

Planning Policy Team
Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford
MK42 9AP



Sent by email to:
planningforthefuture@bedford.gov.uk

18 July 2019

Dear Sir / Madam

**Carlton and Chellington Neighbourhood Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight 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 previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.

Specific Comments

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

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



Electricity Distribution

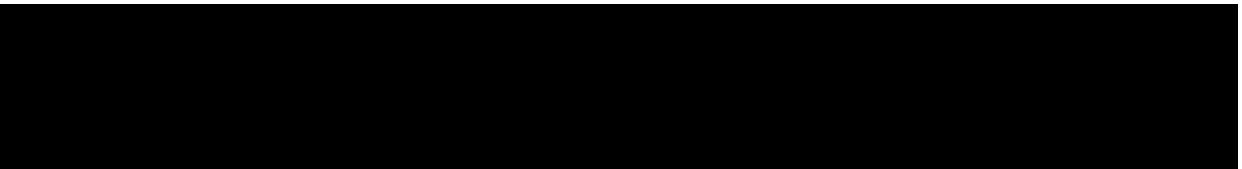
The electricity distribution operator in Bedford Borough Council is UK Power Networks. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.



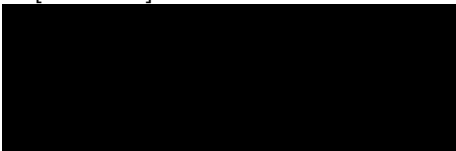
Wood E&I Solutions UK Ltd
Nicholls House
Homer Close
Leamington Spa
Warwickshire
CV34 6TT

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

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

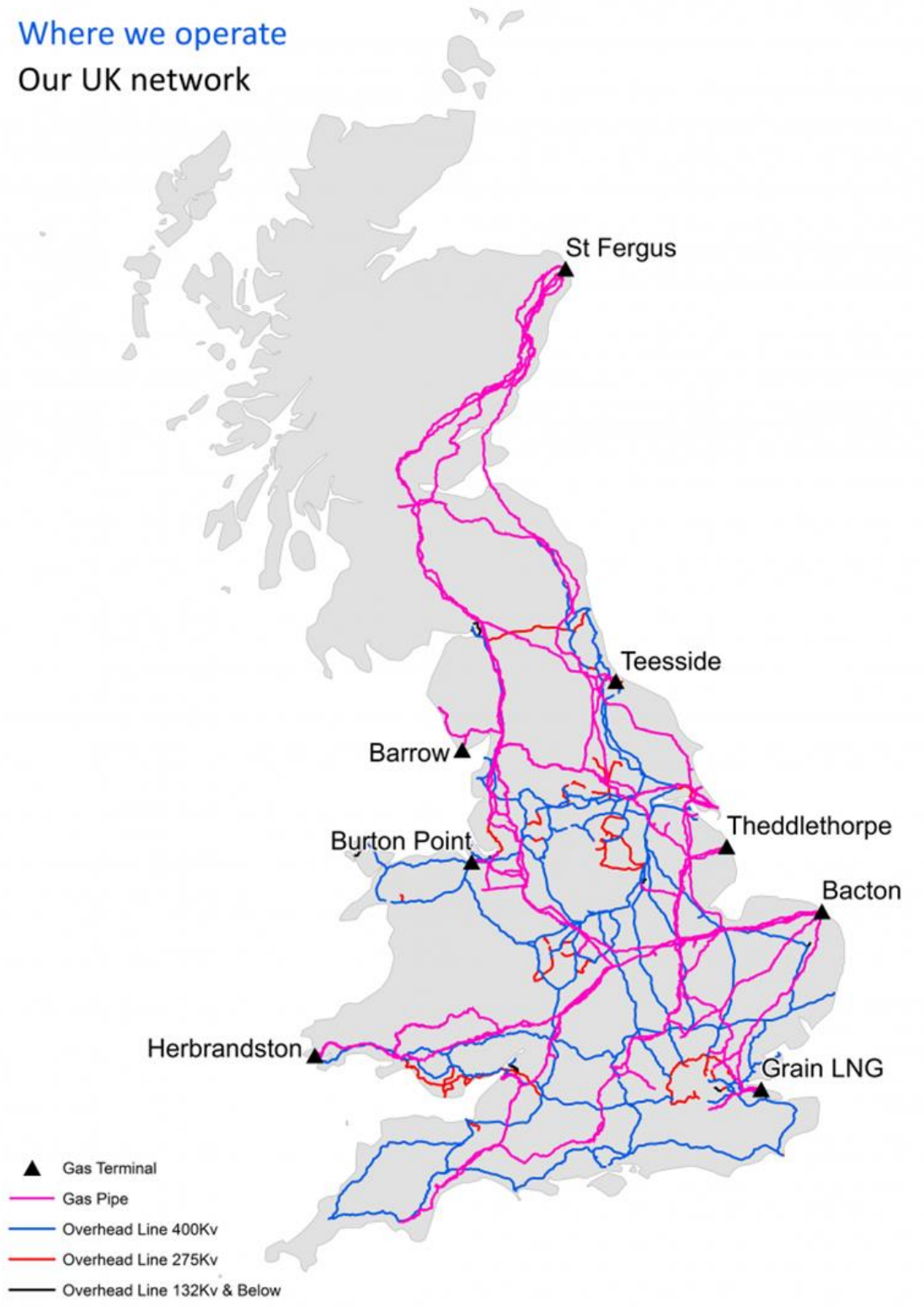
Yours faithfully

[via email]



APPENDIX 1: NATIONAL GRID'S UK NETWORK

Where we operate
Our UK network



PART B – please include a separate form for each comment.

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	CC5 – CC7
------------------	--	-------------------	-----------

**Do you support, oppose, or wish to comment on this paragraph?
(Please select one answer)**

- Support
- Support with modifications
- Oppose
- Have comments

Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)

Anglian Water has previously commented on the above policies and had suggested the inclusion of additional criteria relating to the capacity of water and water recycling infrastructure. In response to the Parish Council has stated that there are existing Borough wide polices and that there is no need for a similar policy to be included.

As the development plan is intended to be read as a whole we have no further comments to make in relation to the Neighbourhood Plan.

Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet if necessary).

PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?
(please select one answer)**

No, I do not wish to participate at an oral examination ✓

Yes, I wish to participate at an oral examination ○

Please note the Examiner will determine whether an oral examination is necessary.

If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)

If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.

Please notify me ✓

[REDACTED]

From: [REDACTED]
Sent: 23 June 2019 19:41
To: planning for the future
Subject: Carlton and Chellington

Categories: Ack sent

I am in full support of the submitted Neighbourhood Development Plan, however I would suggest that those involved in agreeing any development take extra note of the materials and **colour** of the materials used in the construction.

I cite as an example the orange roof tiles allowed in the development in The Causeway, Carlton. From a street view the orange tiles are not in keeping with the remainder of the village properties and in stark contrast to the surrounding countryside. From the Carlton Hill approach they are seen as a blot on the landscape drawing the eye from the beautiful countryside around and beyond.

Developers and their architects need to take note of the existing properties and try to blend their creations into their surroundings and not as in this particular case.

Regards

[REDACTED]

From: [REDACTED]
Sent: 24 June 2019 11:00
To: planning for the future
Subject: Re: Carlton and Chellington Neighbourhood Development Plan and Oakley Neighbourhood Development Plan

Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon,

Thank you for consulting AVDC on the neighbourhood plan for Carlton and Chellington. Having considered what it proposes and any potential impacts on Aylesbury Vale, we have no objection and no comments to make.

Kind regards,

[REDACTED]

Neighbourhood Planning Officer Aylesbury Vale District Council
Planning Policy
Community Fulfilment
The Gateway
Gatehouse Road
Aylesbury
HP19 8FF

[REDACTED]

From: Planning Policy [mailto:Planning.Policy@bedford.gov.uk]
Sent: 12 June 2019 11:29
To: Planning Policy
Subject: Carlton and Chellington Neighbourhood Development Plan and Oakley Neighbourhood Development Plan

Carlton and Chellington Neighbourhood Development Plan
Oakley Neighbourhood Development Plan

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Carlton and Chellington Parish Council and Oakley Parish Council have submitted their Neighbourhood Development Plans to Bedford Borough Council. In accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, Bedford Borough Council is inviting representations on the Carlton and Chellington Neighbourhood Development Plan and the Oakley Neighbourhood Development Plan for a period of 6 weeks.

The submission plans and supporting documents are available to view on the Council's website at: www.bedford.gov.uk/neighbourhoodplanning. Paper copies of the documents are also available for inspection during normal opening hours at the following locations:

- Bedford Central Library, Harpur Street, Bedford, MK40 1PG
- Bedford Borough Customer Service Centre, Horne Lane, Bedford, MK40 1RA

[REDACTED]

From: [REDACTED]
Sent: 12 June 2019 14:09
To: planning for the future
Cc: [REDACTED]
Subject: FW: Carlton and Chellington Neighbourhood Development Plan and Oakley Neighbourhood Development Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the Neighbourhood Development Plans referred to below

Best wishes

[REDACTED]

[REDACTED]

I work part time and so there may be a short delay in responding to emails

We have recently made changes to our pre-application service and charges, and introduced a new Initial Screening process. For more information please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

From: Planning Policy [mailto:Planning.Policy@bedford.gov.uk]
Sent: 12 June 2019 11:31
To: [REDACTED]
Subject: Carlton and Chellington Neighbourhood Development Plan and Oakley Neighbourhood Development Plan

Carlton and Chellington Neighbourhood Development Plan
Oakley Neighbourhood Development Plan

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, Carlton and Chellington Parish Council and Oakley Parish Council have submitted their Neighbourhood Development Plans to Bedford Borough Council. In accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, Bedford Borough Council is inviting representations on the Carlton and Chellington Neighbourhood Development Plan and the Oakley Neighbourhood Development Plan for a period of 6 weeks.

The submission plans and supporting documents are available to view on the Council's website at: www.bedford.gov.uk/neighbourhoodplanning. Paper copies of the documents are also available for inspection during normal opening hours at the following locations:

- Bedford Central Library, Harpur Street, Bedford, MK40 1PG
- Bedford Borough Customer Service Centre, Horne Lane, Bedford, MK40 1RA

Representations must be made in writing (preferably using the consultation form provided on the website) and can be:

PART B – please include a separate form for each comment.

To which part of the document does your representation relate?

Paragraph Number	ALL	Policy Reference:	ALL
------------------	-----	-------------------	-----

**Do you support, oppose, or wish to comment on this paragraph?
(Please select one answer)**

- Support**
- Support with modifications
- Oppose
- Have comments

Please give details of your reasons for support/opposition, or other comments in the box below. If objecting, please give details of the grounds on which you are objecting. Please be as precise as possible. (Continue on a separate sheet if necessary)

I **fully support** the 'Carlton and Chellington Neighbourhood Plan'.

The Carlton and Chellington Parish Council have gone to great lengths to create this plan ensuring the following:

- The local community has been enabled to have constructive input ensuring a long term vision for the local area.
- Environmental considerations.
- Housing, Infrastructure and Movement.
- Heritage and Countryside.
- Community Facilities.
- Employment.
- Many experts have been consulted to ensure accurate information in many different subjects.

Please set out what change(s) you consider necessary to make the Plan able to proceed, related to the objection you have raised. You should say why this change will enable the Plan to proceed. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet if necessary).

PART C

The majority of examinations are expected to be through written representations. Should the Examiner decide there is a need for an oral examination (hearing), please state below whether you would like to participate.

**If an oral examination is necessary would you like to participate?
(please select one answer)**

No, I do not wish to participate at an oral examination

Yes, I wish to participate at an oral examination

Please note the Examiner will determine whether an oral examination is necessary.

If an oral examination is required, please outline why you consider that your participation is necessary: (Continue on a separate sheet if necessary)

If you would like to be notified of Bedford Borough Council's decision to 'make' the Plan under Regulation 19 (to bring it into legal force), please tick the box below.

Please notify me

Planning Policy Team
Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford
MK42 9AP

Gladman House, Alexandria Way
Congleton Business Park
Congleton, Cheshire
CW12 1LB

By email only to: planningforthefuture@bedford.gov.uk

23rd July 2019

Re: Carlton & Chellington Neighbourhood Plan Submission (Reg 16) Consultation

Dear Sir/Madam,

This letter provides Gladman Developments Ltd (Gladman) representations in response to the draft version of the Carlton & Chellington Neighbourhood Development Plan (CCNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in neighbourhood planning, having been involved in the process during the preparation and examination of numerous plans across the country. It is from this experience that these representations are prepared.

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in §8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the CCNP 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.

Revised National Planning Policy Framework

On the 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously

through the Housing White Paper. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy.

§214 of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Submission of the CCNP ultimately occurred after this date, and the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2018 and corrected in February 2019.

National Planning Policy Framework and Planning Practice Guidance

On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework (NPPF2018). This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft NPPF2018 consultation. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy.

The Revised 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. Crucially, the changes to national policy reaffirm the Government's commitment to ensuring up to date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 13 states that:

“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.”

Paragraph 14 further states that:

“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

- a. The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;**
- b. The neighbourhood plan contains policies and allocations to meet its identified housing requirement;**

c. The local planning authority has at least a three-year supply of deliverable housing sites (against its five-year supply requirement, including the appropriate buffer as set out in paragraph 73); and

d. The local planning authority's housing delivery was at least 45% of that required over the previous three years."

The Revised Framework also sets out how neighbourhood planning provides local communities with the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development needed to meet identified housing needs. Neighbourhood plans should not promote less development than set out in Local Plans and should not seek to undermine those strategic policies. Where the strategic policy making authority identifies a housing requirement for a neighbourhood area, the neighbourhood plan should seek to meet this figure in full as a minimum. Where it is not possible for a housing requirement figure to be provided i.e. where a neighbourhood plan has progressed following the adoption of a Local Plan, then the neighbourhood planning body should request an indicative figure to plan taking into account the latest evidence of housing need, population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

In order to proceed to referendum, the neighbourhood plan will need to be tested through independent examination in order to demonstrate that they are compliant with the basic conditions and other legal requirements before they can come into force. If the Examiner identifies that the neighbourhood plan does not meet the basic conditions as submitted, the plan may not be able to proceed to referendum.

Planning Practice Guidance

Following the publication of the NPPF2018, the Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018 with further updates being made in the intervening period. The updated PPG provides further clarity on how specific elements of the Framework should be interpreted when preparing neighbourhood plans.

Although a draft neighbourhood plan must be in general conformity with the strategic policies of the adopted development plan, it is important for the neighbourhood plan to provide flexibility and give consideration to the reasoning and evidence informing the emerging Local Plan which will be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested against. For example, the neighbourhood planning body should take into consideration up-to-date housing needs evidence as this will be relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan¹. This should be undertaken through a positive and proactive approach

¹ PPG Reference ID: 41-009-20160211

working collaboratively and based on shared evidence in order to minimise any potential conflicts which can arise and ensure that policies contained in the neighbourhood plan are not ultimately overridden by a new Local Plan.

It is important the neighbourhood plan sets out a positive approach to development in their area by working in partnership with local planning authorities, landowners and developers to identify their housing need figure and identifying sufficient land to meet this requirement as a minimum. Furthermore, it is important that policies contained in the neighbourhood plan do not seek to prevent or stifle the ability of sustainable growth opportunities from coming forward. Indeed, the PPG emphasises 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

Relationship to Local Plan

To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The adopted development plan relevant to the preparation of the Carlton & Chellington Neighbourhood Plan area, and the development plan which the CCNP will be tested against is the Bedford Borough Council Core Strategy & Rural issues. This document was adopted in April 2008 and set out the visions, objectives, spatial strategy and overarching policies to guide development in the District from 2001 - 2021.

The Core Strategy sets a housing requirement of 19,500 dwellings between 2001 and 2021 (975 dpa). Bedford are currently proceeding through the Examination in Public for their Local Plan, which will cover the period from 2015 to 2035. With this in mind, Gladman suggest sufficient flexibility is provided in the policies of the plan to safeguard the CCNP from conflicting with future development proposals should they be required.

In this context, section 38(5) of the Planning and Compulsory Purchase Act 2004 states:

‘if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).’

Carlton & Chellington Neighbourhood Development Plan

² Paragraph: 001 Reference ID: 50-001-20160519

This section highlights the key issue that Gladman would like to raise with regards to the content of the CCNP as currently proposed. It is considered the requirements of national policy and guidance are not always reflected in the plan. Gladman have sought to recommend a modification to ensure compliance with basic conditions.

Policy CC1: Settlement Policy Area Boundary and Design Principles

Policy CC1 identifies a settlement boundary for Carlton & Chellington and states that there is a presumption in favour of sustainable development within the settlement boundary, subject to compliance with the CCNP and the development plan. Gladman object to the use of settlement boundaries if these preclude otherwise sustainable development from coming forward. The Framework is clear that sustainable development should proceed. Use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a) and (d).

As currently drafted, this is considered to be an overly restrictive approach and provides no flexibility to reflect the circumstances upon which the CCNP is being prepared. Greater flexibility is required in this policy and Gladman suggest that additional sites adjacent to the settlement boundary should be considered as appropriate. Gladman recommend that the above policy is modified so that it allows for a degree of flexibility. The following wording is put forward for consideration:

“When considering development proposals, 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. Applications 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 adjacent to the existing settlement will be permitted provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.”

Indeed, this approach was taken in the examination of the Godmanchester Neighbourhood Plan. Paragraph 4.12 of the Examiner’s Report states:

“...Policy GMC1 should be modified to state that “Development ...shall be focused within or adjoining the settlement boundary as identified in the plan.” It should be made clear that any

new development should be either infill or of a minor or moderate scale, so that the local distinctiveness of the settlement is not compromised. PM2 should be made to achieve this flexibility and ensure regard is had to the NPPF and the promotion of sustainable development. PM2 is also needed to ensure that the GNP will be in general conformity with the aims for new housing development in the Core Strategy and align with similar aims in the emerging Local Plan.”

Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the CCNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic condition (a) in its conformity with national policy and guidance and is contrary to (d) the making of the order contributes to the achievement of sustainable development for the reasons set out above.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours faithfully,



Gladman Developments Ltd.

Date: 23 July 2019
Our ref: 285568



Bedford Borough Council

BY EMAIL ONLY

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



Dear Sir/Madam

Carlton and Chellington Neighbourhood Development Plan

Thank you for your consultation on the above dated 12 June 2019.

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.

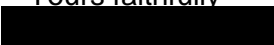
Natural England does not have any specific comments on this neighbourhood plan.

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:



Yours faithfully



Consultations Team

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

Natural environment information sources

The [Magic](#)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](#)⁵ website and also from the [LandIS website](#)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.

Landscape

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://www.gov.uk/government/publications/national-planning-policy-framework--2>

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

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 112. 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.

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

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>

- 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/>



Historic England

By e-mail to: [REDACTED]
Manager for Planning and Housing Strategy
Bedford Borough Council

Our ref: PL00428622
Your ref:
Date: 26/07/2019

Direct Dial: [REDACTED]
Mobile: [REDACTED]

Dear [REDACTED]

Ref: Carlton and Chellington Neighbourhood Plan Regulation 16 Consultation

Thank you for your correspondence dated 12 July 2019 inviting Historic England to comment on the Regulation 16 Submission version of the Carlton and Chellington Neighbourhood Plan.

We welcome the production of this neighbourhood plan, but do not wish to provide detailed comments at this time. We would refer you to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. To avoid any doubt, this letter 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 NP, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

[REDACTED]

Historic Places Advisor, East of England

[REDACTED]



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

