concerning environmental value: I am in full agreement that the parks that have been recently built are not fit for purpose for the entirety of potential village users - they have been designed to fulfil poorly worded government criteria and are sited in a way that makes them exclusive to the newly built 'communities. 2. Regarding flood-risk (flood plain) - could more be made of the fact that the parameters in which these projections are made are within environmentally 'normal' circumstances, which the majority of the scientific community would accept we are no longer in. Therefore could more be made of the potential for flood-risk management (and potentially reduce the potential for building on these sites)? 3. Regarding the loss of the triangle and green space - I don't think anyone would suggest that Langford is an ugly village, but what we do know is that access to green space, whether 'wild' or 'managed' is important to young children's holistic development as well as all of our wellbeing. Studies from psychology and education show that access to green spaces significantly improves wellbeing, reduces anxiety (which is a youth epidemic) and supports the holistic development of cognitive, socio-emotional and physical characteristics. The diminutive free access to green space ought to be a significant concern for CBC as well as LPC; I think it could be reasonable to use stronger language here and (if required) to support it with evidence that local government are likely to pay attention to - convert the lack of wellbeing into increased demand on local services, NHS, etc. 4. Further to this, regarding water management - rain harvesting can be done on a house-to-house basis, as could the suggestion of trialling compostable toilets - could we suggest an arrangement/grants with the water company to trial these in the village? That would significantly reduce water usage in every household. Regarding the River Ivel, in addition to the immediate above comment, a rather outlandish plan would be to re-open the Ivel as a navigable river to the Ouse at Roxton. Potentially, opening up the village, and the picturesque landscape, to more amenity, shop and public-house	General support. Noted October 2020: We have now included responses to surface water flooding and other watercourses and modified policies in light of these issues and climate change. Noted. The Environment Agency in this area have an active policy to remove structures from the River Ivel to save money and to renaturalise the river and we therefore think it inconceivable they would agree to it
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		General	users. It could also potentially generate minor employment/volunteer opportunities for lock keepers and a visitor centre. 5. Final comment, language regarding village economy - I wonder whether it might work in the favour of the plan to use a more cooperative and sustainable language. We know that in smaller communities, cooperatives are more successful and flourishing than a rabid competitive approach. 'Cooperative' can be defined loosely of course, but it would show that there are characteristics of the village that make them just that, a village, and not a town or the floors of a stock exchange. Just a thought, and of course - please ignore all of the above. If the plan has made me do anything, it is to think of the possibilities for the village, thank you for that opportunity.	becoming navigable again from Langford to Roxton. Noted.

8	Residents drop-in session 1: 19/02/2020	PD4	1. The Design Guide/Code is an excellent document and needs a wider dissemination to residents and developers.	General support. Document available on website.
		TM4	2. There needs to be better connectivity between bus services and train services at Biggleswade and Hitchin.	General support.
		General	3. The policy documents reflect the significant needs of the village.	General support.
		PD3	4. The planning policy suggests the use of smaller developments and this aspect needs strengthening.	Agreed.
		IF1	5. If developers want to build large numbers of houses, then the current infrastructure cannot cope and the pay back for the village should be more tangible and significantly larger than it is. If this threatens the viability of the building, then the developers should look elsewhere	General support.
		TM4	6. The recent problem with a bus company ceasing their service through Langford emphasises the fragility of the transport structure. How will the successor make it more viable and how long will it be before they quit?	General support.
		General	7. The LNP needs better publicity as many folks still do not know about it. In fact, one resident of ten plus years did not know we had a village hall!	Progress widely publicised through events, Langford Diary, Facebook, banners and website.
		EN1	8. Access to open green space is important and attempts to restrict access should be challenged. This is a reference to the residents in one close who wish to gate their privately owned access road which would reduce access to an open green space.	Noted
		PD2	9. Affordable housing for Langford residents is an important issue and this should be extended or protected as a priority over families who are being re-homed from Luton and Stevenage.	General support.
		EN1	10. Open, green space is important to those who live at the south of the village and more public space here would be an asset as the current playing field is a long way to travel for young children.	

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		IF1, IF5	11. The village store and post office is a valuable thing and provides a good service to those who do not have access to cars to go to Biggleswade. How can this be protected?	Noted as an aspiration
		PD2	12. Affordable housing should spread around new estates and not lumped into one corner where it becomes obvious that it an area for low-cost housing with people on low incomes. The affordable housing could look more attractive and fit in better with the styles of houses in the neighbourhood.	General support.
		EN1	13. There should be guidance and better encouragement for householders to have green energy installed on their roofs (solar panels).	General support for Design Codes.
		PD5	14. What guarantees are there that CBC and developers will take notice of the LNP when it is approved and adopted?	General support.
				Noted.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
9	Residents drop-in session 2: 25/02/2020	PD4 General IF1 PD2	1. The Design Guide/Code is an excellent document and needs a wider dissemination to residents and developers. 2. The policy documents reflect the significant needs of the village. 3. The current infrastructure cannot cope and the pay back for the village should be more tangible and significantly larger than it is. If this threatens the viability of the building, then the developers should look elsewhere. 4. Affordable housing for Langford residents is an important issue and this should be extended or protected as a priority over families who are being re-homed from outside Langford.	General support. Document available on website. General support. General support. General support.
10	CBC Development Management	P23 - Map Key	1. What is a 'Potential' site as opposed to an 'Allocated' or 'Windfall'? If the former are proposals yet to be approved and the others have already been approved/allowed, it might be useful to make this clear with additional annotations or mention that these sites have been identified through screening requests or outstanding refusals/appeals	Agreed. Map changed to new version.
	CBC Development Management	P25	2. Flood Risk map - If this is EA flood mapping, if so, it may not cover surface water flood risk. Useful to add surface water risk info or a caveat as to what flooding forms are included and what is not detailed given NPPF paras 157-8	Surface water maps inserted. Ref to NPPF to update.

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	CBC Development Management	P29	3. Map repeated from p23 - delete?	Copy moved to Background Evidence Appendices.
	CBC Development Management	P30	4. Market Housing' - Could refer to the Council's SHMA which considers market housing need and seeks a mix including smaller 1 and 2 bed housing, rather than the developer lead push for larger accomm. Note that CBC considers the acceptability of the market tenure in the assessment of applications, not just affordable tenures and not just leaving it to 'the market'.	Noted
	CBC Development Management	Community Priority Projects	5. Potential Priority Projects: Items 1 and 2 may run counter to and difficult to justify in light of NPPF sustainable development principles; Item 3 does this include land purchase or is their land in PC control already?; Items 11 and 12 are these facilities available for use by the public?; Item 14 is this not the utility provider responsibility or the developer responsibility as part of any proposals?; Items 15 and 16 Is there an Authority responsible for monitoring and maintaining this, is it the police? Will it actually be monitored and maintained to achieve the purpose you intend?; Item 17 Same comment as item 3; Item 19 Is there a more comprehensive proposal to improve these facilities?; In general, along with costing up the proposals to justify the s106 requests, also link each proposals to a policy and NPPF reference as well as doing your CiL Regs compliance	Noted Item 3 – no Remove item 14 (Anglia Water). LNP supports these aspirational projects

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
	CBC Development Management	Policy EN1	6. Points 1 to 8 – Unclear what it is in the way of actual information and reporting that is needed/requested to address this policy? Will you need the same level of detail for a minor as a major application? For example, are you wanting landscape details and management plans to address item 2? For item 4, are you seeking a character appraisal within a Design & Access Statement or heritage statement for example? For Items 7 and 8 are you seeking a Flood Risk Assessment, SUDS details? Item 6 does not appear relevant, developments need to meet their parking requirements on their site, not provide additional parking for other existing development and uses off site – such a request is also unreasonable	Noted. Remove item 6 (now 8).
	CBC Development Management	Policy EN2	7. "....strong support for reducing the impact of new developments on footpaths, public rights of way, bridleways, new road junctions...." - Additional residents/users and their movements associated with the development will result in a greater impact. The question is, whether or not the area has the capacity to accommodate the increased use or if there is mitigation required, either provided in the development itself or secured as an off-site mitigation by s106 planning agreement OR Grampian condition OR separately e.g. Highways Act agreement	Should be integrated within the estate. Reference to Design Codes within the Policy. EN2.1 and EN2.4 lines added.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
	CBC Development Management	Policy EN2	8. Pt 1 "open village aspects and scenery" - Do you mean the existing village character? Is that just important in a green space policy or are you wishing to have a general character policy? Have you defined what makes Langford a distinct place and therefore, what you are seeking development proposals to address in their access, layout, scale, appearance and landscaping?; Pt 2 Re Agricultural land, surely the implication is that Ag land would be lost to make way for development - are you not therefore seeking to resist the loss of BMV Agricultural land? Pt 5 and 9, should this be an item identified as a project on pp45-46? NB suggestions about identifying and justifying such proposals also apply here. Pt 8 incorporate into early points 4 and 5 for simplicity?	Agricultural land is an important aspect of the Langford landscape, therefore there is resistance to any further loss unless there are demonstrably and significant benefits to the community.
	CBC Development Management	Policy EN3	9. Same as EN1 comment, unclear what is being referred to e.g. what 'best practice' and what actual info and reporting needs to be provided to address this policy? For example, are you requesting that major residential apps have accreditation with the Police 'Secured by Design' program? Is item 3 more a flooding point rather than over-development? In general, there is no coverage of the overdevelopment aspects and what you are seeking e.g. setbacks, min garden depths, density calculations, height limits for example?	Ref. to "Secure by Design". Item 3 flooding and overdevelopment issue. Ref. to Design Codes.
	CBC Development Management	P56	10. Protected areas' - What are the areas are regarded as protected and if you are not defining a limited list of specific land parcels, what is the qualifying criteria for potential site in the future? Is it just the 3 identified? Is this policy therefore seeking to maintain important countryside gaps and open spaces and that you will resist development of these? If so, and if just these 3 key spaces, then simplify the policy accordingly to make it stronger	Noted.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
	CBC Development Management	Policy IF1	11. IF1 Item 1 - Are you not seeking to widen the consideration to include SUDS and the drainage hierarchy? SUDS team could input here. Do you wish to add open space provision as part of schemes to meet its need or contribution towards off-site improvements to mitigate their use by the development? Item 6 "...not by simply stating that <i>"more people, means more sales as well as Council Tax income"</i> , or that <i>"temporary jobs will be created due to construction..."</i> - with the exception of tax revenue, these are legitimate economic benefits of schemes considered in the planning balance. Unless the proposal is for additional retail floorspace or its loss, or is adjacent to it and may result in a land use conflict and be prejudicial to its continued operation for example, there is surely no direct planning implication that needs to be considered on other sites?	Policy modified.
	CBC Development Management	Policy IF2	12. IF2 Cannot <u>not</u> consider a scheme, sustainable development is to be approved without delay per NPPF so the issue is securing the necessary mitigation to make the scheme acceptable in planning terms. This includes education contributions to mitigate the demand from the population associated with a scheme. IF2 Could consider condensing this policy down to stating that education contributions will be sought to mitigate the pop increase attributable to resi schemes. The spending will be in the applicable school catchment area serving Langford. Items 4 and 6 appear vague and beyond the remit of the planning process. Suggest CBC Education team could offer input on an education policy	Noted. Reference made to s106 /CIL spending in the Langford catchment area. Items 4 and 6 removed as suggested.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
	CBC Development Management	Policy IF3	13. IF3 Same comments as for education, you cannot <i>not</i> consider a scheme. At item 1, do you mean secondary healthcare contributions towards hospital A&E servicing the attachment covering Langford? Item 4 is there a pharmacy in the village and if not, is this being sought in association with an existing practice? Is there a risk of seeking a planning contributions 'public money' for a private operator? Suggest the CCG could offer input on a healthcare policy. Reference to care homes etc is more for a housing policy	Contributions to Healthcare in the Parish. Reword 1st paragraph.
	CBC Development Management	Policy IF4	14. IF4 - What are you seeking as actual information to address the requirements of this policy e.g. emails/letterhead/enquiry/application records of the utility provider to demonstrate they have considered the scheme and indicate capacity to accommodate the development and or their separate approval process to be followed. And or a utilise assessment report for major apps? Could condense the policy wording and put a lot of the words into background paras. Broadband item 3 - careful with jargon like 'Superfast', what does that actually mean and will this be the applicable technology for the plan period? Is there a better way to define or phrase what you are seeking?	Policy and preamble updated to reflect the points raised.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
	CBC Development Management	Policy IF5	15. IF5 - Too vague. What are you trying to achieve? For example a policy that protects existing facilities and floorspace? Or a contribution towards their reprovision off-site? What is a 'community foci'? NB be careful of schemes encouraging and promoting new floorspace as this may take away from the investment in and profitability of your existing halls and other venues that the public have access to. CBC Community officer and the parish liaise on the contributions to mitigate the impact of new schemes. Also, the phrasing "encourage, stimulate or contribute" is vague in planning terms. Is the scheme proising additional employment or community floorspace - if that is what you are supportive of then say that. Note that the provision needs to be in the right place and not undermining existing provision. In the case of community floorspace, if you are seeking an off-site contribution to existing facilities you could make explicit reference to this option.	Agreed to amend to make less vague.
	CBC Development Management	Policy IF6	16. IF6 Same comment re the use of phrasing "encourage, stimulate or contribute" and "community foci". Also, repetition with the previous policy. What do you mean by 'spiritual facilities, clubs and societies', is there a risk that you are promoting the interest of a specific group over more wider and general community access. NB per earlier comments, if you are seeking planning contributions towards facilities, they need to be genuinely serving the wider community, you cannot collect contributions to subsidise a private enterprise. Also, could perceive the policy title as discriminatory, simply titling it 'leisure and community assets' covers the others and is perceived as more inclusive. Better to be more generic rather than marginalising and alienating groups and individuals in your community, now and across the plan period. Also avoids falling fowl of separate rights and equalities legislation.	Agreed to explore merging of IF5 and IF6.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
	CBC Development Management	Policy TM1	17. Pt 2 - not sure what "timely" adds to this? Pt 3 Need to consider what is reasonable in cumulative assessment of future development i.e. committed schemes such as allocations or planning approvals secured or appeals allowed. Item 4 Unclear if consideration of noise, light and air pollution is a wider consideration for the operational development or if you are specifically concerned about the contribution made by the traffic being generated by a proposal? if the former then this would be a different policy. If the latter you would need to be more specific about what in planning terms you are seeking, noting that other legislation covers the automotive standards that vehicles must adhere to. Is it down to layout, hours or operation and deliveries for example where planning controls can reasonably limit the effects on existing neighbours. Re last sentence, would the travel plan be agreed with Central Bedfordshire Council, rather than Bedfordshire County Council?	Agreed to remove 'timely'. Central Bedfordshire Council edited. LPC changed to 'village'.
	CBC Development Management	Policy TM2	18. TM2 Item 1 parking oversupply facilitates/perpetuates the reliance on private car use at the expense of uptake of sustainable modes and the climate change agenda. As such, you may want to consider revised wording that seeks parking in line with numerical standards rather than wording implies support for an oversupply. It is appreciated that in smaller settlements and countryside that there is necessarily a greater reliance on private car-based trips. However, this should not override the principles of sustainably locating development in the first instance including the availability of alternatives to the use of the private car. If development i being kept to the within the settlement envelop that it is inherently sustainable therefore, no need for additional parking. Allowing an oversupply and looking at parking standards as a minimum rather than a maximum is not in step with the direction of policy and guidance.	Agreed to reword to be less prescriptive.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
	CBC Development Management	Policy TM2	19. TM2 Item 2 Not relevant if the location(s) are on public highway, a matter that could be considered under separate highways legislation to consider if parking restrictions and a change to the traffic order is reasonable and appropriate. Although narrow roads and parked cars create obstacles that have the effect of slowing vehicles. Whilst not liked by drivers, the beneficial effect is to slow the speed environment. As opposed to wider free flowing roads that then require vertical calming interventions like humps and tables to slow car speeds. Such features are disliked too. narrow roads and informal parking is more visually characteristic of rural settlements also.	Some points to be moved to the preamble as examples from residents.
	CBC Development Management	Policy TM2	20. TM2 Item 3 Is this relevant to planning, how is this enforceable? - consider deleting/amending	Some points to be moved to the preamble as examples from residents.
	CBC Development Management	Policy TM2	21. TM2 Item 4 Same as above - delete/amen. Instead, investigate options to restrict vehicle sizes using the roads - CBC Highways team could offer advice	Some points to be moved to the preamble as examples from residents.

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	CBC Development Management	Policy TM2	22. TM2 Item 6 Seems vague, what is it that you are seeking that is not covered by Manual for Streets for example?	Some points to be moved to the preamble as examples from residents.
	CBC Development Management	Policy TM2	23. TM2 Item 7 Further to comments on item 2, traffic calming is not always needed everywhere. Narrow roads in settlements and the informal parking opps effectively slow the speed environment	Some points to be moved to the preamble as examples from residents.
	CBC Development Management	Policy TM2	24. TM2 Item 8 How will you achieve this, is this achieved by seeking a Travel Plan per policy TM1? Cross reference if so. How do you police and enforce waiting cars at pick-up points? If it is a pick-up point, surely drivers are entitle to use it?	Some points to be moved to the preamble as examples from residents.
	CBC Development Management	Policy TM2	25. TM2 Items 9, 10, 11, 12 - Highways team could offer a view along with input from other authorities and stakeholders. What is a one way system achieving, it is the free flow of traffic which is again giving primacy to car based modes? Or is it freeing up space for more pedestrian infrastructure like wider footpaths?	Some points to be moved to the preamble as examples from residents.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
	CBC Development Management	Policy TM3	26. TM3 Agree with the sentiments of opening sentence and so, questioning if earlier policies are aiding this or perpetuating the use of the private car? Highways might be able to offer further comment on items 1-6	Noted.
	CBC Development Management	Policy TM4	27. TM4 What would you be seeking from development e.g. incentives in a Travel Plan for major apps? Any s106 planning contributions? How does item 4 work, is this in relation to a private taxi company service or a community-based organisation? The former would be an issue if it was giving an advantage to private firm with public money. If the latter, how would that operate, is it feasible? A Travel Plan or other sustainable transport officer in CBC may be able to offer input into proposals	TM4 removed and replaced by aspirational comments.

11	CBC Flood Risk	2.8 Water Management	28. The nature of flood risk: Section 2.8 considers the risk of flooding from the main river (Ivel) running parallel to the village, as well as the environmental and other qualities it brings to the village but does not give equal consideration to the risk from 'other sources'. The NP could make greater reference to the nature of surface water flood risk and the risk of flooding from 'ordinary watercourses' (i.e. the watercourses that do not have flood zone 2/3 mapped by the EA). CBC have multiple records of flooding reported, outside of the river corridor/mapped flood plain. These are associated with surface water from overland flows and exceedance of the urban drainage network. These reports highlight the risk in Langford, and the need for mitigation in these areas. The majority of flooding is recorded along Station Rd, with reports also clustered on the northern and southern ends of the high street (B659). Map 1 to the right shows the extent of surface water risk, demonstrating this affects much of the village, including the sites proposed for development by the NP to the east. 3 major flow overland flow paths for surface water are apparent from the mapping. these flow east to west, following the local topography, towards the main river. The NP would benefit by making, through policy, its position clear on whether development that impacts existing surface water drainage patterns is deemed acceptable, and what mitigation is to be provided to make the site safe while ensuring changes to the existing drainage patterns will not be of detriment to the wider community and environment. There are also a number of watercourses/drains not shown on the OS map, three larger ordinary unnamed watercourses which flow east to west through Langford, they are not covered by the Environment Agency's Flood Zones mapping but will likely present flood risk. As these are not shown on the EAs flood map for planning, it is likely that, unless the NP recognises the risk an opportunity associated with these, development proposals will take these into account. Recommendation – the NP make clearer reference to flood risk from all sources.	We have accepted the need to include greater reference to surface water flooding. We have added much more detail on this threat and have modified Objectives and Policies accordingly. We have included 4 detailed maps into section 2.4 of the Plan from the Environment Agency website to show the risks to Langford. Section 2.4: more maps included.
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Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
	CBC Flood Risk	2.8 Water Management	29. Historic flood risk in Langford: The urban drainage network is known to have exceeded in multiple locations, with many records of flooding reported throughout the village (approx. 35) (see photos on right). In addition to poor highway drainage, there is a significant length of culvert (historic across the village), as well as other sections of culverted watercourses throughout the village. see map 2. The condition of this is unknown and assumed to be poor in places, contributing to exceedance flooding. This is not reference din the NP. The NP could identify that connections into this should be restricted from new development and, in the case of brownfield development, that existing connections are removed, and more sustainable alternatives pursed to dispose of surface water. This would help relieve pressure eon the urban drainage network and contribute to an overall reduction in flood risk. Recommendation – Historic flood risk be used to evidence the need for more sustainable flood and water management through new/re-development.	Remove references to on-line. Change to reference to CBC document. Unable to access records. Noted, policies adapted accordingly. Inserted new Map 6 and Map 7

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
	CBC Flood Risk	2.8 Water Management	30. Urban drainage: The majority of the urban area is thought to drain to the foul sewer, see map 4, as there are no public surface water sewers in the vicinity of the village. NPPF and Local plans restrict future connections to the public foul sewer on the grounds of sustainability and increased flood risk. The NP should echo this, recommending new development does not provide new connections to the public sewer, and for brownfield sites that existing connections are removed, and alternative sustainable solutions used to dispose of surface water run off. Policy t5 refers to the drainage hierarchy (as it is set out in Building regulations Part H) but does not emphasise the need to avoid/reduce connections to the existing public sewers. Given the flood records within the centre of the village, the urban drainage is likely at or near to capacity and connections to this should be avoided where more sustainable methods (discharge to ground/watercourse) are achievable. Recommendation – The NP recognise the existing restrictions on urban drainage and the need for betterment for existing communities, through new/re-development.	Agreed and have strengthened the Plan in this area.
	CBC Flood Risk	Environmental Policies: EN1 – EN4	31. The objectives do not include resilience to flood risk, current and future. Given the nature of flood risk from surface water, ordinary watercourses/main rivers, as well as from urban drainage, this should be priority of the NP. This risk has been realised in multiple areas of the village, as recorded by CBC. however, it is not listed in the objective bullet points/summary. Recommendation – Objectives are reviewed to incorporate stronger stance on flood risk management.	Agreed and have included a new Objective 2 to make a stronger stance on flood risk management.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
	CBC Flood Risk	Policy EN1:	32. Point 7 relates only to fluvial flooding and mapped flood plain extents, as mentioned above, not all watercourses/floodplains have been mapped on the flood map for planning and the area is at significant risk from other sources than main river. This should be made clear and the policy stronger to manage the risk from this and promote betterment of the existing flood risk through new and redevelopment opportunities. The policy could also high light the need to use sustainable drainage methods, including avoidance of connecting to the urban drainage network in favour of more sustainable solutions, to avoid increasing the risk from these systems (already at capacity/poor condition), alternatively if a connection is justified on account of their not being any alternative solutions than the developer should commit to improving the performance of these systems to facilitate the proposed additional flows. Brownfield site should be supported to remove existing connection to the urban drianage network, or in the least, provide betterment of flow rates/volumes/quality of run off into this. Recommendation – EN1 reviewed to incorporate stronger stance on flood risk management.	Agreed and have made improvements as suggested to Policy EN1 and included water course constraints in Section 2.5.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s
	CBC Flood Risk	Policy TM2	33. Policy TM2 promotes traffic calming measures and alterations to the existing road network be pursued by new development, including on Church Street and High Street. Both of these roads are known to flood from exceedance of the urban drainage network. Given the assumed restriction in the capacity of the urban drainage, any works to the road network including traffic calming should consider the impact on flood risk and flood risk management arrangements, such as highway drainage and road side ditches, ensuring the works are complimentary to these and prioritise betterment of water management to the existing arrangements to reduce the risk this poses to the existing community. SUDS and traffic calming should be designed together, to provide multiple benefits for the environment. See examples: https://www.susdrain.org/delivering-suds/using-suds/benefits-of-suds/traffic-calming. This also applies to the areas of proposed new parking. Flood and water management should be a priority when making changes to the road layout and its existing drainage, ensuring performance of this is enhanced while also removing pollutants that could wash into the river through conveyance. Recommendation – Policy TM2 reviewed to integrate infrastructure changes flood risk management.	Agreed and have included the recommendations in Policy TM2
	CBC Flood Risk	TM3	34. Change so that the impermeable areas of pathways, cycleways and footpaths should consider the potential impact on increasing/reducing the existing flood risk posed to the community. Permeable surfaces and retrofit SUD solutions could be integrated into this to enable wider benefits for water management (quality/quantity) and the environment. Recommendation – Policy TM3 reviewed to integrate infrastructure changes flood risk management.	Agreed and have included the recommendations in Policy TM3

	CBC Flood Risk	Planning and Development Policies: PD1 – PD5 - Identified sites (page 29)	35. Risk to identified sites: The potential sites identified on page 23 of the NP; 'Goodsyard (Cambridge Rd), land east of Station Road, and 1a Jubilee Lane, land west of Church Street, land r/o 5-7 Church Street, Land west of Langford Road and Land off Church Street all border existing surface water flow paths or watercourses. The risk of flooding to these sites should be fully assessed and a proposal to manage this (without increasing risk to others) demonstrated for consideration. The proposed sites Goodsyard (Cambridge Rd), Land east of station rd., and 1a Jubilee Lane are at the top of the flow paths and offer opportunity to intercept and store flood flows to reduce the impact of flooding in the lower catchment from surface water. The requirement to manage surface water is not as strong in the NPPF as it is for fluvial, we therefore recommend the NP emphasise surface water management of existing flows be prioritised as a key design principle of these sites, in addition to the use of SUDS to offset the run off generated by the development. The need to provide betterment for the lower catchment could also be made stronger through policy wording in the NP. This is also relevant to objective 6 of Planning and Development Policies: PD1 – PD5. Recommendation – Identified sites consider the nature of flood risk (existing and future) before further commitment is made to delivering these.	The Goodsyard site has already been developed and is now known as Steamer Croft. Agreed and have modified Objective 6 and Planning Policy PD4 to reflect the changes recommended. Added as point 3.g. in Policy PD5
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	CBC Flood Risk	Policy PD4: Residential Design	36. For the reasons set out in this response, this policy could refer to sustainable drainage and flood risk management through design, integrating these within the development to make high quality places which also function to manage water quality and quantity through natural process (SUDS). The area of Langford is generally not suitable for infiltration, however this should not prevent the uptake of SUDS and the use of the management train approach to the design of drainage on new developments, the NP could make this stance clear, as there is a common assumption by developers that no infiltration means SUDS can't be used, this isn't the case as natural processes to manage the quantity and quality of flows can still be applied on all sites.. Given this may be a common challenge to the uptake of SUDS in Langford, given the ground conditions, the NP may want to re-enforce the stance at the local level. Given the nature and history of flooding in the village, (sustainable) drainage solutions to manage the existing and future risk of flooding should be a key design principle. Recommendation – Policy PD4 prioritise sustainable drainage as a key design principle for all new/re-development, to manage the risk of existing and future risk from all sources of flooding on and off site, and to deliver wider benefits for the environment.	Agreed and have modified Planning Policy PD4 to reflect the changes recommended.
12	CBC Planning Policy	Policy EN1	1. Need to clarify either the amount of new housing or floorspace of new development which would be required to undertake this very comprehensive list. A single dwelling could come forward and would be expected to undertake all of the policy requirements. It would not be expected of a single dwelling to provide all of the details in this list.	See previous comments.

	CBC Planning Policy	Policy EN3	2. Not sure about the evidence to suggest that larger scale permeable developments are considered to be less effective in tackling anti-social behaviour than smaller less permeable developments.	Further evidence sought from Beds. Police. Reference to Secure by Design guides within the text.
	CBC Planning Policy	EN4	3. Points 1, 2 and 3 are mainly statements regarding concerns the LNP questionnaire found, not policy requirements. Therefore, they should be in the preamble rather than the policy itself.	Agreed. 1st 2 paragraphs and points 1-3 removed to preamble, leaving 1 paragraph as the policy.
	CBC Planning Policy	IF1	4. It is difficult to apply all the points in this policy to the different types of development. Housing development would relate to the majority of these points. But would community or leisure use? Would community or leisure use really be expected to identify the current health and dental care needs, seeing that this type of development would not increase the number of residents within the village, for example?	Reference to the level of detail required commensurate with the size and type of development.
	CBC Planning Policy	IF2	5. The 6 points in this policy again apply to residential developments of whole dwellings. However, as seen in 'no new development', this could refer to small householder extensions, retail units or even community/ leisure assets. Would they too need to demonstrate the situation/need for school and education facilities? Also this policy doesn't make leeway for development proposals to provide the educational facilities if that is required to make the development acceptable.	Statement for clarity required.

	CBC Planning Policy	IF3	6. This policy restricts development if there is no capacity within current health care facilities. However, it does not consider the possibility for new development to expand existing or provide new healthcare facilities.	Will support the development of health facilities in the village.
	CBC Planning Policy	IF4	7. Point 3 is repeating existing policy in CBC LP, therefore is it necessary?	Noted. Retained as a result our response to the current climate emergency.
	CBC Planning Policy	TM2	8. Is it the requirement of TM2 for new development to adhere to the 12 points within the policy? As it just states that 'Measures will therefore be development and supported that:...'. Who will conduct these measures?	Some points to be moved to the preamble as examples from residents.
	CBC Planning Policy	TM3	9. It isn't specified who will be required to put in place the policy requirements.	Noted
	CBC Planning Policy	TM4	10. Who is going to develop said policies? - 'Policies will be developed and supported that:...'. Who will conduct these measures?	Noted

	CBC Planning Policy	PD4	11. The Car parking requirements within CBC's Design Guide should be used.	Replaced to meet or exceed CBC's Design Guide for Car Parking.
	CBC Planning Policy	PD5	12. Repeats the policy requirements from other policies within the plan.	Noted
13	CBC Ecologist	Environment	13. All good, a really interesting Neighbourhood Plan with lovely photos. I am supportive of their aspirations in terms of retaining and caring for open space associated with the Ivel corridor	Noted.

14	CBC Archaeology	Section 3	14. This section claims to include the historic environment, but there is virtually nothing about the historic environment in it. Therefore, I fail to see how the NP is meeting its first objective to 'Protect and enhance the landscape, its biodiversity and the historic environment of Langford' While there may not be any designated archaeological remains within the NP area, there is a growing body of evidence for non-designated locally and regionally important archaeological sites. Therefore, it is disappointing to see this overlooked.	Noted. We have created a new Background Evidence Appendices B.2 and B.3 to answer these points. We also propose a new Environmental Policy, EN5, entitled “Protecting the Historic Environment of Langford” <u>Objective:</u> To draw the attention of potential developers and residents to the very long and varied history of Langford and its built environment and to ensure the survival of the buildings, sites and locations wherever possible. Applicants are required to demonstrate that they have consulted the entries for Langford in the Historic Environment Record for Bedfordshire and that their development will not adversely impact in any way any of the entries in the Record.
	CBC Archaeology	Policy EN1	15. This policy doesn't include the historic environment and there is no separate policy to safeguard heritage assets. Disappointing.	Noted. See our response to point 14 above.

15	CBC Neighbourhood Involvement	General	16. Would potentially look to shorten the Plan period, 2039 is quite a long time and the Plan will not be relevant without refresh until this time. More suitable to align with emerging Local Plan to 2035. Although there is reference at 1.2 of it being a fluid and flexible document	Agreed
	CBC Neighbourhood Involvement	General	17. Document needs writing with numbered/bulleted paragraphs for ease of reference	This will be explored when the document is reformatted for final submission.
	CBC Neighbourhood Involvement	General	18. Move version table to page 2, behind front cover	Final document is unlikely to contain the version table.
	CBC Neighbourhood Involvement	Contents	19. 1.4: split the two questions with a second question mark after 'Why are we making a Neighbourhood Plan'	Amended

	CBC Neighbourhood Involvement	Glossary	20. SUDS is Sustainable Urban Drainage Systems	Amended
	CBC Neighbourhood Involvement	General	21. Capitalise references to local plan so Local Plan	Amended
	CBC Neighbourhood Involvement	General	22. Add titles to maps/images/tables/figures	These will be added at final production stage.
	CBC Neighbourhood Involvement	1.2 Delivery & Implementation	23. This is often best placed at the back of the document	Noted. Keep at front because we feel it is important.

	CBC Neighbourhood Involvement	1.2 Delivery & Implementation	24. This section is written well and is clear in the plans aims, difficult to influence the emerging Local Plan at this stage though and restrict any large-scale housing in the future. Appreciate Langford has seen a lot of development but a lot of other settlements have too and there will be a balance in looking at future housing allocations/windfall sites comparing constraints, cumulative impact of past development, capacities etc.	Noted
	CBC Neighbourhood Involvement	1.2 Delivery & Implementation	25. Good focus on community spirit and volunteering to achieve aims. Positive to see reference to a review every year	Every two years in line with the review of Parish Council Policies.
	CBC Neighbourhood Involvement	1.3 What is a Neighbourhood Plan?	26. This section reads well, clear and concise. The Context – add reference to these being ‘Basic Conditions’ that have to be met	Amended
	CBC Neighbourhood Involvement	1.4 Why are we making/what is a Neighbourhood Plan?	27. Vision – where does this formally end? After ‘community’?	Amended

	CBC Neighbourhood Involvement	1.4 Why are we making/what is a Neighbourhood Plan?	28. Motivation – this section might be better/clearer in a table listing all approvals, maybe remove the reference/figure for those that are likely to be approved, update if they are approved with a total at the bottom of the table. CBC can assist with data if needed	Agreed
	CBC Neighbourhood Involvement	1.4 Why are we making/what is a Neighbourhood Plan?	29. Motivation – second para, reference to draft CBC Local Plan, the plan is not in draft form anymore, there may still be modifications as is usual in the production of a Local Plan but it would be best referred to as ‘the submission CBC Local Plan’ or ‘emerging CBC Local Plan’	Agreed on emerging CBC Local Plan.
	CBC Neighbourhood Involvement	1.4 Why are we making/what is a Neighbourhood Plan?	30. Motivation – perhaps reference which sites have been allocated and which plan they were allocated in to provide some context to the approvals/recent growth in Langford, also reference to those sites emerging could be re-written as this section will soon be out of date	Agreed. New Maps inserted.
	CBC Neighbourhood Involvement	1.4 Why are we making/what is a Neighbourhood Plan?	31. Motivation – third para, reference to CIL – CBC does not currently have an adopted CIL in place so the reference to not having an approved plan in place and reducing funding from developments is slightly inaccurate. CBC to provide additional text mentioning CIL and the ability for the Neighbourhood Plan to still be able to influence the S106 process by identifying projects and aspirations in Langford for where monies could be directed	Noted. Text requested, but not received.

	CBC Neighbourhood Involvement	1.4 Why are we making/what is a Neighbourhood Plan?	32. Methodology – well written and clear. Could always include your NP objectives here too, Examiners like to see the theme of Vision - Objectives - Policies	Noted
	CBC Neighbourhood Involvement	1.5 National Framework & CBC Emerging Local Plan	33. Change title to Emerging CBC Local Plan	Amended (including further references within the following text).
	CBC Neighbourhood Involvement	1.5 National Framework & CBC Emerging Local Plan	34. Emerging Local Plan – change reference in sub-heading and first para to 'The emerging Central Bedfordshire Local Plan (2015-2035)'	Amended
	CBC Neighbourhood Involvement	1.5 National Framework & CBC Emerging Local Plan	35. Positive reference to consistency with strategic objectives	Noted

	CBC Neighbourhood Involvement	1.5 National Framework & CBC Emerging Local Plan	36. Need additional reference to the policies and objectives of the currently adopted Local Plan covering Langford and north Central Bedfordshire – CBC Core Strategy & CBC Development Management Policies, this conformity should also be referenced throughout the Plan – NPPF/existing LP/emerging LP. Existing and emerging LP policies and aims will be broadly similar	A comprehensive table combining NPPF/emerging CBC LP and NP included within the Basic Conditions Statement.
	CBC Neighbourhood Involvement	1.6 The legal requirements	37. Third para – reference to pre-submission consultation and conclusion early 2019, for clarity refer to this as initial community engagement/consultation. Pre-submission consultation is Reg 14 and is happening late 2019/early 2020	Amended
	CBC Neighbourhood Involvement	1.6 The legal requirements	38. This whole section could be shortened and some parts moved to the opening sections of the Basic Conditions Statement, changes like this would help to make the Plan more concise	Noted and actioned.
	CBC Neighbourhood Involvement	1.7 Public consultations	39. Really good responses to your consultation. Would shorten this section though, most of this should go in the Consultation Statement, reduce it down to a summary of the engagement you have undertaken similar to second para	Noted. Have reviewed.

	CBC Neighbourhood Involvement	1.9 Plan Period, Monitoring & Review	40. This should be section 1.8	Amended
	CBC Neighbourhood Involvement	1.9 Plan Period, Monitoring & Review	41. Align Plan Period to 2035	Amended
	CBC Neighbourhood Involvement	1.9 Plan Period, Monitoring & Review	42. Refer to Langford Parish Council in second para as the Qualifying Body	Amended
	CBC Neighbourhood Involvement	1.9 Plan Period, Monitoring & Review	43. Mention that LPC will be undertaking ongoing monitoring of the policies, this is easier to do as you go rather than looking back over a period of 1 or 2 years. More in-depth review after 2 years definitely a positive though, add reference 'to ensure relevance, to monitor its delivery and to ensure evidence bases are still up-to-date'.	Agreed to amend. Insure monitoring and delivery.

	CBC Neighbourhood Involvement	2 Characteristics of the Parish of Langford	44. 2.2 – Change title of section to ‘History & Local Features’	Amended
	CBC Neighbourhood Involvement	2 Characteristics of the Parish of Langford	45. 2.3 – Change title of section to ‘Demographics’	Amended
	CBC Neighbourhood Involvement	2 Characteristics of the Parish of Langford	46. 2.4 – Change title of section to ‘Constraints’	Amended
	CBC Neighbourhood Involvement	2 Characteristics of the Parish of Langford	47. 2.4 – this section needs a little more explanation and expanding, explain the purpose of a settlement envelope, expand on the development pressures	Moved to Background Evidence Appendices.
	CBC Neighbourhood Involvement	2 Characteristics of the Parish of Langford	48. 2.4 – Would benefit from one constraints map, rather than individual maps. CBC can further assist with mapping	Agreed. Requested from CBC and included.

	CBC Neighbourhood Involvement	2 Characteristics of the Parish of Langford	49. 2.5 – Change title of section to ‘Green Spaces’	Amended
	CBC Neighbourhood Involvement	2 Characteristics of the Parish of Langford	50. 2.5 – the series of maps may need refining, not sure of the need for repeating the Residential Development map	Noted.
	CBC Neighbourhood Involvement	2 Characteristics of the Parish of Langford	51. 2.6 – Change title of section to ‘Housing ‘Need’, would be useful to summarise what the findings of the Housing Needs Survey are in this section. Potential to add in information regarding the wider housing need in Central Bedfordshire and Langford’s role in this	Noted. Unable to include this until Local CBC Plan approved.
	CBC Neighbourhood Involvement	2 Characteristics of the Parish of Langford	52. 2.7 – This section could be shortened, make images smaller, move graphs and list of businesses to an appendix or a separate paper to support the Plan, summarise feedback from businesses here	Noted.
	CBC Neighbourhood Involvement	2 Characteristics of the Parish of Langford	53. 2.8 – May be difficult to deliver the requirement for increased transfer from Ruthamford North by a specific time through a Neighbourhood Plan	It is important that the reference to the need for this transfer remains in place so that the availability of potable water for new developments from 2025 is not forgotten.

	CBC Neighbourhood Involvement	2 Characteristic s of the Parish of Langford	54. 2.9 – Detailed comments on connectivity, requirements in there that are not policies and have the potential to be brushed over, potential to shorten this part too or create a separate report on connectivity	Noted.
	CBC Neighbourhood Involvement	2 Characteristic s of the Parish of Langford	55. 2.11 – good content on the suitability of identified projects towards Section 106 and that these need to be scoped, defined and costed in detail	Noted. Aspirational, but costed elsewhere.
	CBC Neighbourhood Involvement	Policies	56. Other colleagues will provide more detailed responses on policies. Some general comments: Potential that some are too long and detailed, with overly restrictive requirements, can take some text out and use as a preamble to policies, whole section needs to be shorter/more concise	Some sections modified.
	CBC Neighbourhood Involvement	Policies	57. Consider rewording some policies with more positive language. For example, EN1 could be written like this: 'Proposals for new housing, employment, retail, community or leisure use, or for any other proposal that raises issues with sustainable development, will be supported where they can demonstrate.' Even then, the reference to sustainable development is not needed as this is a given with the planning system, any proposal will be judged around the NPFF where sustainable development is at the heart	Noted and actioned where appropriate.

	CBC Neighbourhood Involvement	Policy PD1	58. PT1 - No need to say that the LNP is allocating the sites in the Local Plan as it is the Local Plan that is allocating PT2 - Why a baseline of 2016? What are the housing targets for Langford? Is this what was identified as part of the Housing Needs Survey? Or from Langford's position in the CBC Settlement Hierarchy? PT3 - What is the housing obligation for Langford? This sentence should also not be part of a policy PT4 - Again also not directly policy and is repeating national policy/procedure	Pt1 Amended. Between 2001 (Census) and 2015, the village housing stock grew linearly at under 7%/annum. From 2016 onwards, the housing stock has grown in excess of 26%/annum. 2016 has consequently been taken as a datum point of significance. Preamble includes a note on housing obligation which is determined by the allocations made within the emerging CBC Local Plan. Noted
	CBC Neighbourhood Involvement	Policy PD2	59. Call this policy 'Housing Need'. 1. Move first para to the preamble, start with 'The Housing Needs...'. If this HNS gave you a figure of 12 affordable homes and 15 market homes then start the policy with this/include in the current para 2. Move current para 3 to end of the policy after sections 2 & 3 2. This section is fine 3. This is OK too, what do you mean by 'meeting a reasonable proportion of the housing requirement need'?	Accept revisions. Noted. Updated.
	CBC Neighbourhood Involvement	Policy PD3	60. 1. Why a limit of 10 dwellings? Reword to 'Proposals will be supported...'. If all of this policy requirement justified? 1 & 2. Change reference to a building envelope/village ribbon envelope to the Settlement Envelope	Value derived from resident views (87%) - reinforced within the text. Amended

	CBC Neighbourhood Involvement	Policy PD4	61. Paras 1 and 2 need to be re-written/moved to preamble, or link in with/refer to the design evidence from AECOM. Again wording below needs revising, rather than 'proposals must accurately demonstrate...' which is ambiguous, what is defined as accurately demonstrated? Developers will also cover a lot of these/be required to consider requirements through a Design & Access Statement. Where is the evidence for these RD requirements?	Move 1st two paragraphs to preamble. 3rd paragraph modified.
	CBC Neighbourhood Involvement	Policy PD5	62. 1. What is significant community benefit and how is this measured? There is no Green Belt near Langford, do you mean greenfield land? Remove reference to inset from GB and in general Green Belt (2a, 3a, 3b). There are several policies within one here, look to remove unnecessary text i.e. the consultation results and housing mix (move out of policy) and separate	Examples given in the 2nd sentence. Modified as suggested. Policy structure to remain so that it is clear as to where the information has come from, for the user.
	CBC Neighbourhood Involvement	Policy PD5	63. 3. This should be reworded - Proposals that lead to the loss of a viable business use, the loss of community facilities, the loss of areas of Local Green Space, as designated by this Plan, or the net loss of biodiversity, will not be supported. 4. This could be a separate policy on Housing Mix, remove and reword 5. This will already be covered in Highways Design Guidance, remove 6. This is already covered in the CBC Local Plan	Agree to reword (positively).
	CBC Neighbourhood Involvement	7 Policy Map	64. This should be a map, not a table. CBC can further assist with mapping and provide you with a Policy Map.	Request from CBC – not yet received.

	CBC Neighbourhood Involvement	7 Policy Map	65. The existing table should be good, should include 2 additional columns - which NPPF requirements the Neighbourhood Plan policies are meeting and which policies in the existing Local Plan for north Central Bedfordshire (Core Strategy 2009). There is already reference to the Local Plan but this is the emerging plan and whilst useful to include, as it is not adopted yet you need to refer to the existing Local Plan. This is also what your Basic Conditions Statement contains so it might be best in there	Agreed. Taken out and placed into Conditions Statement.
16	CBC Environmental Services	General	66. Thank you for requesting our comments on the Langford Neighbourhood Plan. From an Environmental Services aspect, we would look for the following to be included within any new housing and retail developments: - The development to have placement of litter bins around any retail areas - The development and any amenity areas to have placement of dog waste and litter bins - An area for bring banks to be sited for use by the local residents We would also need to be: - consulted in regards to street cleansing for any new retail areas to be developed - consulted on the waste strategy in regards refuse and recycling collections eg. storage, capacity and access for the refuse crew/vehicle - informed of the extent of any additional grounds maintenance to be adopted and maintained by CBC	Noted.. Noted.
18	CBC Landscape	GI Aspiration Plan	67. I thought this very interesting - the public identified a high number of important views east of the railway line - where there are reciprocal views across the rising agricultural landscape, but no actual views within the river corridor or Langford Meadows.	Images acquired. Moved to Background Evidence Appendices.

	CBC Landscape	Landscape Map	68. I would like NP/GI Landscape Maps and supporting text to include the landscape character areas - they could form an underlay to the map given- at least the boundaries could be shown. The LCA does identify key sensitivities - the NP is a means of having these endorsed by the local community. This has happened - the community emphasise the importance of the agricultural setting and the need to safeguard the long distance views.	Noted. We have created a new Section 2.2 to reflect the Landscape Character Assessments for Langford and have modified Sections 3 and 6 and Policy EN1 to reflect the importance of the LCA's.
	CBC Landscape		69. re the LCA - Langford is in the main within the Upper level LCA Area 4C- where the landscape strategy is to enhance and create degraded or lost features. Comments made in the NP support this broad strategy, so are welcomed.	Noted. See 68 above.
	CBC Landscape		70. The setting of Langford is strongly influenced by the character area to the east - area 5G ,the Dunton Clay Vale, a finger of more elevated land forms the horizon to the east of the village. Part of the village lies in the Lower level area 4B - although this is a relatively arbitrary division, it does highlight the village has a more complex landscape character than might be envisaged.	Noted. See 68 above.
	CBC Landscape		71. The Langford Triangle is a unique feature - I cannot think of any other village with such a distinctive enclosed landscape. I fully support the NP desire to protect this from further incremental loss.	Noted. Raised in Questionnaire feedback.

	CBC Landscape		72. Overall - I thought the environmental policies were good. There is scope to strengthen policies to protect special/ landmark trees - or veteran trees. It would help if key trees were mapped, which could be a further layer on the Landscape Map eg trees with TPOs. However - it is probably best to refer to other special trees in the supporting text eg riverside willows or key street trees, to avoid the dangers of listing.	Request from CBC and included.
	CBC Landscape		73. The NP is well illustrated - this really helps convey the landscape features.	Noted.
19	Intelligent Plans and Examinations Health Check	Page 3	1. A glossary can be useful however some of the acronyms identified are not consistently used within the following document, eg the Central Bedfordshire Emerging Local Plan has a variety of abbreviations used. The document should be checked for consistency.	Agreed - needs revised.
		Page 5; Section 1.1	2. States that it is the policies of the LNP against which planning applications should be assessed. Strictly speaking, once made the LNP will form part of the Development Plan as a whole. S38(6) of the Compulsory Purchase Act 2004 states that: "where in making any determination under the planning Acts, regard is to be had to the Development Plan, the determination shall be made in accordance with the Plan unless material considerations indicate otherwise". This is different to the LNP statement and an amendment is therefore recommended for accuracy.	Agreed and revised.

		Page 6; paragraph 4.	3. The 2 nd sentence is incorrect in that the CBC Local Plan would not be bound by the LNP. This should be deleted or amended in liaison with CBC.	Deleted.
		Page 9	4. The first motivation for the LNP references a need to counteract speculative development before the emerging Local Plan is adopted. The LNP does not necessarily achieve this albeit it does indeed provide a tool for managing proposals. Perhaps the word 'counteract' should be omitted. Is the 3 rd paragraph of page 9 necessary? CIL is known as the Community Infrastructure Levy rather than 'Construction'.	Amended. Amended.
		Page 10	5. The reference to the National Framework would be better phrased as the National Planning Policy Framework and paragraph 1 (and elsewhere) should be updated to reflect the 2019 version which refers to 3 overarching objectives rather than 3 dimensions (see paragraph 8). It would be helpful, and to ensure that a Basic Condition is addressed, to include reference to the extant 2009 Core Strategy and Development Management Policies DPD and its strategic policies, notwithstanding the emerging Local Plan. The Basic Conditions Statement should detail how the LNP has considered the strategic policies of the Development Plan and could be usefully cross referenced in an amendment to this section of the LNP.	Amended. Noted.
		Page 11; Section 1.6	6. Needs updating and sense checking to reflect the current position with the LNP. As written, the 3 rd paragraph needs updating to make sense. The map of the neighbourhood area should be referenced in the text of the page, eg Map 1 on page 18.	Revised.

		Page 13	7. The public engagement process is important and a cross reference to the details of the Consultation Statement (when written) would be prudent. This should detail the specific engagement activities (how, who, when etc) together with an explanation of how this has shaped the content of the LNP.	Agreed and amended.
		Section 2	8. Sets out some factual information concerning the Parish. It would be prudent to review this information with a view to summarising and explaining how the background context informs the objectives of the LNP through to 2039. Some additional narrative commentary may be useful. The map on page 22 is titled “Physical boundary constraints” but actually indicates the settlement boundary – is this intended and clear? Does the purpose of the map on page 23 need explaining (or the map omitting)? The bullet list on page 24 seems disconnected from the maps; is this the list of physical constraints? It would be prudent to review the content, layout and purpose of Section 2.	Moved to Background Evidence Appendices. Ne constraints map included.
		Page 30	9. The NPPF provides a definition for ‘affordable housing’. This should be referenced by the LNP in section 2.6 to avoid the suggestion that the other forms of affordable housing contained in national policy do not apply within Langford Parish.	Agreed. Full definition from the NPPF (2019) included.
		Page 31	10. The 1 st paragraph of section 2.7 quotes from a now superseded version of the NPPF. This should be updated (see paragraphs 80 – 84 ⁱ).	Updated.

		Water Management	11. The LNP approach towards water management should be verified with relevant water utility providers and the Environment Agency/Natural England. This would also be addressed to a degree within any SEA/HRA when complete. It is generally unnecessary (and repetitive) to restate the content of other development plan documents (as they are considered as a whole), therefore there is scope to revise pages 36/37 to be more succinct on the implications for the LNP and thereby provide a focus for the relevant policies intended to apply at the local level.	Natural England and CBC also confirm no SEA/HRA required.
		Page 39	12. Whilst recognising that local concerns exist in relation to the River Ivel, it may be prudent to ensure that rather than expressing the need to “maintain pressure on the EA” to maintain the river this is expressed positively as seeking to maintain an active dialogue. As noted above, liaison with the Environment Agency (and Natural England) before submission of the LNP to CBC would be helpful in ensuring the Plan is drafted in a manner that will mitigate the risk of statutory objection to the LNP.	Agreed to maintain active contact with NE.
		Page 40	13. Refers to water efficiency and it is unnecessary to quote the detail of the Building Regulations, which apply in any event.	Agreed. Recommend removal of “Water Efficiency” section on page 40 in total. Detail moved to Background Evidence Appendices.
		Page 45	14. Consultation/community engagement evidence to support section 2.10 should be included.	Moved to Consultation Statement.

		Page 46	15. The purpose of Section 2.11 within the LNP is rather unclear. There is scope to hone and refine this section to stipulate that where justified S106 contributions to necessary community projects will be sought. The operation of S106 obligations is covered by NPPF paragraphs 54-57 and should be noted/potentially referencedⁱⁱⁱ.	Updated and moved to Background Evidence Appendices.
		Page 48	16. The objectives for Policies EN1-EN4 are set out in a bullet list but it would be helpful to explain how these objectives have come to be selected for the LNP. The 2nd bullet should be amended in liaison with the Environment Agency to ensure the correct form of words. The Water Framework Directive establishes a legal framework applicable to rivers albeit it does not represent a 'status' of itself. This bullet may be better phrased along the following lines: "To facilitate the application of the Water Framework Directive".	Accepted. Suggested intro to the Objectives before EN1 – EN4: "Langford's boundaries to the east & west are primarily rural, whilst those to the south and north are mainly mixed farmland and small areas of woodland, which have been reduced in size by housing. The River Ivel, running along the western boundary of the village, is a major leisure and visual focus for residents. These objectives have been set to protect and promote the environment in and around the village, a clear choice from resident surveys."

		Page 50	17. The first criterion of Policy EN1 would be more succinctly and clearly stated as “... and how this will improve Green Space Coverage”. The 2nd bullet should use the word ‘complemented’ not complimented (and criterion 4). Criterion 4 uses the word ‘celebrates’ which is rather ambiguous and may be better replaced by ‘supports’. The detail of Criterion 5 would be more suitably placed in the supporting justification. Is Criterion 6 justified and necessary in the context of the policy which is focussed upon ‘green infrastructure’ not parking for schools etc? Criterion 7 is unnecessary as specific flood risk assessments will be justified on a case by case basis and its general means of implementation is unclear.	Agreed Agreed Agreed Agreed Noted Agreed. Covered elsewhere. Remove Criterion 7
		Page 52	18. An explanation for how the data has been calculated should be provided.	Revised.
		Page 54	19. The first two paragraphs of Policy EN2 could reasonably be moved into the justification to aid the clarity and focus of the policy. It is not feasible for all development schemes to be expected to deliver all of the 9 criteria listed (eg small scale house extensions) and the 3rd paragraph could consequently commence the policy and state: “Development proposals will be supported where, as applicable, it is demonstrated that: ...”.	Agreed.

		Page 56	20. As above, the first paragraph of Policy EN3 is more suited to the justification for the policy which instead, as a suggestion, could begin: “Development proposals will be supported where it is demonstrated: 1) consideration has been given to best practice in development design to assist combating crime and anti-social behaviour (including litter and dog fouling); 2) flood risk and water management have been addressed adequately.	Agreed. Recommend we change EN3 as to be as follows, with a small addition (highlighted): Development proposals will be supported where it is demonstrated: 1) consideration has been given to best practice in development design to assist combating crime and anti-social behaviour (including litter and dog fouling); 2) flood risk and water supply & management have been addressed adequately.
		Page 56/57	21. The justification for Policy EN4 is rather limited and should be expanded by explaining where the protected areas are (with a map), how they have been identified and why the 3 areas of concern have been selected. Any landowners affected should be notified and specifically consulted. Policy EN4 itself is not precise and there is scope for relocating the first two paragraphs of the policy into the supporting justification, leaving the 3rd paragraph to be amended in order to clearly state what is proposed; perhaps something along the following lines: “Development proposals should be designed to complement the character of the village and ensure that the inner triangle and length of the village are not adversely affected”.	Agreed and amended.

		Page 59; Policy IF1	22. Relates to infrastructure provision. As acknowledged within the LNP (page 59), liaison and agreement with CBC on the elements within the policy would be prudent. As drafted, Policy IF1 would benefit from clarification of its requirements so that decision takers, developers and interested individuals can be assured of its intentions. For example, does it apply to all development or that which is 'major'? Criterion 1 requires the active consideration of rainwater harvesting; what does this mean in practice? Can this be explained in the justification? Criterion 2 would also benefit from clarity as to what is meant by identifying the current provision of education and training provided by local schools, with respect to the current needs and future development of the village. How would this be secured? It would currently appear onerous and unjustified and should be amended/deleted. Similarly, the requirement to identify current health and dental care needs of the community and a proposal's impact on health services is very broad and, arguably, unjustified. Criterion 4, which requires a positive impact, is not currently justified by the evidence which does not differentiate why a neutral effect may not be acceptable. Criterion 6 requires consideration of retail effects and the economic future of the village but this requirement is unclear in its relationship to all development proposals cited in the first sentence of the policy (eg leisure/community uses). Policy IF1 should be redrafted.	Re; the comment on Policy IF1, Criterion 1: As per the Anglian Water consultation (see below), I suggest we modify IF1, point 1 as follows: Actively and demonstrably consider the use of water re-use measures e.g. rainwater and surface water harvesting and grey water recycling for non-potable use. This is attracting increasing attention due to climatic changes and reduced rainfall, especially in the CBC area. CBC is monitoring the progress of a trial installation in Cambridge (ref. CBC Water Cycle Study) Re; Comments on Criteria 2,4 & 6 and IF1 redraft: For others to do
		Policy IF2	23. Relates to school and education facilities. Criteria 1-3 are reasonable and appropriate. Criteria 4-6 are less clear in their justification and implementation (eg what would be required in relation to robust processes for student progress and attainment etc?). It is recommended that liaison and agreement be reached with the local education authority on an appropriate policy proposal, with supporting evidence and clear justification.	Items 4 and 6 removed (item 5 retained)
		Page 63; Policy IF3	24. Is negatively phrased and could be more positively worded along the following lines: "Applications for new developments with an associated increase in resident population should demonstrate adequate capacity in local health care provision ...". Consultation on the LNP with any joint health commissioning body would be prudent to agree the most suitable wording.	Agreed to reword.

		Page 65	25. The justification for Policy IF4 (1) is insufficient. Further liaison with CBC and Anglian Water should be undertaken to agree an appropriate form of words which may be along the following lines: "Major development proposals should demonstrate adequate access to potable water". The issue of waste water is invariably resolved between utility bodies, CBC and developers and further liaison to agree an appropriate policy stance is advised. Criterion 3 is feasibly unnecessary in light of building regulations and intended CBC policy. Criterion 5 is not supported by the evidence (which indicates adequate supply). Criterion 6 is covered by separate regulation and is not appropriate in planning policy. Criterion 7 is aspirational but may only be justified in certain forms of development (eg residential/business).	See the response below to the Anglian Water Consultation and our changes to Policy IF4.
		Page 66	26. The final sentence of Policy IF5 is unclear in its meaning and implementation.	Agreed. Updated.
		Page 70	27. It is unclear what Policy TM1 (2) specifically requires and how it would be implemented. Can further explanation/justification be given? Is criterion 4 directly related to the first sentence of the policy which refers to sustainable transport? Could this be explained in the justification further or amended?	Agreed. Updated.
		Policy TM2	28. Contains no specific requirements and is not planning policy. The phrase "measures will therefore development and supported that: ..." is unclear (when, who, how etc). The policy should therefore be removed or amended.	Some points to be moved Background Evidence Appendices as examples from residents.

		Page 75	29. As above, the phrase “Policies will be developed and supported that: ...” does not in itself represent a planning policy and should be removed or amended. It is feasible that the policy could say something like: “Development proposals will be supported in principle where the following matters are included: ...” (and then amend the numbered list accordingly, but each item would require evidential support. Requiring direct financial support in planning policy is unacceptable).	Agreed to amend.
		Page 77	30. As drafted, Policy TM4 is not a land use policy and, whilst well intended, should be deleted.	Agreed.

		Page 82	31. The purpose and intention of the information within Policy PD1 (page 82) for the Plan period of the LNP is unclear as it appears to identify housing sites either allocated elsewhere or already with planning permission. The reference to 'quotas' within the policy is also unjustified and should be removed (as they are not quotas per se). The continuation of Policy PD1 on page 83 identifies an allocation of 137 homes, albeit there appears to be a planning permission for 150. The LNP should be clear on this point and ensure the site is identified clearly on a supporting map. Criterion 2 has an erroneous date of 2016. Criterion 3 should be agreed with CBC. Criterion 4 should refer to "... within this LNP <i>and other development plan policies</i> providing there is no ...". It is recommended that Policy PD1 is discussed, amended and agreed with CBC. The relationship between the LNP and the strategic policies of the extant Development Plan on the issue of housing should be clarified, potentially by additions to the justification for the policies.	Policy modified.
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		Page 84; Policy PD2	32. Provides a definition of ‘affordable homes’. However, national policy provides a broader definition of the term which should be clearly stated (by cross reference to the NPPF glossary for example) within the LNP. The justification for Criterion 2 is unclear (24 households with a local connection but only 12 units to be provided?). Criterion 4 is unclear – what is meant by market housing and the provision of 15 units? This requires amendment, feasibly with further cross referencing to Appendix E, to achieve clarity. There is no Criterion 3.	Updated in Background Evidence Appendices B.7. Ref. in preamble. Following recommendations from the survey. Ref. in Background Evidence Appendices. Last sentence removed for clarity. Ref. to Background Evidence Appendices. Amended
		Page 86/87/88/89	33. National government has recently issued its National Design Guidelinesⁱⁱⁱ which should be referred to within the supporting justification to Policy PD4 and the policy itself. The justification for the parking standards is unclear and should be discussed and agreed with CBC.	Agreed to reference. Agreed to amend. See previous responses.
		Page 91; Policy PD5	34. Criterion 3 should be agreed with CBC. Criterion 6 should be deleted as it is a prescriptive figure not supported adequately by evidence. Perhaps reference should be made to density levels that reflect and complement the character of the village?	Noted. Ref. to village character from the Design Guide
		Page 92; Section 7	35. Refers to the Policies Map with a table. The relationship between this table and any implications for the Policies Map is unclear and should be explained.	Moved to Basic Conditions Statement

20	Anglian Water	Page 38	1. Reference is made to blocked sewers and smells emanating from existing pumping stations. Where blockages occur, we have a responsibility to ensure that these are cleared so we can continue to serve our customers. We actively work with our customers to prevent items entering the sewer network as the majority of blockages are preventable. Further details of our Keep It Clear Campaign are available to view on our website: https://www.anglianwater.co.uk/environment/how-you-can-help/keep-sewer-pipes-clear.aspx Where issues occur within the sewer network we would encourage customers to report them to Anglian Water so that we can investigate and take appropriate action. The telephone number for reporting sewer flooding is 03457 145 145.	Noted.
		Policy IF1: (Page 58)	2. <u>Point 1</u> – Anglian Water is actively promoting increased water efficiency and water re-use as part of new residential developments as part of our Green Water Programme (https://www.anglianwater.co.uk/developers/development-services/green-water/). Reference is made to rainwater harvesting but not surface water harvesting (where surface water is captured in a pond or tank for re-use) in the Policy EN1 and grey water recycling as referenced in Policy IF4. It is therefore proposed that Policy EN1 is amended as follows: ‘Actively consider the use of water re-use measures (e.g. rainwater and surface water harvesting and grey water recycling for non-potable use.	It should be Policy IF1 NOT EN1, which contains no references to these issues. We suggest we modify IF1, point 1 as follows: Actively and demonstrably consider the use of water re-use measures e.g. rainwater and surface water harvesting and grey water recycling for non-potable use. This is attracting increasing attention due to climatic changes and reduced rainfall, especially in the CBC area. CBC is monitoring the progress of a trial installation in Cambridge (ref. CBC Water Cycle Study)

		Policy IF4: (page 64)	3. <u>Point 1</u> – reference is made to major development proposals demonstrating that they have access to potable water. Water resources are managed by Anglian Water on a larger scale than individual development proposals. It is therefore suggested that Policy IF1 is amended to refer potable water supply required to serve the development.	It is a matter of record that on the 2019 Outline Planning Application for 1500 homes east of Biggleswade (CB/18/02458/OUT), Anglian Water made NO comments whatsoever on the availability of potable water to serve this large development. This lack of comment was remarked upon by members of CBC Development Management Committee at the meeting which considered this application. We therefore suggest we do not modify IF4, point 1
		Policy IF4	4. <u>Point 2</u> - Anglian Water would comment on the available capacity at the receiving Water Recycling Centre to receive additional foul flows as part of the planning application process. The Environment Agency as our environmental regulator are responsible for ensuring compliance with the environmental permits issued for WRCs.	Noted
		Policy IF4	5. <u>Point 3</u> - reference is made to policy CC1 of the emerging Central Bedfordshire Local Plan which includes the optional water efficiency standard and is supported.	Noted
		Policy IF4	6. <u>Point 4</u> - Anglian Water supports the reference made for new development proposals to include grey water recycling being considered favourably. We are actively promoting the inclusion of water re-use measures including grey water recycling, in residential development as part of our Green Water Programme. (https://www.anglianwater.co.uk/developers/development-services/green-water/).	Noted

		Policy IF4	7. It is therefore proposed that Policy IF4 be amended as follows: a) ‘1. Given that Anglian Water have stated that a new transfer route from their Ruthamford North zone to Ruthamford South is required by 2025 to ensure the continuing availability of potable water, major development proposals should demonstrate adequate access to potable water supply to serve the development. b) Anglian Water have indicated that Clifton WWTW cannot currently handle significant increases in waste inputs has limited capacity for additional growth and will be non-compliant due to growth by 2030. They have yet to confirm the destination of Langford sewage and available future capacity at local treatment works. Applicants should ensure and confirm that capacity and compliance is in place for all new developments.’ c) 3. New development applications that include plans for water re-use measures including grey water recycling, will in this respect be considered favourably.’	Re a): In view of our Comment about Point 1 above re. the lack of Anglian Water comment on a 1500 home development, we suggest that IF4 point 1 be amended as follows with this suggested modification: Given that Anglian Water have stated that a new transfer route from their Ruthamford North zone to Ruthamford South is required by 2025 to ensure the continuing availability of potable water, major development proposals should demonstrate, by the inclusion of Anglian Water confirmation, adequate potable water supply to serve the development. Re b) Noted. we suggest that IF4 Point 2 be amended to read: Anglian Water have indicated that Clifton WWTW has limited capacity for additional growth. Applicants should ensure and confirm that capacity is in place for all new developments. Re c) Accepted. IF4 Point 4 should read: New development applications that include plans for water re-use measures, including grey water recycling, will in this respect be considered favourably.
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		Appendix F	8. Reference is made to a design specification for water efficiency and grey water recycling. It would be helpful to set out the source of the information provided for water efficiency and grey water recycling as this is not stated and how the water efficiency specification relates to the requirements of the emerging Central Bedfordshire Local Plan. Consideration should be given to referencing water reuse more generally in Appendix F with rainwater harvesting/greywater recycling used as examples. The use of grey water recycling is not limited to multi occupancy properties as there can be water reuse options applicable for different dwelling types (and for both individual properties and community scale systems). The benefits which are identified only mention greywater systems but are also relevant for rainwater harvesting (e.g. reducing use of potable mains water, and reducing impact on downstream drainage/surface water networks). This also the case for the uses stated (toilets, irrigation). It is therefore suggested that the text be amended to make this clear.	Noted and updated in Background Evidence Appendices.
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21	Historic England	Page 47	1. At present, we are concerned that Langford's neighbourhood plan does not contain sufficient information in order to meet its own objectives as stated on page 47, and does not reflect a positive strategy as required by national policy. While we are pleased to note that the conservation of the historic environment is a top objective for the neighbourhood plan, more detailed information on what this means, what the historic environment of Langford specifically comprises, and specific policy provisions that set out to conserve or enhance its significance is needed. We note that the phrase 'heritage asset' appears only twice, while none of the environmental policies deal specifically with the historic environment. There is no mention of listed buildings, of which Langford contains four, including the Church of St Andrew that, at Grade I, is of very high significance.	New Background Evidence Appendix G - Landscape Character Assessment and Appendix H - Historic Environment Record created. Background Evidence Appendices B.2 text expanded. Now included in Policy EN1. Objective: To draw the attention of potential developers and residents to the very long and varied history of Langford and its built environment and to ensure the survival of the buildings, sites and locations wherever possible. Applicants are required to demonstrate that they have consulted the entries for Langford in the Historic Environment Record for Bedfordshire and that their development will not adversely impact in any way any of the entries in the Record.
		Historic Environment	2. The neighbourhood plan is an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the positive elements, and address any areas that negatively affect that character and appearance. An historic environment section of your plan could include policies to achieve this and, if your Conservation Area does not have an up to date appraisal, these policies could be underpinned by a local character study or historic area assessment. This could be included as an appendix to your plan.	Langford does not have a Conservation Area so we presume no appraisal is necessary. See Point 1 above

		Community assets	3. It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.	Noted. Email sent to Rev'd Speller 04.10.20 re St. Andrews asking for his comments, if any, on safeguarding the church.
		Community assets	4. Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character. Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan.	New Background Evidence Appendix Appendix H - Historic Environment Record created. Email circulated with Historic Environment Record 05.10.20
		Community assets	5. The plan could also include consideration of any Grade II listed buildings or locally-designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement.	The Grade II listed buildings in the village (3 buildings with 4 separate houses in them) are privately owned and are therefore beyond the responsibility of the parish or local council.

		Historic Environment	6. The neighbourhood plan is an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the positive elements, and address any areas that negatively affect that character and appearance. An historic environment section of your plan could include policies to achieve this and, if your Conservation Area does not have an up to date appraisal, these policies could be underpinned by a local character study or historic area assessment. This could be included as an appendix to your plan	Noted See point 2 above
		Planning	7. The NPPF (paragraphs 124 - 127) emphasises the importance placed by the government on good design, and this section sets out that planning (including Neighbourhood Plans) should, amongst other things, be based on clear objectives and a robust evidence base that shows an understanding and evaluation of an area, in this case the Parish of Langford. The policies of neighbourhood plans should also ensure that developments in the area establish a strong sense of place, and respond to local character and history by reflecting the local identity of the place - for instance through the use of appropriate materials, and attractive design.	Noted The Plan already meets the criteria requested.

		Policies TM1-4	8. We note the inclusion of Transport policies TM1-4, and welcome the intention to minimise impacts on heritage assets. We would recommend that the plan include requirements that any new development is designed in accordance with Manual for Streets and Manual for Streets 2, which is the government's best practice for highway infrastructure design. Hamilton Baillie Associates "Toolkit for Traffic in Villages" is also a very useful document to review in this context, and we would also suggest reference to Historic England's Streets for All advice, which can be found on our website (https://historicengland.org.uk/images-books/publications/streets-for-all/). Amongst other things, both Manual for Streets and Streets for All provide useful advice on minimising the visual impact of highways infrastructure in historic areas - for example, minimising the use of bright double yellow lines, and reducing street clutter.	Noted Policy PD4 contains the following: Creating well defined streets and spaces <i>Buildings should be designed and positioned with landscaping, to define and enhance streets and spaces. Buildings should be designed to enable the safe and effective turning at street corners.</i> This should be amended to: Buildings should be designed and positioned with landscaping, to define and enhance streets and spaces. Any new developments should be designed in accordance with the Government documents for best practice "Manual for Streets" & Manual for Streets 2". Buildings should be designed to enable the safe and effective turning at street corners.
		Green spaces	9. Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces, as encouraged by national planning policy. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them, or aimed at managing development around them.	Noted & already included

		Community assets	10. You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved.	The 2 Assets of Community Value in Langford are The Plough Public House and The Wrestlers Public House, the latter now being the Spice Lounge, an Indian Restaurant which is licensed and which offers both dine-in and takeaway meals. As of September 2020, some of the extensive rear garden of The Plough is being developed by a group of village residents as a Community Garden. We understand the group are now developing their plans including seeking funding to develop this new community asset.
		Use of CIL	11. Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan.	We understand that CBC has now changed its stance on CIL and intends to retain s106 as its method of obtaining funding from developers. The confidential nature of the s106 process effectively prevents the community from participating in the acquisition and usage of funds arising from in-village developments.
		Glossary	12. We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.	Noted.

22	National Grid		1. Proposed development sites crossed by or in close proximity to National Grid assets An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area	Noted Comments on micro-outages in Langford required from National Grid. Ref. to usage of UPS. Now included.
23	Gladman	Basic Conditions	1. LNP will need to ensure that it takes into account the latest guidance issued by the SoS so that it can be found to meet basic conditions (a) and (d).	The LNP does not seek to restrict truly sustainable development, on the contrary small-scale developments that provide housing, facilities and services that the village needs are positively encouraged. The Planning & Development Policies provide for larger schemes, providing that there is tangible and significant benefit directly to the village.
		SEA	2. It is currently unclear whether the LNP has been subject to SEA Screening, or whether a SEA is required in this instance. Given the nature of the LNP's proposals, Gladman suggest that there may be a requirement to undertake a full SEA to support the LNP's preparation. A failure to do so could mean that the LNP is not legally compliant and risk the neighbourhood plan failing to meet basic condition (f) when examined.	A full SEA Screening Report is provided within the appendix to the LNP.

			3. The new Local Plan was submitted for examination under the transitional arrangements that are set out in the Framework within Annex 1: Implementation. As a result, CBC has given recognition to the urgent need to review and update the emerging Plan and has committed to an early Partial Plan Review to take into account the significant changes associated with the Oxford- Milton Keynes - Cambridge Arc and the calculation of Local Housing Needs using the standard method (LHN) that is contained in the Framework and PPG. As acknowledged in the Submission Version of the CBC Local Plan⁴, LHN has led to a significant increase in the number of homes that will be required in Central Bedfordshire over the plan period 2015 to 2035. Any emerging neighbourhood plans in the CBC area will therefore need to be mindful of this changing position and ensure that their objectives, strategies and policies are suitably flexible and responsive to the increasing level of housing that will be required to address needs.	Noted
		Page 6	4. The Neighbourhood Plan includes text that sets out that it is an intention of the Neighbourhood Plan to make it clear that further large-scale housing developments are not supported. However, given the wider context of growing housing needs across Central Bedfordshire, it is important that all sustainable settlements such as Langford continue to make a positive contribution towards meeting development needs over time. Indeed, page 6 of the LNP goes on to explain that the LNP will require flexibility as new challenges and opportunities arise over the plan period. It is therefore vital that such flexibility is built into the LNP to ensure that sustainable forms of development can come forward without delay.	The LNP does not seek to restrict truly sustainable development, on the contrary small-scale developments that provide housing, facilities and services that the village needs are positively encouraged. The Planning & Development Policies provide for larger schemes, providing that there is tangible and significant benefit directly to the village.
		Section 1.9	5. A further general point is the lack of consistency between the proposed plan period of the Neighbourhood Plan (2019 to 2039) and the Plan Period for the emerging CBC Local Plan (2015 to 2035). This is despite section 1.9 of the LNP stating that the Langford Neighbourhood Plan will run concurrently with the emerging Central Bedfordshire Local Plan. It is our view that the plan period of the emerging Local Plan and the Neighbourhood Plan should be aligned	Noted and amended.

		Section 2.4	6. Includes a plan entitled: “ <i>Physical boundary constraints</i> ”. However, the associated OS Map shows the proposed settlement envelope for Langford. It is essential that settlement boundaries are treated in a manner that allows sustainable sites to come forward beyond the limits of the existing built form to accommodate development needs and ensure that communities can grow and thrive.	Noted. Now Section 2.5.
		Policy EN4	7. The emerging Local Plan allocates sites HAS30 and HAS31 (Land off Cambridge Road) and an outline planning application for residential development benefits from a resolution to grant (subject to S.106) (application reference: CB/19/00336/OUT). It is important that the LNP recognises that reserved matters applications should be supported where they are in line with an outline approval.	Gladman should have significant regard to the views of Langford residents concerning the content of the Langford Design Codes document, the Policies and associated data appended to the LNP.
		Policy EN4	8. The proposed policy also indicates that future development should not impact on ‘current and future protected areas’. Two such areas are described as the ‘Inner Triangle’ and areas to the north of the village (i.e. Langford Road). There is no basis for the blanket protection of these areas through this policy and is therefore not considered to have had sufficient regard to national policy.	The LNP does not seek to restrict truly sustainable development, on the contrary small-scale developments that provide housing, facilities and services that the village needs are positively encouraged. The Planning & Development Policies provide for larger schemes, providing that there is tangible and significant benefit directly to the village.

		Policy PD1	9. Whilst it is recognised that there have been a number of new housing developments in Langford over recent years, this has been as a result of the need for a positive response to housing needs in Central Bedfordshire and the sustainable nature of Langford. Despite what is stated in Paragraph 3 of this policy, the LNP is progressing at time when the full housing needs in the Local Plan have not yet been determined and there remain significant objections to the proposed housing requirement in the emerging Local Plan as explained in Section 3 above. Furthermore, the emerging Local Plan recognises that housing needs have increased and that a review of the Plan is needed in the short term to address this issue. As such, we suggest much greater flexibility will need to be drafted into this policy (and other policies within the LNP) to recognise that further development proposals will need to be positively considered during the plan period. Gladman have suggested how such flexibility could be incorporated in to the LNP through policy PD5 below	Noted
		Policy PD5	10. It is noted that 'Criterion 1' indicates that development should normally take place within the settlement envelope. As discussed in Section 3, additional flexibility will be required over the plan period to ensure that the growing housing needs of Central Bedfordshire can be accommodated in sustainable locations. This should therefore be acknowledged and reflected within the LNP. Seeking to limit development in such a way does not accord with the positive approach to growth required by the Framework. Gladman suggest that this policy should therefore be worded more flexibly in accordance with Paragraphs 11 and 16(b) of the NPPF (2019) and the requirement for policies to be sufficiently flexible to adapt to rapid change and prepared positively.	The LNP does not seek to restrict truly sustainable development, on the contrary small-scale developments that provide housing, facilities and services that the village needs are positively encouraged. The Planning & Development Policies provide for larger schemes, providing that there is tangible and significant benefit directly to the village. As such, there is sufficient flexibility within Policy PD5.

		Policy PD5	11. Accordingly, Gladman consider that the above policy should be modified to allow for this flexibility and it is considered that the LNP would be better served by a criteria-based approach consistent with the requirements of national policy and the following wording is put forward for consideration: <i>“The neighbourhood plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Development proposals that accord with the policies of the Development Plan and the Neighbourhood Plan will be supported particularly where they provide:</i> <i>• New homes including market and affordable housing; or</i> <i>• Opportunities for new business facilities through new or expanded premises; or</i> <i>• Infrastructure to ensure the continued vitality and viability of the neighbourhood area.</i> <i>• Development proposals that are considered sustainable and well related to the existing settlement will be supported provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development.”</i>	Noted
		Policy PD5	12. ‘Criterion 5’ should be redrafted to have regard to paragraph 108(c) of the Framework, which indicates that it should be ensured that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.	Current mitigation exercises have not resulted in improvements to capacity, congestion or safety, therefore the definition of ‘acceptable degree’ needs closer examination and challenged. This is provided for within Policy PD5.

		Policy PD5	13. It is noted that 'Criterion 6' seeks to introduce a maximum density standard of 30 dwellings per hectare. Density standards of this nature should be robustly evidenced. Furthermore, flexibility should be provided within criterion 6 to allow for higher densities to be justified in locations where this would represent a positive response to the specific characteristics of a site.	"In case of new developments, density should be appropriate to the location, responding to character of existing settlements areas. It is important that in future developments the rural character of the village is preserved". Due to the rural nature of Langford, anything over this number is comparatively high, therefore future development will need to take this figure into consideration as something not ideal for a rural context.
		Basic Conditions	14. Gladman recognises the Government's ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the LNP must be consistent with national planning policy and the need to take account of up-to-date housing needs evidence and the direction of growth outlined in the emerging Local Plan. If the plan is found not to meet the Basic Conditions at Examination, then the plan will be unable to progress to referendum	Noted
		Flexible Policies	15. The Parish Council must ensure that the policies within the LNP allow for sufficient flexibility and are based on robust and justified evidence.	Noted

24	Planning Prospects		1. At the outset, Planning Prospects note that the draft LNP sets out two main factors that have driven the need for the Plan. These are: a) To counteract and manage speculative building of homes in large numbers; and b) To secure the optimum amount of funding for the community through S106 obligations and/or Community Infrastructure Levy (CIL) payments From the outset, this suggests that the Plan is being progressed to stifle residential development in Langford and is contrary to national planning policy which sets out to boost significantly the supply of homes in support of the Government objective.	It is entirely inaccurate to suggest that these are the driving factors. The LNP does not seek to restrict truly sustainable development, on the contrary small-scale developments that provide housing, facilities and services that the village needs are positively encouraged. The Planning & Development Policies provide for larger schemes, providing that there is tangible and significant benefit directly to the village.
		Housing targets	2. With this in mind, the LNP sets out that its policies are entirely consistent with the objectives and policies of Central Bedfordshire's emerging Local Plan but since Langford has already 'fulfilled and vastly' exceeded its housing targets as detailed in the emerging Local Plan, it is deemed that no further residential sites need to be identified as part of the LNP.	It is recognized that further sites will come forward within the timescale of the LNP and Local Plans. These do not need to be identified from the outset. Each scheme should be evaluated on its own merit according to the policies laid out in the LNP, particularly with regard to providing the housing that the community needs and the direct community value added to the village and its residents.

		Policy PD1	3. Planning Prospects are promoting land to the west of Langford Road for residential development. The site is identified in the Neighbourhood Plan as an 'opportunity site.' However, this site along with the other 3 'opportunity sites' have been discounted by draft Policy PD1 'Housing Allocations' on the basis that Langford has exceeded its housing obligation as identified in the Central Bedfordshire emerging Local Plan.	Land west of Langford Road is not identified as an opportunity site in the LNP. Policy PD1 does not discount future development on opportunity sites. Each new scheme should be evaluated on its own merit according to the policies laid out in the LNP, particularly with regard to providing the housing that the community needs and the direct community value added to the village and its residents. The LNP does not seek to restrict truly sustainable development, on the contrary small-scale developments that provide housing, facilities and services that the village needs are positively encouraged. The Planning & Development Policies provide for larger schemes, providing that there is tangible and significant benefit directly to the village.
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		Policy PD1	4. It is inaccurate for the Neighbourhood Plan to declare that Langford has exceeded its housing needs in reference to Central Bedfordshire's emerging Plan as the true housing need figure required to support Central Bedfordshire's emerging Local Plan remains unconfirmed, with the emerging Plan itself subject to significant objection and fundamental concerns raised by its examining Inspectors. Numerous parties to the examination of the emerging Local Plan consider that the true housing need figure in Central Bedfordshire is considerably higher than provided for in the emerging Plan, which, if accommodated in line with its current spatial strategy, will result in Langford having to support an additional number of homes to ensure that Central Bedfordshire meets its housing needs going forward. With this in mind, LNP draft Policy PD1 needs to be more flexible to accommodate additional sustainable housing growth if required as anticipated.	See Appeal decision: Ref: APP/P0240/W/19/3236423
			5. Draft LNP Policy PD3 sets out that residential development schemes should not extend the village (ribbon) envelope to the north or south. Draft Policy PD5 sets out that development should normally take place within the Settlement Envelope, albeit provides some flexibility by stating that this is unless a scheme demonstrates significant community benefit. The NPPF and PPG are clear that blanket restriction of otherwise sustainable development should be avoided.	See Appeal decision: Ref: APP/P0240/W/19/3236423
		Page 6, Paragraph 4	6. The draft LNP sets out that, since it makes it clear that further large-scale housing developments are not supported in Langford, the emerging Local Plan should be bound in future to support Langford's wishes. This suggests that not only is the LNP not compliant with national planning policy but it is also going to be non-compliant with Central Bedfordshire planning policy.	Noted – LNP compliant.
		Policy PD2	7. The draft LNP identifies a local affordable housing need of 24 Affordable Homes and a market housing need of 15 market homes (based on a Parish Housing Needs Survey) and sets out support for suitable sites that will secure this provision. Whilst Planning Prospects do not consider that this reflects the true needs of Langford this nonetheless identifies a need for more affordable and market homes in Langford.	Noted, however there is a specific need for current residents in Langford.

		Policy PD2	8. The NPPF sets out that provision of affordable housing should not be sought for residential developments that are not major (defined in the NPPF as sites of 10 or more homes). The Central Bedfordshire emerging Local Plan requires provision of 30% Affordable Housing on qualifying sites, which it principally defines as sites of 11 homes or more.	Such housing provision has already been met. The Planning & Development Policies provide for larger schemes, providing that there is tangible and significant benefit directly to the village. These will attract the provision of 30% affordable housing.
		Policy PD3	9. In line with the LNP's stance against large-scale housing developments (comprising 10 homes or more), Policy PD3 of the LNP sets out that permission for small residential developments (of up to 10 dwellings) on infill and redevelopment sites (within the built-up area) will be supported. It is clear that large-scale housing sites (of 10 or more homes) are not supported in the draft LNP. LNP draft policy PD3 goes on to say that affordable housing could be delivered separately, or alongside development schemes where market housing cross-subsidises the Affordable Housing. In light of the above, there is no evidence to support that any Affordable Housing will be delivered from such sites as they will be too small to provide any Affordable Housing (either in accordance with the NPPF's suggested provision from schemes of 10+ homes; or the emerging Local Plan's suggested provision from schemes of 11+ homes).	See previous responses. Other than the triangle, larger-scale developments would be feasible. Sentence removed.

		S106	10. With regard to the second key driver behind the LNP, to secure optimum funding from S106 obligations, Planning Prospects' proposals present a sustainable location for housing development and the ability to provide numerous wider benefits for the community. The NPPF (paragraph 56) sets out that planning obligations must only be sought where they meet all of its tests which are: a) Necessary to make the development acceptable in planning terms; b) Directly related to development; and c) Fairly and reasonably related in scale and kind to the development The LNP's support for only minor residential development (10 homes or fewer) is of insufficient scale to justify significant (or material) funding towards the local community's identified projects.	We dispute that S106 funding is a key driver. See previous responses.
		PD2, TM2, TM3, EN2, IF2, IF6	11. Planning Prospects' proposals will provide 35% affordable housing which will contribute to the targets set by draft LNP Policy PD2 'Affordable Housing.' Moreover, the proposals will help to improve highway safety by providing footpath improvements including the widening of the footpath and extension of speed restrictions along Langford Road which directly complies with draft LNP Policy TM2 (part 9) 'Vehicles and Parking' and draft LNP Policy TM3 (part 1) 'Pedestrians, Pavements and Cyclists.' The development would also bring direct benefits to the community through the provision of a children's play area and wider sports and recreation provision for Langford and Biggleswade which directly relates to draft LNP Policy EN2 'Maintain, Develop and Extend Green Spaces and Safe Movement Around Them' and draft LNP Policy IF6 'Leisure and Spiritual Facilities, Clubs, Societies, Community Assets.' Draft LNP Policy IF2 'Schools and Education Facilities' outlines the challenges facing local schools as they are currently moving from a three to a two-tier education system. Planning Prospects' proposals will provide necessary contributions towards education provision throughout the tiered education system.	Noted

	Bloor Homes South Midlands on behalf of 6 Langford 'Triangle' Landowners	Vision	1. The Vision Statement should include a clear unambiguous statement of the proposed plan period as required by S38B(1)(a) of the 2004 Act. 2. The Vision Statement should also include <i>'current and future members of its community'</i>. 3. The NP should not be limited to the <i>'objectively assessed needs of the community'</i>. The NP is required to reflect the national policies set out in the NPPF (2019) which includes para 59 <i>'to support the Government's objective of significantly boosting the supply of homes'</i>. Strategic development plan policies are to be informed by a local housing need assessment, conducted using the standard method in national planning guidance, together with unmet needs from neighbouring areas. This assessment has not been carried out by CBC to date, due to 'exceptional circumstances' together with the submitted CBC Local Plan 2035 being prepared in accordance with the NPPF (2012). It is submitted that the LNP must reflect the NPPF (2019), where paragraph 69 encourages Neighbourhood planning groups to consider the opportunities for allocating small and medium-sized sites suitable for housing in their area. 4. In short Langford is not an island and rather forms part of the wider Ivel Valley, which is identified as a <i>'particular focus for development, creating a string of complementary settlements where new development improves their individual and combined sustainability'</i> (see CSDMP 2009 Policy CS1). This theme of the adopted development plan is continued in the submitted draft CBC Local Plan 2035 which seeks to <i>'Deliver ... new homes through villages, moderate extensions to existing towns and villages in line with the provision of new infrastructure and to meet identified housing needs close to key transport corridors'</i>, which includes the A1/East Coast Mainline corridor. The function of Langford to contribute to this growth strategy should be included within the LNP Vision.	Noted and amended.
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		Section 1.5	5. National Framework The summary of the NPPF should include the national objective '<i>to support the Government's objective of significantly boosting the supply of homes</i>' (NPPF paragraph 59) and the advice of NPPF paragraph 69, which encourages Neighbourhood planning groups to consider the opportunities for allocating small and medium-sized sites suitable for housing in their area. 6. Emerging Local Plan The summary of the Local Plan Examination is potentially misleading and should be amended to make it clear that the public examination is ongoing and 'the Inspector's' task is to consider the soundness. We respectfully submit that the LNP Consultation Draft fails to reflect the CBC Local Plan Vision (paragraph 4.1.1) and the Strategic Objectives as the LNP fails to reflect current national planning policy for new housing.	Noted.
		Section 1.6	7. We welcome the clear statement of the Plan Period from 2019 to 2039 but submit that this should be reflected in the Vision. Furthermore, the LNP should reflect the consequences of a plan period to 2039, which is four years longer than the CBC Local Plan 2035 and must therefore look beyond the horizon of the CBC Local Plan, particularly in respect of new housing requirements, assessed in accordance with the Standard Method.	Noted and amended.
		Section 1.9	8. We welcome the commitment to revisit LNP policies every two years, to ensure relevance and to monitor its delivery. However, we submit that the LNP should expressly acknowledge the commitment of the submitted CBC Local Plan 2035 to undertake a Partial Plan Review to commence within six months of its adoption and complete as soon as decisions have been made on routeing and financial commitment to strategic infrastructure area in the area. The strategic infrastructure investment is expected to include capacity upgrades of the A1, which may include off-line motorway construction north of Baldock, directly impacting on the LNP area	Noted.

		Section 2	9. This chapter of the LNP is deficient in that there is no reference to the National and Local Landscape Character Assessments. The submitted CBC Local Plan 2035 Policy EE5 – Landscape Character and Value requires all development proposals to have regard to the key characteristics and sensitivities of sites and their setting, as set out in the Central Bedfordshire Landscape Character Assessment. A similar approach is proposed in the LNP policies EN1 and EN2. It is therefore considered to be essential for the LNP to include an accurate and up-to-date Landscape Character Assessment reflecting the National and Central Bedfordshire LCAs, where Langford falls within LCA 4B Lower Ivel Clay Valley and 4C Upper Ivel Clay Valley with strong influence to the east from LCA 5G Dunton Clay Vale. The LNP would also benefit from a summary map regression illustrating the growth of the village and in particular the coalescence of Water End, Boot End and Flexmore End, with buildings strung along roads (see CBC Landscape Character Assessment para 4C.8). The LNP mapping should also be updated to illustrate the recent developments including the housing development at Flexmore End, both east and west of Station Road. The summary information at page 24 of the LNP appears to be disconnected.	Noted. Section 2.2 has been modified to include the Landscape Character Assessments and have also modified the introduction to Section 3, Policy EN1 and the introduction to Section 6 to reflect the importance of the LCA's to the Plan and to Langford. The full current LCA's for Langford can be found in Appendix J. Included.
		Section 2.4	10. This chapter of the draft LNP is unclear and short term. Constraint policies are short term and should not be seen as a bar to future development proposals in the light of the likely ongoing requirements in the medium term including the period post 2035.	Noted – now 2.5 and updated.

			11. The Langford Green Infrastructure Map is largely aspirational and the text in this section fails to identify any clear policy commitment or funding to deliver the aspirations including: • New Woodlands east of railway • Childrens Play Area and allotments (near Ivel Cottage) • Create a nature reserve with wildflower meadow, north of Wychway Farm • Create a wildlife and country park, east of railway • Open public access and create community allotment space and children’s play area/park/botanical garden with suitable access (between High Street and Station Road). In the absence of any clear policy commitments backed by adequate funding to deliver these aspirations, they should be deleted from the submission LNP. The Langford Green and Open Spaces map is misleading in showing parts of the Langford Triangle with this notation. The land has no public access and is under recent cultivation together with grassland supporting equestrian uses. The “triangle” has a limited public value and is inaccessible to the general public. Public views are limited to those from neighbouring properties and due to the local topography, there are limited locations where the entire site can be seen. There is no public right of access and no public footpaths within the site. The map should be amended to remove this notation from this area	Noted – the LPC continue to seek funding for these community assets from multiple sources. Other community-led projects are supported as they arise.
		Section 2.6, Appendix E	12. The Housing Needs Survey at Appendix E appears to be superficial and parochial, thereby failing to acknowledge the role of Langford as a Large Village (CSDMP Policy CS1 and submitted CBC Local Plan – Settlement Hierarchy) within the A1/East Coast Mainline Key Transport Corridor, capable to accepting ongoing growth within the LNP period to 2039. The attempt to limit further growth to ‘local needs’ conflicts with the national priority to significantly boost the supply of homes. Furthermore, the policy aspiration for new housing development to be limited to infill or small groups of dwellings is unlikely to provide new affordable housing as such development will be below the threshold for affordable housing provision (NPPF paragraph 63).	Noted (HNS conducted by BRCC with a significant track record in running such surveys).

		Section 2.11	13. The majority of the identified Community Priority Projects will not be delivered in the absence of S106 funding, which will only accompany new major residential development (10 or more dwellings). The policy aspiration to limit any new development to infill or small groups of development will be unlikely to result in any S106 funding due to the development being below the threshold for development providing S106 financial obligations (see PPG Paragraph 023 Reference ID 23b-023-20190901).	Noted – see previous response.
		Policy EN1	14. We OBJECT to Map EN1. The Langford Triangle is not a 'Green and Open Space'. There is no public access and the area is arable farmland under recent cultivation and grassland in equestrian use. Policy EN1 is misconceived and seeks to introduce requirements for new development proposals which are unrelated to the specific development site. In particular, it is inappropriate to require all new planning applications to 'demonstrate adequate parking provision for schools, healthcare, public amenities, churches, green spaces'. This is not supported by national or local validation requirements and should be deleted.	Noted – see previous response.
		Policy EN2	15. Policy EN2 is also misconceived and includes advisory text. The policy includes requirements which are not capable of being delivered by the limited scale of development proposed in the LNP.	Noted.

		Policy EN3	16. Aspirational and includes text which is justification rather than policy based. Furthermore, proposed development of less than 1ha area, within Flood Zone 1 is not required to demonstrate investigation of and attention to issues of river, flood plain and on-road flooding. This policy is not supported by national and local planning policies and technical requirements. Whilst the respondents accept that it is vital to maintain the character of the village, we would submit that the inner triangle referred to in Policy EN4 has never been identified as 'Important Green Space' and in particular is undesignated on the Langford Green Infrastructure Plan (April 2011) with the exception of limited areas described as 'Permanent Grasslands', some of which have been under arable cultivation. The "triangle" has a limited public value and is inaccessible to the general public. Public views are limited to those from neighbouring properties and due to the local topography, there are limited locations where the entire site can be seen. There is no public right of access and no public footpaths within the site. Furthermore, the LNP cannot presume to prejudge any future proposals for the 'inner triangle' or a northern extension.	Noted. New flood maps have been included. Noted. See previous. Noted. Ecological aspects to be included. Noted
		Policy IF1	17. Policy IF1 continues the aspirational tone noted above and is disproportionate to the level of development supported elsewhere in the plan. The thrust of Policy IF1 may be appropriate to new 'major' development proposals, but is inappropriate for all development proposals.	Noted. Level of detail commensurate with the size and type of development.
		Policy IF2	18. Policy IF2 suffers similarly and seeks to make disproportionate demands. 'New development' applications includes householder and minor applications for a range of proposals where schools and education facilities are not a material consideration. The text should be amended to refer to new 'major housing' development (ie. 10 or more dwellings). The provision of schools and education facilities is not normally material for non-residential development including employment, shopping, leisure or community uses, all of which are included in 'new development'	Noted. The level of detail should be commensurate with the size and type of development.

		Policy IF3	19. Policy IF3 should also refer to 'new major housing development'. Other non-residential proposals are unlikely to result in changes in local population.	Noted
		Policy IF4	20. Policy IF4 should omit references in policy text to proposals of Anglian Water over which the LNP has no control. The policy should also not repeat policy provision in the submitted CBC Local Plan 2035, which may be subject to change thereby resulting in policy conflicts. It is unreasonable to require an applicant to demonstrate the adequacy of electricity supply for current population and future expansion of the village, unrelated to the scope of any specific development proposal small or large. It is also beyond the power of LNP to require conformity with the Broadband Universal Service Obligation and to install superfast broadband on any new development. Building Regulations simply require provision for broadband installation. In any event broadband may not be required for 'any new development'. Finally, it is beyond the power of a developer or landowner to deliver 'quality, speed and robustness of the telecommunications network' within the parish. These proposals should be omitted.	Noted and amended.
		Policy IF5, Policy IF6	21. Policies IF5 : Economic Growth and IF6: Leisure and Spiritual Facilities, Clubs, Societies Community Assets are applauded but appear to overlap. These policies could be combined into a single policy. It is beyond the power of the LNP and most developers to facilitate new Clubs and Societies	Noted. Agreed to explore the merging of Policies IF5 and IF6. Now merged
		Policy TM1	22. The objectives of this section of the draft LNP are broadly supported. However, the requirement of Policy TM1 to require a Travel Plan for all development proposals for 10 new dwellings and above is not supported by CBC, where a TP is required at a significantly higher threshold. Bedfordshire County Council was long since abolished. The local highway authority is Central Bedfordshire Council. The draft policy lacks any local requirement and should be deleted as such matters are adequately addressed at CBC Local Plan level	Noted and amended.

		Policy TM2. Policy TM3	23. Policies TM2 and TM3 are aspirational and not NP policy. It is wholly unclear how the LNP will deliver the policy intentions including changes to marking of existing major roads and promote supervised 'bike trains' to encourage safe cycling to schools in Langford and Henlow.	Some points to be moved to the preamble as examples from residents.
		Policy TM4	24. Policy TM4 is also aspirational and unsuited to a LP seeking to address development and land use.	TM4 to be removed and replaced by aspirational comments.
		Section 6	25. The objectives of this section of the draft LNP are broadly supported but overlook the evolution of the identity and character and appearance of the area, in that Langford is no longer a ribbon village, but rather has developed in depth in a number of parts of the village. Furthermore, in the absence of any form of Landscape Character Assessment there is no clear, cogent baseline from which to judge Objective 2. The LNP in its current form fails to meet Objective 3, for the reasons set out earlier; namely its failure to reflect NPPF paragraphs 59 and 69 in particular. Objective 5 is unclear, as local expectations are ill defined and will change over time, making this unsound and vague. Objective 6 is strongly supported	Noted Langford Character Assessment now included and referenced. Langford is classed as a ribbon village.

		Policy PD1	26. The land off Cambridge Close (HAS30/HAS31) allocated in the Submitted Draft CBC Local Plan 2035 already benefits from a resolution to grant planning permission subject to S106 Agreement. In the likely event that planning permission is granted, there is no need for the LNP to allocate this site for development as it will be an existing commitment. Criteria 2 is misconceived as the Submitted Draft CBC Local Plan 2035 does not set out any 'housing targets' for the Langford Parish. Criteria 3 is also unsound for the same reasons. It is submitted that these criteria amount to a failure of the LNP to accord with NPPF paragraphs 59 and 69. Criteria 4 is unnecessary since development plans must be read as a whole and proposals are subject to the provisions of all relevant policies. The criteria does not provide a clear and unambiguous statement to assist the decision maker in determining a planning application. It is submitted that Policy PD1: Housing Allocations should be redrafted to confirm that the LNP makes no new housing allocations, if this is the wish of the Parish.	Noted.
		Policy PD2	27. The policy should not include a definition of 'affordable homes' as this conflicts with the National Planning Policy Framework which sets out a detailed definition in the glossary. The reference to the Housing Needs Survey should not form part of the policy. Paragraph 3 of the draft policy is noted but the term 'affordable market housing' is not recognised. The NPPF Glossary includes 'discounted market sales housing' as a sub-class within the overall term 'affordable housing'. The section numbering within Policy PD2 requires rationalisation. Section 4 deals with market housing, which should be a separate policy as this is not part of 'affordable homes'. Market housing cross-subsidising affordable housing is unlikely to be delivered for small sites. The LNP cannot require affordable housing for developments that are not major developments (defined as 10 or more homes or an area of more than 0.5ha), which would be contrary to national planning policy.	Noted. Updated.

		Policy PD4	28. The policy repeats the local objective to limit new development to small scale development (up to 10 units), which will not deliver any affordable housing. Criteria 4 is misconceived as small-scale developments (up to 10 units) is unlikely to deliver developments including alternative tenures. Criteria 10 sets out parking standards. Special justification should be given in the event that Langford Parish wishes to depart from the CBC Parking Standards. Furthermore, it is unlikely that small-scale developments will include proposals for public parking provision for the purposes set out in the last paragraph of Section 10.	Noted. Move 1st two paragraphs to preamble. 3rd paragraph modified. See previous responses on parking.
		Policy PD5	29. This policy is misconceived, in particular Langford is not situated within Green Belt and references to 'Green Belt' in criteria 2 and 3 should be removed. Criteria 4 is also contrary to national planning policy which does not support the requirement for affordable housing for small developments (up to 10 dwellings). Criteria 4 is therefore undeliverable. Criteria 5 is unsound and both should be deleted. Highway safety is adequately addressed in the National Planning Policy Framework and the Submitted Draft Central Bedfordshire Local Plan 2035.	Noted. Policy revised.



Langford Neighbourhood Plan

Appendix 6.7

Responses to Regulation 16 Consultation:

Langford Neighbourhood Plan, January 2021 – March 2021

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
4.1	CBC Flood Risk	EN1	Langford experienced flooding in Jan 2021, which has highlighted the inadequacies of the existing drainage to intercept, store and convey surface water runoff. This event has highlighted the need for new and re-development to assess the impact on the current and future flood risk of the area. The flooding experienced outside of the floodplain recently is surface water driven and the plan document should strengthen the policy drive to mitigate this risk throughout the document. We do not consider the plan sets out the need for catchment management of the flood risk and the need for new/redevelopment to contribute towards this. EN1 point 6 this wording is ambiguous, we consider this means existing 'public surface water or foul sewers, or other piped infrastructure off site'. The wording should be clarified. We welcome the principle of this section, and consider it should be applied to the strategic land drainage culvert from Jubilee Lane to adj. to Wrestlers Grove, highlighted in previous responses, and that thorough assessment of the impact on the flood risk from this be considered by new/redevelopment proposing to connect to this. We cannot see reference to this culvert has been made and consider this an omission of the Plan. We consider wording could be strengthened i.e.: Any development discharging into a surface water system (open or culverted) should prove the condition of the system and reduce the volume of water entering that system i.e. attenuation.	The flooding experienced outside of the floodplain recently is surface water driven and the plan should strengthen the policy drive to mitigate this risk throughout. We do not consider the plan sets out the need for catchment management of the flood risk and the need for new/redevelopment to contribute towards this. Possible move to Infrastructure? Accepted. LNP Page 21, IF1, new point 1; to read as suggested - 'Any development discharging into a surface water system (open or culverted) should prove the condition of the system and reduce the volume of water entering that system i.e. attenuation'. LNP Page 7, 1.2, para 2, 2nd line to read '.....allocated and windfall land and their impact upon the existing infrastructure' LNP Page 9, 1.4,4; to read '...and enhance infrastructure and key resources' LNP Page 20, Infrastructure Policies Objectives,3, to read '.....adverse impacts upon residents and the village environment.' LNP Page 20, new para 3 below the Objectives box: 'Recent surface water flooding and sewerage overflows into houses and gardens have increased the need for village infrastructure to be protected from enhanced demands and for new investments to be made to support new developments'

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
1.1	Examiner	EN1	Policy EN1 – “any other proposal that raises issues with sustainable development”: How are qualifying proposals going to be identified by a developer? Policy EN1: Please respond to the comments of CBC Flood Risk. Policy EN1 7: What are the “flood plain planning regulations” to which adherence is required? Policy EN1 10: Please respond to the comments of CBC Development Management and Gladmans.	Agreed to changes: see 5.1 See 4.1 To include references to: Gov.uk/guidance/flood-risk-assessment-for-planning-applications and https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zones-2-and-3 See 3.1 and 6.2

3.1	CBC Development Management	EN1	Policy EN1 - It is unclear as to when this policy will be triggered as it only relates to developments that "raises issues with sustainable development". Policy EN1 - This policy focuses on the evidence and information to be submitted with an application rather than the development itself. For example there is no requirement for a development to complement the character of the village but only to detail how the designer has sought to achieve this, whether successfully or not. Policy EN1 - 10. does not accord with the NPPF balancing exercise that applies to development which effects the significance of heritage assets. It also takes no regard to the significance of the assets that may be affected. Policy EN1 - 7. what is meant by "Flood Plain planning regulations" Policy EN1 - this policy seeks to support proposals which provide information about Langford. If is unclear when the information is required to be provided and areas of the policy may be irrelevant to some proposals.	See 5.1 We were asked to include a list of heritage assets, however we are unable to assess the significance of these as it is highly subjective. We acknowledge the importance of balance, but look to others to apply this. See 1.1 Preamble modified to read: 'The following policy (EN1) applies to all new developments within Langford. The policy acknowledges that the level of detail required should be commensurate with the scale, type and position of the development. A development consisting of a single dwelling for example may only need to provide a tick-list to demonstrate that the elements within the policy have been understood and confirmation that the development does not have significant impact on the village. This policy aims to ensure that Land Agents and/or Developers submit to CBC at each stage of a proposed new development accurate, up-to-date and non-ambiguous data and
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			Policy EN1 - The Policy should be clear, concise and simple and written in a tone that is fit for purpose.	that this detail is not overlooked or lost in the period of transfer between Land Agent and Developer. These issues have been raised as areas of concern by residents and/or Langford Parish Council.' Suggest EN1 modified to read: Based on the above summary; proposals for new housing, employment, retail, community or leisure use, or for any other proposal that raises issues with development will be supported where then can demonstrate: 1. Any impact on green spaces and how green space coverage will be improved (supporting evidence Appendix A: P58) 2. A proposal for maintenance of existing Parish Green spaces and how the new development provides new green areas or preserves existing green areas within the proposed development 3. Any additional green areas within the proposed development to include the following information: 3.1. Who will have access and by what means 3.2. Any times where access will not be available to the community 3.3. Proposal for maintenance and any costs associated with this 3.4. How issues relating to flooding might affect the area or be mitigated 3.5. How the proposal integrates with the transport and movement infrastructure in particular extra pressure on pavements, cycleways and bus links 4. An understanding of the Guidelines for new Development and the Landscape Management Guidelines contained in the current Type 4b and 4 Landscape Character Assessment (See Supporting Evidence Appendix G) and detail how they will adhere to them. 5. Sustainable solutions for surface water drainage, and wherever possible avoid connecting to the existing surface water drainage. 6. Adherence to flood plain planning regulations (Gov.uk/guidance/flood-risk-assessment-for-planning-applications and https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zones-2-and-3) and demonstrate the proposed development will not adversely affect the current water Framework Directive Status of Waterways in and around Langford.
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Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan		Steering Committee response/s and suggested revisions
				7. Detail how the proposed development complements the characteristics of the village and how it celebrates its composition and history, celebrating its composition and history, and evidence how this will be successfully achieved. 8. That the proposed development will not adversely impact on the buildings or sites identified in the Historic Environment Record for Bedfordshire 9. An understanding of the range and scope of the current nature reserve (Langford Meadows), wildlife, woodland and grassland areas within the parish and how these are complimented by the proposed development.	
5.1	CBC Planning Policy	EN1	It is unclear when this policy would be triggered as it currently only relates to development that 'raises issues with sustainable development'. We suggest amending as follows: 'Proposals for new housing, employment, retail, community or leisure use, or for any other proposal that raises issues with sustainable development, will be supported where they can...'. This helps to remove any ambiguity. Point '5' could be deleted as it is a continuation of Point 4. Point 9 could be reworded to ensure design is not only considered, but can also be delivered successfully. For example: 'Detail how the proposed development complements the characteristics of the village and how it celebrates its composition and history, evidence how this will be successfully achieved'.		Already modified within the submitted LNP. Remove sustainable. Text error rectified. Agreed to modify to read: 'Detail how the proposed development complements the characteristics of the village and how it celebrates its composition and history, and evidence how this will be successfully achieved'

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
6.2	Gladman Developments	EN1	Many of the bullet points within this policy concern what is essentially good practice, which is already enshrined within the NPPF and Building Regulations. It is important that duplication between the neighbourhood plan and Local Plans is kept to a minimum so as to reduce conflict and any disparity that may arise. More specifically point 10 makes reference to the impact that development may have on buildings or sites identified in the Historic Environment Record for Bedfordshire. This policy needs to make reference to the process identified to be carried out within the NPPF with particular reference to paragraph 195, which states that: <i>“Where a proposed development will lead to a substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.”</i> Alongside this it is necessary that the Policy EN1 takes into account the hierarchical approach to heritage assets set out within the NPPF, which recognises the different processes to judging impact upon designated heritage assets and non-designated heritage assets. When judging the impact upon a non-designated heritage asset, a balanced judgement is required which has regard to the scale of any harm or loss and the significance of the heritage assets.	Noted See 3.1

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
7.2	J&J Design	EN1	Whilst Policy EN1 is broadly supported, as currently drafted the policy is excessively prescriptive, seeking to extend 'material considerations' beyond the extent of and impacts from proposed development, as set out in the NPPF and PPG, together with national planning regulations. It is therefore not in accordance with national policies and advice set out in guidance from the Secretary of State and exceeds the reasonable requirements to contribute to the achievement of sustainable development. In particular, the policy fails to have due regard to NPPF paragraphs 91 and 92 which seek to promote healthy and safe communities. It therefore fails to meet Basic Conditions.	Noted. Grateful that the policy is broadly supported. Noted. All policies support paragraph 91 & 92. Noted. Examiner to make a judgement.
1.2	Examiner	EN2	Policy EN2 – "Whether or not the area has the capacity to accommodate the increased use": To what does "the area" refer? How is capacity to be measured? Policy EN2 6: What is the extent of the required input to the upgrade of the Riverside Walk?	'..area of green space' to be added. Use the words 'local demand' instead of capacity. Infrastructure, services, space, usage etc. needs to be in the mix. No means of measuring. Implications of change. Use the word 'perceived' based on resident opinion. Demands and expectations, public meetings, Facebook, leaflet drop, Langford Diary etc. Text amended to: 'DDA (Disability Discrimination Act) and Equality Act 2010 compliant where feasible. Sympathetic and sensitive upgrade with maintenance. CBC have made a proposal which includes routes, upgrades and connectivity. This is under discussion with LPC and not yet in the public domain'.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
3.2	CBC Development Management	EN2	Policy EN2 - It is unclear what is to be achieved by 1. - it does not state in the policy wording what infrastructure it relates to. Policy EN2 - The policy only requires a development to demonstrate one of the listed requirements to be supported due to the grammar and punctuation. Is this intended? Policy EN2 - 3. what is meant by "positive impact upon how use is made of" "any agricultural land it may involve" policy EN2 - 6. what is meant by "an input" does this require an improvement or would a small and incomplete contribution towards a bench sufficient to comply with the policy. policy EN2 - 10. should the contribution towards allotments be sufficient to meet the additional demand from the development, if a need is identified? Financial contributions need to pass the legal and policy tests.	Not clear to which policy this is referring to. Add `...the following:’ Remove ref to agricultural land and reword EN2.3 as: ‘There will be a positive impact on existing green spaces and their incorporation into proposed schemes’ See 1.2. Where there is an indicated perceived need from residents using questionnaire data and follow up as in 1.2.

4.2	CBC Flood Risk	EN2	EN2 point 7 we consider this should refer to flood risk from all sources not just the floodplain as per previous comments provided. Re point 7 the consultation statement response document states improvements as suggested to Policy EN1 and included water course constraints in Section 2.5 – however we cannot see this in the final Plan document.	Suggest the following changes: LNP 1.2, para 2, 2nd line; `.....allocated and windfall land and their impact upon the existing infrastructure`. LNP 1.4,4; `...and enhance infrastructure and key resources` LNP Infrastructure Policies Objectives,3, `.....adverse impacts upon residents and the village environment`. New para 3 below the Objectives box: `Recent surface water flooding and sewerage overflows into houses and gardens have increased the need for village infrastructure to be protected from enhanced demands and for new investments to be made to support new developments`. IF1, new point 1: `Any development discharging into a surface water system (open or culverted) should prove the condition of the system and reduce the volume of water entering that system i.e. attenuation`. IF1, new point 2: `New developments should not provide new surface water connections to the public sewer. Brownfield sites should remove any such existing connections and use alternative sustainable solutions to dispose of surface water run off`. 4.2 EN2 (should be EN1), 1.7, to now read: `Detail the adherence to current flood plain planning regulations and demonstrate how surface water flooding risks will be alleviated`. Flood risk moved to IF1.1 . EN1.7 amend to include the two links in 1.1. The LNP recognise the existing restrictions on urban drainage and the need for betterment for existing communities, through new/re-development.
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Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
5.2	CBC Planning Policy	EN2	This policy includes good examples of locally specific requirements that developers could contribute to and is generally helpful. It could however be argued that Bullets 2, 5 and 9 duplicate national policy and so it is questioned if these are necessary. Perhaps Bullet 4 could be incorporated into the design policy?	Noted
6.3	Gladman Developments	EN2	As identified within the general comments at the start of this section this is a policy which identifies a number of aspirations which are time specific and should not be included within the specific policy text. This is due to the issue of flexibility and for this policy and the plan as a whole to take into account future need. Instead of specific aspirations identified within the policy the steering group should instead be a strategy to monitor the needs and aspirations of residents on a regular basis so that the policy can react to future aspirations without being hindered by the policy. It is also important that the Steering groups also refer again to paragraph 56 of the NPPF 2019 and the requirements that obligations need to meet to be considered justifiable to be requested of future development and that the impacts upon viability must be taken into account when requesting these obligations.	These are long-term aspirations e.g. riverside walk has been ongoing since 1986. Reviewed by LPC every two years, and updated as required. Noted. Negative text, not commensurate with that which we can be use in our policies.
3.3	CBC Development Management	EN3	Policy EN3 - "SBD" is not defined Policy EN3 - should there be an "and" to ensure developments are required to accord with both aspects of the policy.	Secured by Design defined in the Glossary, LNP Page 3. Agreed to amend.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
5.3	CBC Planning Policy	EN3 & 4	Would it be helpful if these policies were incorporated into the design policy?	Discussed and noted.
1.3	Examiner	EN4	Policy EN4: What would constitute an adverse effect on the “inner triangle”. Where is the inner triangle defined (should this not be within the Plan)?	See 7.3 Piecemeal development without benefit to the village. Ref. to PD Policies. Consider moving to a Planning & Development policy as is a planning issue. Label on Map 3 and relevant image (LNP page 39) referenced within the policy. Updated map requested from CBC and attached.
3.4	CBC Development Management	EN4	Policy EN4 - it is unclear what an adverse affect on the inner triangle and length of the village would be. Is it seeking to require landscaping to the triangle, or to avoid increasing the length of the village. The policy is unclear.	See 1.3 and 7.3.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
6.1	Gladman Developments	General	This first section covers some general points about the policies of the LNP. As has been previously highlighted it is vital that flexibility is incorporated into the policies of the Neighbourhood Plan. A number of aspirations, including specific projects, of residents and the Neighbourhood Plan are identified and included within the policy text themselves. Policies IF1 to IF5 include a number of such aspirations. While there is nothing fundamentally wrong with identifying these aspirations, by including them within the policy it makes the policy time sensitive. Instead, these aspirations are better suited either within the supporting text or within a separate reference document with policies instead centred around enabling continual review of changing settlement needs. This enables the policies to retain flexibility and ensure that the aspirations are able to be kept up to date with the changing requirements of the Parish and its residents. Clarity within the Neighbourhood Plan is vital, this is both within specific policy wording and also within supporting text. As identified within the NPPF 2019 plans should “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”². As will be highlighted within individual policy responses below, some policies require greater clarity to enable them to be unambiguous so that they are applied correctly and consistently. It is important that the policies take into account the need to be proportional in their requests for contributions from development. The aspirations that the LNP identify to be brought forward by development such as the improvement of infrastructure and support to community buildings are unlikely to be achievable through the development of small schemes. Instead, they will be achieved primarily through funding from larger scale development which are able to provide larger financial contributions through S106 agreements and therefore be able to support community benefits. It is also likely that larger schemes will not be feasible just on infill and previously developed land and that greenfield development will be necessary in order to bring the benefits that the LNP is aspiring to deliver.	Monitoring and review processes by LPC every two years, updating resident views and amending as required. This gives flexibility within changing environments. Noted. Examiner to make a judgement. Noted. Examiner to make a judgement.

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7.9		General	We respectfully submit that the LNP Submission Draft fails to reflect the CBC Local Plan Vision (paragraph 4.1.1) and the Strategic Objectives as the LNP fails to reflect current national planning policy for new housing.	Noted. Examiner to make a judgement.
1.4	Examiner	IF1	Policy IF1: Please respond to the comments of Anglian Water. Policy IF1 – “developments raising sustainable infrastructure issues”: How are such developments going to be identified? Policy IF1 4: What is meant by “robustness of communication technologies” and how will this matter be tested? Policy IF4 1: Please respond to the comments of Anglian Water.	See 2.1. Accepted. Remove ‘sustainable’. Consider moving to PD Policies. Demonstrated by reports from suppliers showing that there is sufficient capacity for the proposed development prior to the development taking place. Modify to : ‘...will have no negative impacts on communication technologies’. Infrastructure must meet the minimum guaranteed levels within the contracts from suppliers to businesses and households. See 4.1. Modify to: ‘.. all developments over 10 houses’

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
2.1	Anglian Water	IF1	It is therefore proposed that Policy IF1 is amended as follows: ‘Actively consider the use of water re-use measures (e.g. rainwater and surface water harvesting and grey water recycling for non-potable use.’	Accepted
		IF4	It is therefore suggested that Policy IF1 is amended to refer potable water supply required to serve the development. That Policy IF4 be amended as follows: ‘1. Given that Anglian Water have stated that a new transfer route from their Ruthamford North zone to Ruthamford South is required by 2025 to ensure the continuing availability of potable water, m Major development proposals should demonstrate adequate access to potable water supply to serve the development.	Accepted
3.5	CBC Development Management	IF1	Policy IF1 - Define "sustainable infrastructure issues" -when does the policy apply. Policy IF1 - 6. the policy is not positively worded. Policy IF1 - 4. define robustness of communication technologies. Does this policy require fibre to the home for all new builds or is it seeking to achieve something else? Policy IF1 - 1. define "actively consider". Does the policy require developments to implement rainwater harvesting or just consider it?	See 1.4 Noted See 1.4 See 2.1

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
5.4	CBC Planning Policy	IF1	The terminology 'or for any other development that would raise sustainable infrastructure issues' is vague and it is not clear how this would be triggered. Perhaps the following would help: 'When submitting development proposals, particularly for new housing, employment, retail and community use, or for any other development that would raise sustainable infrastructure issues, applicants should :...'	See 1.4. Agreed, change to 'should'.
6.4	Gladman Developments	IF1	This policy contains a number of aspirations which result in a high level of inflexibility within Policy IF1. This could be rectified through a commitment to longer term monitoring rather than actively identifying aspirations within the policy. Additionally, and in relation to IF2, 3, 4 and 5 these policies reflect good practice and duplicate measures set out within both the currently adopted Core Strategy and the emerging Local Plan. The Written Ministerial Statement 2015 made clear that technical standards which relate to construction, internal layout or performance can only be progressed through a local plan based on need and viability. Taking this into account point 1 of this policy would be better removed, leaving the matter to the eLP to set out these requirements. Gladman would also urge the Steering Group to rethink point 6 of the policy which should acknowledge that the increase in jobs brought during construction phases and the increased spending brought by future residents are very real and tangible benefits generated for the local area. As identified previously it is important that any obligation sought must meet the three tests identified within the NPPF 2019.	Not aspirations, but aspects that developers should consider when developing a site. Noted. This is short-term only within the context of a long-term plan. Observations suggest that this is not the case. Noted

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
6.5	Gladman Developments	IF3	Gladman would recommend the incorporation of greater flexibility into this policy, primarily in the form of a consistently monitored evidence base and aspirations list. Any contributions sought from development will need to be in line with paragraph 56 of the NPPF 2019. The list of aspirations with regards to Health Care within the community includes some time sensitive elements within it, the policy needs to be flexible without these aspirations within the policy directly instead enable monitoring and the changing of future circumstances.	Strongly disagree.
3.6	CBC Development Management	IF4	Policy IF4 - 3. references an emerging policy. Should the policy simply require all new dwellings to achieve the water efficiency standard stated	Yes – all new dwellings.
6.6	Gladman Developments	IF4	The aspects raised within this policy are suitably governed by legislation and as such should be removed from the Neighbourhood Plan.	See 1.4

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1.5	Examiner	IF5	Policy IF5: What is meant by “community asset elements”?	Add examples such as: green space, sports areas, village halls, community meeting spaces, churches, shops, pub and clubs etc.
3.7	CBC Development Management	IF5	Policy IF5 - should this policy be worded towards "commercial uses, community facilities, leisure facilities and spiritual facilities"? The term "Community asset" is unclear	See 1.5
1.9	Examiner	PD1	Policy PD1: Essentially, this policy sets out a number of statements. Why is this policy necessary (see also comments of CBC Planning Policy)?	See 5.5. Agreed to remove Policy PD1 and relocate to statements in core aspirations. These provide examples of issues being recently faced.

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5.5	CBC Planning Policy	PD1	It's not clear if PD1 is really policy or if it is necessary. In particular: Bullet 1: this is essentially a statement and could be deleted. As the allocation within the emerging CBC Local Plan is set out within a strategic policy, there isn't actually scope for the Langford NP to deviate from it in any case. Bullet 2: this is also essentially a statement and it is unclear its purpose. Any housing delivered across CBC will be counted towards its overall housing delivery, for example in the context of the Council fulfilling its obligations under the Housing Delivery Test. Bullet 3: whilst the emerging CBC Local Plan does identify an allocation within the village, it does not identify a housing requirement per se. Any future development proposals will be determined in accordance with national and local policy. On this basis, the comment that development allocations are not needed within the Langford NP is again, a statement, but not necessarily accurate. It would be for any locally derived evidence to determine if there is/ or isn't a need for a specific allocation within the neighbourhood plan. Bullet 4: is unnecessary as it is taken for granted that any development proposals would be considered against relevant national, local and neighbourhood planning policies. It is suggested that this policy is deleted.	See 1.9

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6.8	Gladman Developments	PD1	It is an important clarification that accepting of an eLP allocation is not the same as identifying an allocation. As identified within the PPG (§103): “Neighbourhood Planning Bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change and allow plans to remain up to date over a longer time scale.” The housing requirement for Langford is a minimum figure not a maximum and larger residential site such as the allocation are able to contribute towards aspirations and projects more readily. As was identified within Gladman’s representations to the regulation 14 consultation, while there have been a number of new housing developments in Langford over recent years, this has been due to the housing needs in Central Bedfordshire and the sustainable nature of Langford (which has been recognised by the Council). It is important that the policy is flexible for the future housing needs of Central Bedfordshire and also Langford. While point 3 of the policy identifies that all the housing allocated by the emerging LP has been met in Langford, this is presumptive. Within the emerging Local Plan document and through the examination of the emerging Local Plan, Central Bedfordshire Council have recognised that housing needs have increased and that a review of the Plan is needed in the short term to address this issue. The policy as worded is therefore at risk of becoming outdated and redundant due to its inflexibility as previously suggested in the regulation 14 representations; the policy will need to recognise that further development proposals will need to be positively considered during the plan period.	See 1.9

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
7.6		PD1	We respectfully object to Policy PD1(1) as the CBCLP allocation sites HAS30 and HAS31 are subject to a CBC resolution to grant outline planning permission for 150 dwellings. Policy PD1(3) fails to meet Basic Conditions as an attempt to resist any further development sites within the LNP fails to have regard to national policy to significantly boost the supply of homes (NPPF paragraph 59) and to maintain supply and delivery (NPPF paragraphs 73-75). Furthermore, Policy PD1 appears to conflict with the proposed CBCLP Policy SP1a – Partial Review (MM8) commencing within 6 months of adoption of the CBCLP. The LNP should not fetter the discretion of CBC to identify and allocate new development sites, especially in response to the proposed Oxford-Cambridge Arc Spatial Strategy together with anticipated commitments from central government on improved and new strategic infrastructure including the proposed upgrade of A1 to motorway.	See 1.9
1.10	Examiner	PD2	Policy PD2: Is the referenced provision part of or additional to that made in the emerging Local Plan? Policy PD2 1 – “current housing need”: Is this a reference to need for affordable housing?	The LNP Housing Needs Survey is a piece of evidence to support the LNP and deals with local need. Housing need in the Local Plan is considered on a district-wide basis and as such the LNP HNS would not feed into the Local Plan process, particularly given the advanced stage that emerging CBLP is now at. This provision would be additional to that in CBLP, identified to meet local needs. Yes - the need exists for the period of time the HNS is valid for (5 years).

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
5.6	CBC Planning Policy	PD2	Clarity is required if the need identified in this policy is additional to what is already planned (for example the Local Plan allocation referenced in PD1). If this is the case, there would be an inconsistency with PD1. If this is not the case, then it could be argued that the policy is not actually required.	See 1.10

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6.9	Gladman Developments	PD2	The policy does not reflect the necessary flexibility needed to ensure this policies longevity. The need for Central Bedfordshire and correspondingly Langford is likely to change when sites currently being built out or sites with planning permission are completed. Additional flexibility will be required over the plan period to ensure that the growing housing needs of Central Bedfordshire can be accommodated in sustainable and suitable locations. This should be acknowledged and reflected within the LNP. Seeking to limit the development in such a way as the LNP seeks to does not accord with the positive approach to growth required by the Framework. Gladman suggest that this policy should therefore be worded more flexibly in accordance with Paragraph 11 and 16(b) and of the NPPF (2019) and the requirement for policies to be sufficiently flexible to adapt to rapid change and prepared positively. The policy also requires some clarity, the policy identifies that at present there are 24 households identified as being in housing need. The policy then goes onto identify 12 units of affordable housing would be supported. This does not meet the housing needs identified serving only half of the households in current housing need. The policy also sets out a very specific distribution of affordable housing types which would be supported, this makes the policy inflexible to any changing circumstances and does not appear to reflect the evidence base relied upon where there appears little link to the breakdown of 1-, 2- and 3-bedroom units identified within the policy. This does not provide clear justification for this mix. Instead, it may be better to utilise the emerging housing mix identified within the emerging Local Plan this will have taken into account the viability of the provision of affordable housing and the identified preferred mix. The majority of affordable housing is often brought as part of a larger market housing scheme thereby provision should be made for these larger market housing schemes within the LNP rather than just limiting future development to small-scale scheme.	Policies review every two years by the LPC, reflecting any changes within the Parish. See 1.10. See 1.10

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7.7		PD2	The current CSDMP Policy CS7 seeks 35% affordable housing provision as part of new housing development. The emerging CBCLP Policy H4 seeks 30% affordable housing for development of qualifying sites of 11 or more units. It is therefore unrealistic to seek to limit new market housing to 15 dwellings whilst also seeking 12 units of affordable housing, unless the LNP is proposing to identify a 'Rural Exception' site compliant with CBCLP Policy H5. Policy PD2 also fails to reflect national policies and guidance due to the omission of any provision for Self-Build and Custom-building housing. For the above reasons, we respectfully submit that Policy PD2 fails to meet Basic Conditions.	Noted Noted Noted. Examiner to make a judgement.
1.11	Examiner	PD3	Policy PD3 1: What are considered to be the "protected green spaces" and from where does the protection arise?	Reference to LNP Map 2 and Appendix B6 should be included. Replace "protected green spaces with 'identified green spaces'. See 7.3.

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6.10	Gladman Developments	PD3	Clarification is sought with regards to this policy. The policy starts by discussing infill and redevelopment of sites within the Parish, but then identifies that these schemes should not extend the settlement envelope to the north or south. There appears here to be a disjoint in the policy, the settlement envelope only covers a specific area, which does not include the emerging allocation or development which has now been built out, nor does it include the entire parish which is covered by the LNP. Gladman would recommend a change of wording to the policy to instead make reference to dwellings on infill and redevelopment sites within the settlement envelope that lie outside the protected green spaces and delete the final sentence of point 1. As previously discussed, it is important that the Steering Group ensures that the settlement envelope is up to date. The envelope shown within the LNP does not include a number of developments that have now been built out and completed, nor does it include the allocation which the LNP accepts. This means that there is development approved and identified as part of the emerging Local Plan (also with outline planning permission) which is at odds with the settlement envelope of the emerging LNP.	Policy supported by the outcome of appeal: CB/18/04783/OUT (January 2020). The Settlement Envelope will be reviewed by CBC through Local Plans, and not through Neighbourhood Plans. Necessary changes to the boundary have been made through the emerging CBCLP and any changes required in the future will be made in the next CBCLP.

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7.8		PD3	A neighbourhood plan must not constrain the delivery of important national policy objectives. Paragraph 13 of the NPPF is clear that neighbourhood plans should support the delivery of strategic policies contained in local plans and spatial development strategies. Qualifying bodies should plan positively to support local development, shaping and directing development in their area that is outside these strategic policies. More specifically paragraph 29 of the NPPF states that neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies. NPPF paragraph 59 sets out the national objective '<i>to support the Government's objective of significantly boosting the supply of homes</i>' and the advice of NPPF paragraph 69, which encourages Neighbourhood planning groups to consider the opportunities for allocating small and medium-sized sites suitable for housing in their area. We submit that Policy PD3 limiting residential developments to ten dwellings is not in conformity with national policy and fails to meet Basic Conditions. Furthermore, there are no strategic policies in the current development plan (CSDMP) or the emerging CBCLP which support this approach to local housing development in the LNP period.	Noted Demand has already been met. Strongly supported by local residents.

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5.7	CBC Planning Policy	PD3/5	PD3/ PD5 These policies partly duplicate Local Plan and National Policy. There is also potential inconsistency between the two policies, and it may be more successful to combine these into one. There is also scope to improve the clarity of the policy, particularly identifying the difference discussed in the supporting text between smaller and larger infill schemes. The Planning Policy Team therefore suggest the following combined policy: ‘Policy PD3 Infill Development, Development Scope and Housing Density Infill Development: Proposals will be supported for small residential developments of up to ten dwellings on infill and redevelopment sites within the Parish that lie outside the protected green spaces. Proposals should be within the built-up area, be of a high quality, should not impact on the character of the area or the amenity of neighbours, and where possible, define a complementary housing mix. Housing Density Proposals for development will be supported where they do not exceed 30 dwellings per hectare.’	Agreed to amalgamate, retaining elements within both and suggested wording changes.

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3.11	CBC Development Management	PD4	Policy PD4 - 10. Car Parking. Would this apply to householder developments even at the back of a cul-de-sac?	Yes.
5.8	CBC Planning Policy	PD4	Section 3.3 Placemaking and Design Codes of the LNP Background Evidence Report includes useful place specific information. This includes information regarding typical roof lines, materials and design characteristics of Langford, to name a few. Bullet 5 could make reference to this to bolster the policy. For example: 'Development should seek to create a place with a locally inspired or otherwise distinctive character which does not conflict with that of the existing housing stock. Section 3.3 of the LNP Background Evidence Report provides further information as to the character of the settlement which should inform future planning proposals.	Agreed to amend.

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6.11	Gladman Developments	PD4	Good quality design is an integral part of sustainable development. The Ministry of Housing Communities & Local Government have undertaken a consultation on a new draft of the National Model Design Code and as previously mentioned, the NPPF. The changes have been influenced by the report from the Building Better Building Beautiful Commission and to ensure that beauty and place making is a strategic theme in the NPPF as such flexibility to take into account these future changes is vital. It is important that the LNP incorporates paragraph 126 of the NPPF 2019 when considering Policy PD4. This paragraph highlights that design policies should not aim to be overly prescriptive. Policies require some flexibility in order for schemes to respond to site specifics and the character of the local area. In essence, there will not be a 'one size fits all' solution in relation to design and sites should be considered on a site-by-site basis with consideration given to various design principles. While Gladman support the Steering Groups ambition to reducing carbon emissions and the use of EV charging points, Gladman contend that this must be demonstrated and justified through the evidence base and subject to viability testing to ensure that the policy is deliverable. It is considered that this policy would be more appropriately contained within the eLP which identifies that the provision of charging points will be negotiated on a case-by-case basis until the adoption of a Local Transport Plan.	Langford Design Codes provide for this. Not in Para 126. We maintain our position until the eCBCLP and LTP are in place. Review processes allow for change.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
1.12	Examiner	PD5	Policy PD5 2 – meaning of “in this respect”: Is this paragraph to be applied to schemes showing “appropriate and direct community benefit” (as in the first numbered paragraph)? Policy PD5 2: What is a “site inset from greenfield land”? Policy PD5 4: What is meant by “complementary housing mix”? Is it envisaged that qualifying developments will be supported <i>anywhere</i>, irrespective of the locational criteria elsewhere in the policy?	Modify to .. should meet at least one of the following criteria:’ Modify to read: ‘Is on the edge of greenfield land’ Move point 4 to the position of point 2 for clarity. Existing point 2 edit to ‘All new developments’ Modify to: ‘... a mixture of housing types and sizes, as reflected in the Housing Needs Survey’ PD5.1 to include health and education facilities.
3.12	CBC Development Management	PD5	Policy PD5 - 4. is this policy seeking to support development beyond settlement envelopes, where the development is less than 10 units? Or is it seeking for a small rural exception site? Policy PD5 - Para 4 conflicts with paras 1 and 2 of Policy PD5 Policy PD5 - 1. define "normally".	See 5.7

6.12	Gladman Developments	PD5	Gladman wishes to support point 1 of the policy which accepts the possibility of development outside of the settlement envelope when criteria are met, this will help to enable the LNP to support future housing need. In particular Gladman would like to express their support that developments outside of the settlement envelope which bring benefits for the community are acceptable. It is a main aim of the NPPF that policies should not limit sustainable development form coming forward, particularly paragraphs 11 and 16(b) of the NPPF (2019) and the requirement for policies to be sufficiently flexible to adapt to rapid change and prepared positively. It is important to incorporate policies which cater for the presumption in favour of sustainable development contained in the National Planning Policy Framework. Gladman do however raise questions of clarity with regards to some aspects of the criteria raised within the policy. Point 2 identifies that sites outside of the settlement envelope may need to demonstrate that the site represents limited infilling within the village or previously developed brownfield. The areas which meet this requirement will, usually, be located within the settlement envelope and as such it is uncertain how a site outside of the settlement envelope would be able to comply with these parts of the policy. Point 2a identifies sites which are inset from greenfield land, Gladman would request further clarity as to what sites this may include. It should also be noted that the community benefits which the Steering group identify are unlikely to be brought forward on limited infill sites within the village or previously developed brownfield land. By their very nature, schemes at these locations are likely to be constrained, physically by the size of site but also in terms of viability due to the cost of redevelopment the sites. This is likely to reduce chances of both affordable housing and any community benefits being delivered. The plan needs to be flexible and needs to be able to respond to local changes or a lack of a five-year housing supply. Point 4 makes reference to applications of small developments being supported within this context, clarity is required to define what the context for these small developments are. Are these small-scale schemes also needing to be in conformity with points 1 or 2 as well? Support the aspect of the policy which enables flexibility for development outside the settlement envelope where criteria are met, also needs to be flexible for housing need in the future. Gladman would like to express their support that developments	Contradictory to their previous responses. We consider that the Policies provide sufficient flexibility. See PD5.1 See PD5.1 See 1.10 See 1.12 Noted
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Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
			which provide benefits for the community and are outside the settlement envelope are acceptable. Gladman would seek clarification as to some of the criteria raised within the policy. Point 2a identifies sites inset from greenfield land, as the settlement envelope includes the existing built development of Langford (excepting some development), how can a site be inset from greenfield land and also within the settlement envelope? As stated in Gladman's previous representations and as a theme throughout these representations there is a need for additional flexibility will be required over the plan period to ensure that the growing housing needs of Central Bedfordshire can be accommodated in sustainable locations. Point 6 of the policy seeks to introduce a maximum density standard of 30 dwellings per hectare. Density standards of this nature should be robustly evidenced. Furthermore, flexibility should be provided within the LNP to allow for higher densities to be justified in locations where this would represent a positive response to the specific characteristics of a site.	See 1.12 Noted See Langford Design Codes. See 5.7.
7.4	J&J Design	Recent development	In particular, in addition to the 2011 Allocations Sites recent development has taken place at Kingsley Farm Station Road Langford (110 dwellings) bounded by Station Road, Cambridge Road, the East Coast Mainline Railway (ECML) and Jubilee Lane, pursuant to an appeal decision in 2015. Further development (48 dwellings) at Flexmore Way is omitted from the 2018 Proposals Map. These sites are identified in the LNP Background Evidence (page 283).	Superseded by Map 3 in the LNP. Your figure of 48 dwellings in Flexmore Way is incorrect, as only 41 dwellings were built. This is not a Proposals Map. It shows developments in Langford from April 2016 – see LNP Page 28, paragraph 7. See also 7.1

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan		Steering Committee response/s and suggested revisions
5.9	CBC Planning Policy		Delivery and Implementation Although this section provides good place specific information, more detail could be provided of the delivery and implementation of both the plans aims, goals and policies. It would be useful to consider including some next steps within the section and how monitoring of the plan and it's polices will be conducted.	Agreed to modify preamble on P14 of the LNP to read: 'The Langford Neighbourhood Plan will run concurrently with the emerging CBC Local Plan and will apply until 2035. It is however, a response to the needs and aspirations of the local community as understood today and it is recognised that current challenges and concerns are likely to change of the plan period. Langford Parish Council as the Qualifying Body, will be responsible for maintaining and periodically revisiting this Plan and this will be brought in line with all other Parish Policies (review every two years). Monitoring of the Plan and Stakeholders adherence to it will be carried out primarily by LPC with input from interested residents. This adherence should become transparent as Planning Applications are fed through from CBC to LPC for comment. The Parish Council are aware of the importance in ensuring the Plan is kept up-to-date. They consider resident comments to be an important factor of this review process. Electronic and non-electronic platforms will be provided for Parishioners and Stakeholders during the review period to ensure all parties are afforded the opportunity to review and comment on reviews of the NP. Langford Parish Council also recognises that there are a number of aspirations in the Langford Neighbourhood Plan. Many of these require funding and/or community involvement if they are to be implemented. Langford Parish Council will seek funding and community volunteers to enable progress to be made on the aspirational aspects of the Plan.'	

7.3	J&J Design	NPPF (2019) paragraphs 99 and 100 set out advice on Local Green Space (LGS). No LGS designations are included in the CSDMP. However, the LDF (North) Proposals Map 2011 – Langford Inset 33 identifies areas of Important Open Space together ‘Open Space, Sports and Recreation’ under Policies DM5 and CS3/DM17 respectively. LNP Map 2 identifies Green Open Spaces and Tree Preservation Orders. It would appear that the LNP is seeking to designate Local Green Space in accordance with paragraphs 99 and 100 of the NPPF. It is submitted that the proposed Green Space designations should be tested against these criteria. Areas designated on the Green and Open Spaces map do not all appear to meet the criteria set out at paragraph 100 of the NPPF. In particular the land between High Street and Station Road known as “the Langford Triangle” has no public access and was under recent cultivation together with grassland supporting equestrian uses. The land has a limited public value and is inaccessible to the general public. Views are limited to those from neighbouring properties and due to the local topography, there are limited locations where the entire site can be seen. There is no public right of access and no public footpaths within the site. In the light of the above, we respectfully submit that the Langford Triangle is an excessive tract of land (7.22ha), which is not ‘demonstrably special’ and has no particular local beauty, historic significance or recreational value. Furthermore, it is not an area of tranquillity and is low in wildlife value. For all these reasons, we OBJECT to Map 2. It is submitted that the designation of the Langford Triangle as Local Green Space is inappropriate and the map should be amended to remove this notation from this area. Furthermore, Map 2 seeks to designate other areas which are not identified in the Langford Proposals Map Inset 33 and also on the submission draft CBCLP Proposals Map Inset 34 (see Appendices 1 and 2).	See 1.3 and 1.11. The “Triangle” is a unique Langford feature which is defined as the open area inside of the three roads forming a triangle: High Street, Station and Cambridge Roads (see LNP Map2). This area is privately-owned by separate landowners, with no public access. It is an open space consisting of mostly farmland. This is an area identified by residents in the LNP Questionnaire as desirable to retain or enhance in some form. We recognise that Neighbourhood Plans can designate ‘Local Green Space’ but there is a detailed assessment process involved and this hasn’t been undertaken as part of the LNP, nor via a Green Infrastructure Plan. The LNP has just identified existing green spaces.
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Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
1.6	Examiner	TM1	Policy TM1: How will a developer determine what are “sustainable transport issues”.	Agreed to remove `sustainable`. Include CBC definition of Sustainability in Planning on P8 of the LNP.
3.8	CBC Development Management	TM1	Policy TM1 - define "sustainable transport issues". Policy should be worded to clarify when it applies.	See 1.6
6.7	Gladman Developments	TM1	The requirements for future development proposals set out within this policy duplicate good practice and information that is already required by the Council within the adopted and emerging Plans. This is therefore repetition and is not required and should be deleted as a policy.	Noted

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
1.7	Examiner	TM2	Policy TM2 3: What is the relevance of the reference to “the assumed restriction of the urban drainage”?	Modify TM2 3 to refer to: ‘Any traffic calming measures should not impede water flow within the urban drainage system’.
3.9	CBC Development Management	TM2	Policy TM2 - 3. this section refers to traffic calming measures and urban drainage, the connection between the two is unclear.	See 1.7
1.8	Examiner	TM3	Policy TM3 4: Having regard to the comments of CBC Development Management, please clarify the requirements of this provision.	See 3.10. Refers to any new dwellings. Need to modify text for clarity.

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
3.10	CBC Development Management	TM3	Policy TM3 - 4. does this seek a dropped kerb for existing dwellings along a new or improved footpath connection or for new dwellings?	See 1.8

Resp. no.	Group, organization, society, club, business etc.	LNP Section/ Policy/Page ref.	Your feedback on the Draft Langford Neighbourhood Plan	Steering Committee response/s and suggested revisions
7.5	J&J Design	Unique inner-triangle feature	Whilst the primary road network comprises Langford Road/Church Street/High Street (A6001), together with Station Road and Cambridge Road, the historic pattern of development with a number of Ends (Boot End, Flexmore End and Water End) are now consolidated into a continuous line of frontage development with development in depth east of Station Road, north of King George V Playing Fields and eastwards along East Road. Village expansion to the east has been constrained by the ECML railway and to the west by the River Ivel and its floodplain. Local planning policy and decision making has permitted consolidation of the road frontages between the traditional ends, leaving the Langford Triangle undeveloped. Active arable use has recently ceased and the area is now partly fallow and partly equestrian grazing. The LNP Consultation Statement records that local views on the area include the view that <i>“The Triangle ... is infill and has limited access/amenity for much of the village”</i>. In the light of the above, the Objective <i>“to preserve the character of Langford as a ribbon village with a unique inner ‘triangle’”</i> feature is not in general conformity with the strategic policies of the development plan, in particular Policy CS1 of the CSDMP and the emerging CBCLP which seek to concentrate new development in the A1 Corridor – Arlesey, Biggleswade, Sandy and north to Tempsford, as an ongoing Growth Area. The LNP in its submitted form fails to meet Objective 3, for the reasons set out below; namely its failure to reflect NPPF paragraphs 59 and 69 in particular.	See 7.3 See PD Policies

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7.1	J&J Design		Appendices 1 & 2	Our advice is to use current maps for planning (not 2011 when significant developments have taken place, especially since 2016).



Langford Neighbourhood Plan

Appendix 6.8

Response to Inspection Modifications:

Langford Neighbourhood Plan, May 2021 – June 2021

Proposed modification number (PM)	Page no./ other reference	Modification	Steering Committee response/s and suggested revisions
PM1	Page 16	Replace the text of Policy EN1 with the following: “Proposals will be supported where they address the following matters, where relevant and appropriate: 1. Avoidance of negative impacts on existing green space and improvement of green space coverage. 2. Maintenance of existing Parish green space areas and how this complements the preservation of areas in the proposed development. 3. Who will have access to any additional green space within the proposed development and by what means; any times (if any) when there will be no access to the community; who will be responsible for the maintenance schedule and costs associated with the proposed area/s; how any flooding would be mitigated; and how the area/s integrate with the transport and movement infrastructure (see Policies TM1 to TM3) with particular regard to pavements, cycleways and bus links. 4. Adherence to the Guidelines for New Development and the Landscape Management Guidelines relevant to Landscape Character Areas Type 4A and 4B (Background Evidence Appendix G). 5. Avoidance of connections to public surface water or foul sewer systems or other piped infrastructure off site and use of sustainable solutions. Brownfield sites which do not use the existing drainage network will be supported as will schemes which	All text replaced as advised, but please see point 5 below. Should there be an inclusion relating to connections to public networks such as “All connections to public networks should seek to increase capacity”?

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		improve the existing network. 6. Adherence to flood plain planning guidance <i>[insert footnote or hyperlinks referencing the guidance]</i> 7. Avoidance of adverse effects on the current Water Framework Directive status of waterways in and around Langford. 8. Achievement of development that complements the characteristics of the village and how it celebrates its composition and history. 9. Conservation of buildings or sites identified in the Historic Environment Record for Bedfordshire and avoidance of harm in a manner appropriate to their significance. 10. Understanding of the range and scope of current nature reserves (Langford Meadows), wildlife, woodland and grassland areas within the Parish and how these are complemented by the proposed development.”	
PM2	Page 18	Change the first sentence of Policy EN2 to read “Schemes will be supported where, as relevant and appropriate, they demonstrate the following:”. In Criterion 1, replace “Whether or not” with “With regard to usage and all forms of movement,”. Replace Criterion 3 with “Resistance to the loss of agricultural land and open field views unless there are significant community benefits”.	All text edited as advised, however we would prefer not to include “.. as relevant and appropriate,” as we feel this is more ambiguous.

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		In Criterion 6, replace “An input to” with “Contribution to”.	
PM3	Page 19	In Policy EN3, replace “SBD” with “Secured by Design” and add “; and” at the end of the first numbered criterion.	All text edited as advised.
PM4	Page 19	Identify the “inner triangle” on a plan within the Neighbourhood Plan and cross refer to this plan in Policy EN4.	Completed.
PM5	Page 21	Replace the opening of Policy IF1 with the following: “Where relevant and appropriate, development proposals shall:”. Replace Criterion 1 with the following: “Use water re-use measures (eg rainwater and surface water harvesting and grey water recycling) for non-potable use.” In Criterion 4, replace “a positive impact on the robustness of” with “no negative impacts on”. Replace Criterion 6 with the following: “Demonstrate that the character and level of retail provision in the village will be respected and that a positive contribution will be made to the village’s economic future.”	All text edited as advised, however we have a query regarding point 4. “..no negative impacts on” suggests also a neutral impact is acceptable. We would prefer to rephrase this to suggest an improvement.
PM6	Page 21	At the start of Policy IF2, insert “Where justified,”.	Text amended as advised. Does this make it too loose? Point 2: for clarity, we would like to add “Langford” before “school places”.
PM7	Page 22	At the start of Policy IF3, insert “Where justified,”.	Text amended as advised. Does this make it too loose?

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PM8	Page 22	In Policy IF4 Criterion 2 (3), replace the words after “new houses” with “so that potable water consumption does not exceed 110 litres/per person/day”. Delete Criterion 3 and renumber those that follow accordingly.	Text amended as advised.
PM9	Page 23	At the end of the text supporting Policy IF5, add “Such community asset elements include green space, sports areas, village halls, community meeting spaces, churches, shops, pubs, clubs and the like.”	Added to Policy IF5.
PM10	Page 25	Replace the opening to Policy TM1 with the following: “When submitting development proposals, applicants are required to supply accurate information based upon up-to-date data which:”.	Text amended as advised.
PM11	Page 26	In Policy TM2, Criterion 3, replace “given the assumed restriction of the urban drainage, which gives” with “that do not impede water flow within the urban drainage system and give”.	Text amended as advised, however we would request that we modify further to read “Incorporate appropriate and effective traffic calming measures (as necessary). They must not impede water flow within the urban drainage system. They should also give regard to the impact on flood risk..”.
PM12	Page 26	Substitute the following for the first nine words of Policy TM3 Criterion 4: “Benefit from a dropped kerb to each new dwelling”.	Text amended as advised.

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		Point 3: “.. appropriate and effective traffic calming measures (where as necessary. They must not”	
PM13	Page 28	Delete Policy PD1 and edit the supporting text accordingly.	Text amended as advised.
PM14	Page 31	In the first paragraph of Policy PD2, change “Appendix: E” to “Appendix C” and “current housing need” to “need of affordable housing”. Delete the heading “1 Housing needs” and place the whole of the first paragraph (as amended) under the “2 Affordable housing” heading. Re-number accordingly.	Text amended as advised.
PM15	Page 32	In Policy PD3, substitute “Green Open Spaces (Map 2)” for “the protected green spaces”.	Text amended as advised.
PM16	Page 38	In Policy PD5 Criterion 1, delete “normally”. In Criterion 2, Substitute “on the edge of” for “inset from”. Move Criterion 4 so that it follows Criterion 1. Re-number accordingly. After “housing mix”, insert “as reflected in the Housing Needs Survey”.	Text amended as advised.
