



Caddington & Slip End Neighbourhood Plan 2016 – 2031

A report to Central Bedfordshire Council on the Examination of the Caddington & Slip End Neighbourhood Plan

By:

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Independent Examiner

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Neighbourhood Plan submitted
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Abbreviations

CBC	Central Bedfordshire Council
CaSENP	Caddington and Slip End Neighbourhood Plan 2016-2031
CaSEPCs	Caddington and Slip End Parish Councils
CaSENPSG	Caddington and Slip End Neighbourhood Plan Steering Group
LPA	Local Planning Authority (CBC)
NDP	Neighbourhood Development Plan
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SEA	Strategic Environmental Assessment

Non Technical Summary

This report concludes that, as submitted, the Caddington and Slip End Neighbourhood Plan does not fully meet the Basic Conditions as required by statute, but with the appropriate modifications that expand the text, it can be recommended to be taken forward to Referendum.

The modifications needed to meet the statutory requirements can be summarised as follows:

Modify the Neighbourhood Plan by inserting text that sets out a concise account of the close working of the Local Planning Authority with the Steering Group and the relationship of the Neighbourhood Plan to the emerging Local Plan; correcting references to the extent of the Green Belt within the Neighbourhood Plan area; and making other minor changes to the text for clarification or correction of errors.

The specified modifications recommended in this report are based on matters discussed during the public hearing sessions and do not significantly alter the basis of the overall approach and policies of the Neighbourhood Plan.

1. Introduction

1.1 I have been appointed by Central Bedfordshire Council (CBC), with the consent of Caddington and Slip End Parish Councils (CaSEPCs), to carry out the independent examination of the Caddington and Slip End Neighbourhood Plan (CaSENP), in accordance with the relevant legislation¹. My appointment has been facilitated by the Independent Examination Service provided by Trevor Roberts Associates.

1.2 As required by the legislation, I am independent of CaSEPCs and CBC, I do not have an interest in any land that may be affected by the draft plan, and I have appropriate qualifications and experience. I am a chartered town planner (Fellow of the Royal Town Planning Institute) with wide experience in local and central government and private consultancy over a period of 40 years.

1.3 In carrying out this examination I have had regard to the following documents:

- Caddington and Slip End Parish Neighbourhood Plan, Submission Version, April 2017
- Caddington and Slip End Parish Neighbourhood Plan, Basic Conditions Statement, February 2017
- Caddington and Slip End Parish Neighbourhood Plan, Consultation Statement, February 2017

¹ Localism Act 2011, Town and Country Planning Act 1990 as amended Planning and Compulsory Purchase Act 2004 as amended, The Neighbourhood Planning (General) Regulations 2012 as amended, Neighbourhood Planning Act 2017

- Caddington and Slip End Parish Neighbourhood Plan, Background Evidence and Sustainability Appraisal Scoping Report, February 2017
- Caddington and Slip End Parish Neighbourhood Plan, Sustainability Appraisal incorporating Strategic Environmental Assessment - Final Report, February 2017
- Central Bedfordshire Statement regarding European Directives compatibility (of the CaSENP), August 2017
- Caddington and Slip End Parish Neighbourhood Plan, Green Belt Assessment Paper, September 2016
- Caddington and Slip End Heritage Greenway – two papers -Northern Section and Southern Section, January 2015
- Background and supporting documentation on the Caddington and Slip End Parish Councils' websites
- Caddington and Slip End Housing Needs Survey Report, August 2013
- Caddington and Slip End Site assessment methodology and web-based consultation
- Caddington and Slip End Site Assessment Matrix and Overall Assessment
- Individual Representations
- South Bedfordshire Council Local Plan Review, adopted January 2004
- Pre-Submission Central Bedfordshire Local Plan 2013-2035

1.4 Throughout the process of preparing the CaSENP between 2012 and 2017 Caddington and Slip End Neighbourhood Plan Steering Group (CaSENPSPG) sought to engage and consult the community. The means of doing so included newsletters, visits to 'hard-to-reach' groups, larger scale community events, surveys, an exhibition design event and workshops and via social media. It is clear that a great deal of commitment and effort has gone into the production of the CaSENP, and that it is founded on a desire to protect and enhance the character of the parishes.

1.5 Representations on the CaSENP were submitted by Anglian Water, CBC Flood Team, Eila Goss, Historic England, JB Planning, JLL, Natural England, Savills, Sport England, and Thames Water. I have taken all these representations into account.

1.6 Representations mainly concern the extent to which the Basic Conditions have been met with regard to i) the need to have regard to national policy and advice issued by the Secretary of State, and whether the evidence supporting the plan is proportionate and robust; ii) whether the plan contributes to the achievement of sustainable development; iii) whether the plan is in general conformity with the strategic policies in the development plan for the area. Other more minor matters were raised that I deal with in due course to the extent that it is necessary.

1.7 Wherever possible, the examination of the issues by the examiner should be by consideration of the written representations. The examiner must cause a hearing to be held where it is necessary to ensure adequate examination of a particular issue, or where it is necessary to give a person a fair chance to put a case. In this instance, the plan itself and the written representations left me in some doubt as to whether the matters i) to iii) set out in paragraph 1.6 had been adequately met and I reluctantly came to the view that it was necessary for a hearing to be held.

1.8 This report and my reasoning and conclusions are based on the submitted written material and representations, the discussions at the hearing and the subsequent response by CBC and CaSENPSPG to my Post-hearing Note requesting revisions to the text of the plan that those parties would wish me to recommend.

2. Location and characteristics

2.1 The CaSENP area is situated along an escarpment at the eastern end of the Chiltern Hills and covers the whole of the two parishes of Caddington and Slip End. To the north and east of the area is Luton Borough whilst Dunstable lies to the northwest. The A5 Watling Road forms the western boundary of Caddington Parish, with the M1 on the eastern side. The two parishes are rural in character and are wholly washed over by the South Bedfordshire Green Belt except for the built up areas of the villages of Caddington and Slip End. There are significant parts of the Plan area that are within the Chilterns Area of Outstanding Natural Beauty. In this context, I note the mention in the Introduction to the Plan that the Borough of Luton has a development plan policy seeking large scale development to the west beyond the Borough boundary.

2.2 Within the CaSENP area are the villages of Caddington and Slip End together with the hamlets of Woodside, Pepperstock and part of Aley Green. The total population is around 5,534 (2011 census figure) within approximately 2,400 households. In terms of economic activity, about 66% of the population are in some form of employment and 3% are unemployed. Full time students account for 2% of the population, and the retired 19% (with 10% classified as "Other"). About 65% of travel to work is by car. Between the two villages there is a good range of shops and professional services, together with leisure and sports facilities, hotel and food and drink outlets, churches and meeting places, and educational facilities.

3. The basis for this examination

The Basic Conditions

3.1 A Neighbourhood Plan must meet the Basic Conditions as prescribed in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act, 1990. In brief, the basic conditions which must be met by the CaSENP are:

- it must have regard to national policy and advice issued by the Secretary of State
- it must contribute to the achievement of sustainable development
- it must be in general conformity with the strategic policies in the development plan for the local area
- it must not breach, and must be otherwise compatible, with EU obligations, including human rights requirements
- it must not have a significant adverse effect on a 'European site' (under the Conservation of Habitats and Species Regulations 2010).
- it must comply with other prescribed matters.

3.2 I deal in more detail with each of these conditions below.

3.3 The examination is intended to be carried out with a 'light touch'. I am not concerned with the 'soundness' of the plan², as in the examination of a Local Plan, but whether it meets the basic conditions and other prescribed matters.

² See Planning Practice Guidance: Paragraph: 055 Reference ID: 41-055-20140306
Revision date: 06 03 2014

3.4 As noted above, in order that I could be better informed about several issues pertinent to the neighbourhood plan, I requested that a hearing should be held to explore these matters. This took place on Thursday 15 March at The Heathfield Centre, Hyde Road, Caddington. I took the opportunity to visit the NP area, unaccompanied, the day before. The hearing was attended by representatives of the CaSENPSG, officers of CBC, Regulation 16 parties and members of the general public. I had arranged for an agenda to be circulated in advance.

4 Assessing the Plan against the Basic Conditions

Have regard to national policy and advice issued by the Secretary of State

4.1 National policy is set out in the National Planning Policy Framework (NPPF). The NPPF is supported by web-based Planning Practice Guidance (PPG). I have also borne in mind the Written Ministerial Statement on Neighbourhood Planning (HCWS346) made on 12 December 2016.

4.2 The submission documents include a Basic Conditions Statement. With regard to national policy and advice, it contains a table assessing the challenges that the CaSENP addresses against the NPPF goals (Table 2.1), and a table that assesses how each policy in the NP conforms to the NPPF (Table 2.2). Both these tables address the following topics in the NPPF:

- Delivering a wide choice of high quality homes
- Supporting a prosperous rural economy
- Building a strong and competitive economy
- Promoting sustainable transport
- Supporting high quality communications infrastructure
- Requiring good design
- Promoting healthy communities
- Conserving and enhancing the natural environment

In addition, the Basic Conditions Statement makes reference to paragraphs 183-185 of the NPPF that make specific reference to the preparation of NPs.

4.3 It seems to me that the topics referred to above are sufficiently comprehensive and, for a 'light touch' examination, I do not need to look further into the policies of the NPPF. It did occur to me that the document does not mention the "advice issued by the Secretary of State" element of the Basic Condition, but since that advice relates to how the Framework should be interpreted, this does not seem to be an omission of any great importance.

4.4 The main complaint by respondents to the Regulation 16 consultation in respect to this Condition was that the NP has not met the objective to "boost significantly the supply of housing" largely, it is claimed, because the large evidence base prepared by CBC has not been shared and used and representations made have not been properly considered. It was this line of argument that initially seemed to me to be well founded, since within the NP itself and the background documentation there is nothing which suggests that there has been shared working between the Steering Group and the local planning authority. Fortunately the hearing enabled this to be robustly countered, particularly by CBC, and to be tested.

4.5 The outcome was clear that there has in fact been close working, albeit that the nature of the two parishes and the requirements of the planning authority to find major housing allocations, together with the fact that, save for the built-up areas of the two

villages the NP area is Green Belt, means that there was very little scope for the CaSENP to identify and allocate housing sites. As was pointed out by the CBC officer, what is being looked for in emerging NPs is the identification of 'windfall sites' rather than substantial allocations. The fact that this close working was unidentifiable in the document itself, or elsewhere, is a serious omission in seeking to find compliance with this Basis Condition. However, towards the close of the hearing I was able to invite the submission of text that would fill the gap in understanding. My invitation was readily acceded to with the result that I have received text that is to be inserted as a new paragraph 1.3 to the CaSENP. This new paragraph is essential in filling out this part of the background and making clear that the NP has not been prepared in a policy vacuum. I will recommend accordingly.

4.6 Since the CaSENP has been prepared in a near vacuum with regard to an extant local plan, and since the replacement Local Plan for CBC is currently in its late stages of preparation prior to submission, and has been prepared in great haste following the abandonment of an earlier draft, it is no surprise that there has been little scope in the NP for boosting the housing supply to a significant extent. It may be thought that delaying the production of the CaSENP until a new local plan is in place would have been sensible, but there is no requirement to do so and at the time of its inception it might well have been thought that a sound development plan basis would have been achieved during its formulation. It appears to me that the representations seeking the allocation of relatively large sites are more appropriately made in the context of the emerging Local Plan, and indeed I understand that this course is being followed.

4.7 Nothing suggests to me that this Basic Condition has not been met.

Contribute to the achievement of sustainable development

4.8 It is clear from the strategic objectives of the CaSENP and policies that sustainability has been at the forefront of the minds of those compiling the plan. From the NP Objectives I pick out, as examples, the creation of the Heritage Gateway, new housing to meet sustainably the needs of all age groups, facilities and services in sustainable locations, the enhancement of sports and leisure facilities, improved and safer routes reducing reliance on cars, top priority for the safety of pedestrians and support for sustainable energy. In my judgement the policies of the plan all support and encourage sustainable development.

4.9 However, in my pre-hearing note I expressed concern about elements of the supporting document "Sustainability Appraisal incorporating Strategic Environmental Assessment" that also reflected matters set out in representations. These include the intelligibility of the document, the extent to which sites have been assessed and the outcome of the assessment. In respect of intelligibility for instance, within section 14, entitled Assessment of Neighbourhood Plan Policies, there suddenly appears paragraphs 14.5 to 14.8 that deal with sites put forward for consideration as development sites. Apart from the fact that this is not in context with the section heading, it is also difficult to find.

4.10 This part of the text makes clear that in total 32 sites were put forward for consideration, although it then states that of these 4 were not put forward for development. Understandably these were excluded from further consideration. Paragraph 14.6 then refers to the remaining 26 sites – although 32 minus 4 should leave 28. But more to the point, this paragraph explains that those that were separated from the settlements of Caddington and Slip End – as defined by the Green Belt boundaries – were excluded on the basis that they would represent unsustainable locations. In total 14 sites were excluded on this basis. This seems to me to be not entirely adequate reasoning, particularly as one site within the Green Belt has gone on to be a "Site Allocation" (Policy CASE14 [subject to removal from the Green Belt through the Central Bedfordshire Local Plan process]). Furthermore, the document

entitled "Site assessment methodology & web-based consultation" ends at site CS27 although the separate "Site Assessment Matrix and Overall Assessment" document includes assessment of sites CS29 and CS30.

4.11 At the hearing it was conceded that there could be greater clarity and that minor errors had crept into the documentation. In spite of this and my initial misgivings, bearing in mind that this examination should be 'light touch' and also taking account of the points made in representations, I have concluded that the CaSENP does contribute to the achievement of sustainable development. This is because of the points made in paragraph 4.8 above, and also that this NP is very constrained in the opportunities for development in its area. This is because most of the NP area cannot be considered for development, at NP level, because of the extent of the Green Belt. In respect of the aspirations for various sites as set out in representations, the only sensible vehicle for the full and potentially successful consideration of new development in the Green Belt is through the emerging Local Plan. Although the appraisal of sites put forward might have been carried out in a clearer and perhaps more consistent manner, I am satisfied that the promoters of sites will not have been prejudiced because of the opportunities through the local plan processes of the local planning authority. To the extent that the emerging Local Plan may include proposals and allocation within the CaSENP area that are additional or contrary to elements of the NP, the Local Plan, as the most recently adopted development plan document, will take precedence.

Be in general conformity with the strategic policies in the development plan for the local area

4.12 The development plan for the area including Caddington and Slip End Parishes currently consists of the 2004 South Bedfordshire Local Plan Review (or at least the saved policies of that plan) and the Joint Minerals and Waste Local Plan: Strategic Sites and Policies (with Bedford and Luton Boroughs). Nothing before me suggests that the latter has relevance to my examination of the CaSENP.

4.13 Without exception it is acknowledged that the 2004 South Bedfordshire Local Plan Review is out of date. Furthermore, at the time of the adoption of that plan there was no requirement for 'Strategic Policies' to be identified, and they were not. It is therefore a matter of judgement as to which policies of the 2004 Plan might be described as being strategic.

4.14 Section 4 of the Basic Conditions Statement deals with general conformity with the strategic policies in the development plan. In doing so it seeks to identify those policies in the 2004 Local Plan that are relevant to this basic condition (Table 4.1). As paragraph 4.3 puts it "Any policy not identified in Table 4.1 is not considered to be relevant to the CaSENP because the CaSENP does not have any policies that directly relate to it". I raised the question of whether there might be a strategic policy to which there should be general conformity but in respect to which the policies of the NP were silent. For instance Local Plan Policy H5 deals with Providing Affordable Housing in Rural Areas. This might well be thought to be a strategic policy, especially in the context of two rural parishes, but is not listed in Table 4.1. At first sight this was surprising because of the document commissioned early in the process of preparing the NP undertaking a survey of Housing Needs. I will come back to that shortly.

4.15 Remaining with the generality of conformity with development plan strategic policies, and bearing in mind the representations made on the subject, the government's Planning Practice Guidance (PPG) deals with the situation where there is an emerging local plan. The PPG advises that a draft neighbourhood plan is not tested against the policies in an emerging local plan, although the reasoning and evidence informing the local plan process may be relevant to the consideration of the basic conditions against which a

neighbourhood plan is tested. 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 and the adopted development plan, with appropriate regard to national policy and guidance.

4.16 I have already mentioned that close working has in fact taken place (paragraphs 4.5 above) and I am now satisfied that this basic condition has been met.

4.17 However I need to deal with the issue that I mentioned in paragraph 4.14 above relating to the Housing Needs Survey Report that was delivered in August 2013, very early in the preparation of the CaSENP. This report, commissioned by the Steering Group, drew conclusions and made recommendations about the need for affordable housing, including an assessment of the needs of people with local connections, drawing attention to a 'rural exception site' as a suitable way of meeting the need, and the usefulness of market housing in supporting such development. This survey was clearly meant to inform the policies of the NP but it would appear to have been largely ignored in policy formulation. This is in spite of the fact that in the introduction to the survey it states "The survey aimed to assess the need of local people for affordable housing which could be brought forward through a Rural Exception Site development..." (and for wider market housing), which presumably was the subject of the commission.

4.18 My concerns about this apparent omission were discussed at the hearing, revealing highly pertinent information about the evolution of the NP and explaining the lack of a policy in the document. At the hearing it was agreed that additional text in the NP was desirable and I have subsequently been supplied with this: an addition to the text of paragraph 3.5 of the plan. This is a concise explanation that I am satisfied should be added and I will so recommend. In addition there is a suggested small consequential modification to paragraph 3.7 that I also recommend.

Must not breach, and must be otherwise compatible, with EU obligations, including human rights requirements

4.19 There is nothing in the representations or my reading of the CaSENP and the background documentation to suggest to me that there is any breach of EU obligations and that it is otherwise compatible with these obligations including human rights requirements.

Must not have a significant adverse effect on a 'European site' (under the Conservation of Habitats and Species Regulations 2010).

4.20 Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 refers to the Habitat Directive. The Directive requires that any plan or project likely to have a significant effect on European sites must be subject to an Appropriate Assessment. Paragraphs 2 to 5 of Schedule 2 amend the Conservation of Habitats and Species Regulations 2010 so that its provisions apply to Neighbourhood Development Orders and NPs. The Regulations state that NPs are not likely to have a significant effect on a site designated at European level for its biodiversity, however, this needs to be ascertained through a Habitat Regulations Assessment's screening process.

4.21 Appendix A to the CBC 'Statement regarding European Directives compatibility' sets out the screening assessment process undertaken. Section 5 sets out the assessment, noting that whilst there are no European sites within the area of CaSENP, distance itself is not a definitive guide. Therefore nine European sites have been identified with distances up to 80km from the boundary of the parishes. The screening outcome is set out in section 6, concluding that the potential significant effects arising from the development proposed by the CaSENP, both independently and in combination with other plans or strategies

published to date have been assessed with the conclusion that the NP is highly unlikely to affect the European sites identified in the report. As such, CaSENP does not require an Appropriate Assessment to be undertaken. Natural England has been consulted upon the report and agreed with the conclusion. The email response is attached to the report in its Appendix B.

Must comply with any other prescribed matters.

4.22 When submitted to the local planning authority (LPA), a Neighbourhood Development Plan (NDP) should be accompanied by a map or statement identifying the area to which the plan relates, a 'basic conditions statement' explaining how the basic conditions are met, and a 'consultation statement' containing details of those consulted, how they were consulted, their main issues and concerns and how these have been considered and, where relevant, addressed in the plan.

- The NP contains a map of the area to which the plan relates.
- A basic conditions statement was submitted with the NP.
- A consultation statement was submitted with the NP.

4.23 The NP must meet other legal requirements, including:

- that it is being submitted by a qualifying body (as defined by the legislation).
- that what is being proposed is a NDP as defined in the legislation.
- that the NP states the period for which it is to have effect.
- that the policies do not relate to 'excluded development'.
- that the proposed NP does not relate to more than one neighbourhood area.
- that there are no other NDPs in place within the neighbourhood area.

4.24 The requirements listed in paragraph 4.22 and 4.23 have all been met.

5 Caddington and Slip End Neighbourhood Plan Policies

5.1 There is little that I need say about the policies of CaSENP at this point in my report. Whilst there are representations making reference to the housing policies of the NP, I consider that I do not need to add to what I have already written in paragraphs 4.4 – 4.6, 4.10 – 4.11 and 4.17 – 4.18 above. Beyond this, only one of the policies has been the subject of representations suggesting a need for changes, with only relatively minor matters raised: this is policy CASE13.

5.2 Sport England is concerned about Policy CASE13 in as much as the final criterion of the policy, together with paragraph 9.11 of the supporting text, advises that if a viability assessment demonstrates that it is not possible to deliver all the requirements of the policy then it would be expected that a new village hall and associated facilities would be the priority. This concern is set against deficiencies in playing pitch provision in Caddington and the wider Central Bedfordshire area, and the advice in NPPF paragraph 74. The other concern is by Historic England which suggests minor changes to the wording of CASE13, drawing attention to part of the site being in the Caddington Conservation Area.

5.3 Dealing first with the playing pitch point, in my opinion it is not inappropriate to mention viability concerns in a policy where it can be seen in advance that the portfolio of requirements may place a strain on the viability of the development. In such cases a planning judgement has to be made at the point where planning permission is sought. It is reasonable for the NP to set out the local priority that will have to be weighed by the local planning authority when considering the application. As for the points made by Historic England, there is a legislative requirement for the local planning authority to pay special

attention to the desirability of preserving or enhancing the character or appearance of a conservation area when considering a development proposal, and therefore this does not need to be repeated in the policy. However, one of the suggested post-hearing modifications to the NP made by CBC/CaSENP is a new sentence in paragraph 1.31 of the NP referring to the designated conservation area and also making reference to listed buildings and a Scheduled Ancient Monument. I will make a recommendation to put this into effect.

5.4 There are also concerns about some matters not covered in the policies. The CBC Flood Team commented concerning flood risk, whilst Thames Water suggests the need for a policy on water and waste water infrastructure. The flood risk point has again been picked up in the post-hearing suggestions. The suggestion is that there should be a new paragraph 1.32 referring to flooding in the area and that any new development will be expected to take account of the report on flood risk which it mentions. As to the points made by Thames Water, I note that paragraph 162 of the NPPF is referred to: the policy here is clearly directed at local planning authorities, and it is at the level of the Local Plan that I consider general guidance and policy about infrastructure and utilities should be dealt with. I see no need for the addition suggested to be added to the NP.

6 Other matters

6.1 In my pre-hearing note and during the discussion at the hearing I drew attention to a number of incorrect statements and typing errors that were then briefly discussed. Again these are matters that have been picked up in the post-hearing response. The most important of these are statements in the NP that assert or suggest that the whole of the two parishes are covered by the Green Belt notation. This is not true as the built up areas of the two villages of Caddington and Slip End are excluded from the Green Belt. As a result there are suggested modifications, first as a new paragraph 1.4 to be inserted that also allows for additional text to explain that the range of potential policies and realistic alternatives has been inhibited by the extent of the Green Belt. The second is an addition to paragraph 1.7. I will recommend that these modifications are put in place, except that there is a small error here. The modification that makes sense and as I should prefer it is for the penultimate sentence of paragraph 1.7 to read: "The area has a rural feel and is within the South Bedfordshire Green Belt, apart from the built up areas of Caddington and Slip End villages". The third modification is to paragraph 1.36 that also makes clear that the exceptions to Green Belt coverage in the NP area are the villages of Caddington and Slip End.

7 Overall Conclusions and Formal Recommendation

7.1 I have concluded that, provided that the recommendations that I refer to above are followed, as detailed in Appendix A, the CaSENP meets the basic conditions. I have also concluded that the CaSENP meets other prescribed matters and other legal requirements that I have dealt with in paragraphs 4.22 to 4.24 above.

7.2 I therefore recommend that the CaSENP, as modified, should proceed to a referendum.

7.3 There is no evidence to suggest that the area of the referendum should be anything other than the Neighbourhood Plan Area, as defined by the map on page 2 of the CaSENP.

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17 April 2018

Appendix A:

The Examiner's recommended modifications to the CaSENP

Examiner's report Paragraph	CaSENP reference	Recommendation
4.5	New paragraph 1.3	Insert new paragraph 1.3: "Throughout the whole process of producing the Neighbourhood Plan, the two parishes have worked closely with Central Bedfordshire Council, both elected Members and officers. This has included attendance at Steering Group Meetings, help and advice during the assessment of sites, advising on the European Directives requirements and close liaison in the drafting of the text and policies. The planning policy background has been changing rapidly throughout this period and the complexities of aligning CaSENP with the emerging Development Strategy and then the new Central Bedfordshire Local Plan have been a matter of close liaison. Much of the evidence and reasoning behind the Submission CBC Local Plan (published January 2018) did not emerge until after the Submission Version of the CaSENP had been completed. However, it is clear that the CaSENP is in general conformity with the strategic policies of the emerging CBC Local Plan as well as the existing South Bedfordshire Local Plan (which remains the statutory development plan for the area until superseded by the adopted CBC Local Plan)."
6.1	New paragraph 1.4	Insert new paragraph 1.4: "The majority of the two parishes lie within the Green Belt, the settlements of Caddington and Slip End are excluded. This means that the CaSENP has been constrained in allocating sites for development, the National Planning Policy Framework (NPPF) 2012 only allows Local Planning Authorities (i.e. CBC) to alter Green Belt boundaries. As a result of this constraint, and given the absence of an up-to-date Local Plan, the Strategic Environmental Assessment (SEA) has also been inhibited in the range of potential policies and the realistic alternatives that can be assessed. This has potentially curtailed the iterative process. However, the SEA is considered to be robust an appropriate and satisfies the European Directive requirements."
Not required	Where new paragraphs inserted	Renumber following paragraphs.
5.3	Paragraph 1.31	Add new sentence at end: "Caddington has a designated Conservation Area and there are 5 listed buildings and a Scheduled Ancient Monument in the area. There are also Archaeological Notification Areas within the parishes."
5.4	New paragraph 1.32	Insert new paragraph: "The area can be subject to flooding which can be very

		disruptive at times of poor weather. Any new development will be expected to refer to this report on flood risk which is based on detailed hydraulic modelling of the area: http://www.centralbedfordshire.gov.uk/planning/flooding/downloads.aspx "
6.1	Paragraph 1.36	Replace 'Caddington is' with "The parishes are". and Insert after 'Green Belt' "except for the built up areas of Caddington and Slip End"
6.1	Paragraph 1.7	Replace the penultimate sentence this with: "The area has a rural feel and is within the South Bedfordshire Green Belt, apart from the built up areas of Caddington and Slip End villages."
4.18	Paragraph 3.5	Add at the end of the paragraph: "Affordable housing was also raised as an issue in the Survey which reflected local concern as mentioned in Paragraph 3.3. However, during the period of preparation of the CaSENP, a local lettings policy has been implemented by the CaSE Community Trust which is providing access to affordable housing for local people. Accordingly there is no need for a policy relating to this in the CaSENP."
4.18	Paragraph 3.7	Replace "the Neighbourhood Plan aims" with "Rural Exception Schemes and allocations outside the remit of the CaSENP aim to"
Not required	Various minor points	Make the various corrections, clarifications and up-dates set out in the Post-Hearing Response Paper not mentioned above in paragraph 1.16, subheading before paragraph 1.40, in paragraph 1.46, in policy CASE1, in paragraph 5.5, in policy CASE8, in paragraph 6.2, in policies Case11 and CASE14, in Figures A6 and A7, in Key on Policies Maps and correct other minor typing errors, etc.

APPENDIX B

The post-Hearing Response Paper

Response to Examiners request for minor alterations/clarifications to Caddington and Slip End Neighbourhood Plan – Post-Hearing (15th March 2018)

CaSENP paragraph reference	Changes	Reason for change
New paragraph 1.3 to be inserted	Throughout the whole process of producing the Neighbourhood Plan, the two parishes have worked closely with Central Bedfordshire Council, both elected Members and officers. This has included attendance at Steering Group Meetings, help and advice during the assessment of sites, advising on the European Directives requirements and close liaison in the drafting of the text and policies. The planning policy background has been changing rapidly throughout this period and the complexities of aligning CaSENP with the emerging Development Strategy and then the new Central Bedfordshire Local Plan have been a matter of close liaison. Much of the evidence and reasoning behind the Submission CBC Local Plan (published January 2018) did not emerge until after the Submission Version of the CaSENP had been completed. However, it is clear that the CaSENP is in general conformity with the strategic policies of the emerging CBC Local Plan as well as the existing South Bedfordshire Local Plan (which remains the statutory development plan for the area until superseded by the adopted CBC Local Plan).	Clarification and description of working together
New Paragraph 1.4 to be inserted (following paragraphs to be renumbered)	The majority of the two parishes lie within the Green Belt, the settlements of Caddington and Slip End are excluded. This means that the CaSENP has been constrained in allocating sites for development, the National Planning Policy Framework (NPPF) 2012 only allows Local Planning Authorities (i.e. CBC) to alter Green Belt boundaries. As a result of this constraint, and given the absence of an up-to-date Local Plan, the Strategic Environmental Assessment (SEA) has also been inhibited in the range of potential policies and the realistic alternatives that can be assessed. This has potentially curtailed the iterative process. However, the SEA is considered to be robust an appropriate and satisfies the European Directive requirements.	Clarification
Para 1.7	Replace `is wholly washed over by' with `within (apart from the built up areas of Caddington and Slip End villages)'	Correction

Para 1.16	Replace '4' with '6'	To bring NP up to date
Para 1.31	Add new sentence at end 'Caddington has a designated Conservation Area and there are 5 listed buildings and a Scheduled Ancient Monument in the area. There are also Archaeological Notification Areas within the parishes.	Addition following representation by Heritage England
New Para 1.32, renumber following paragraphs	The area can be subject to flooding which can be very disruptive at times of poor weather. Any new development will be expected to refer to this report on flood risk which is based on detailed hydraulic modelling of the area http://www.centralbedfordshire.gov.uk/planning/flooding/downloads.aspx	Addition following representation from CBC's Sustainable Drainage Engineer
Para 1.36	Replace 'Caddington' with 'The parishes'. Insert after 'Green Belt' 'except for the built up areas of Caddington and Slip End'	Correction
Subheading before Para 1.40	Amend subheading to 'Local Plan policy and related planning issues'	Clarification
Para 1.46	After 'Neighbourhood Plan area' add 'at Grove Road/Markyate Road in Slip End'	Clarification
Para 3.5	Affordable housing was also raised as an issue in the Survey which reflected local concern as mentioned in Paragraph 3.3. However, during the period of preparation of the CaSENP, a local lettings policy has been implemented by the CaSE Community Trust which is providing access to affordable housing for local people. Accordingly there is no need for a policy relating to this in the CaSENP.	Clarification and to bring NP up to date
Para 3.7	Replace ' the Neighbourhood Plan aims' with 'Rural Exceptions Schemes and allocations outside the remit of the CaSENP aim to'	Clarification
Policy CASE1 second paragraph	Replace 'CASE1' with 'CASE13'	Correction
Para 5.5 5 th bullet point	Add at end 'and two pitches'.	Clarification
Policy CASE8	Remove the word 'all' from the beginning of the policy	To clarify that it may not be possible for all developments to contribute wither through S106, or if CIL does happen in the future in CBC
Para 6.2	Delete 'once underway'	To bring NP up to date
Policy CASE11	Move last sentence 'Proposals for.....criteria' to after the third bullet point in the first part of the policy	Correction
Policy CASE14	Delete 'residential development on land to the rear of Slip End School'	Correction

Figure A6	Move title from previous page to just above the chart	Correction
Figure A7	Delete 'Chart title'	Correction
Key on Policies Maps	Replace 'Residential' with 'Policy proposals'	Correction
Other minor typing errors and unintended emboldening or underlining of text	To be corrected for final version of CaSENP	Correction