

Staploe Parish Neighbourhood Plan Regulation 14 Consultation

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
General Comments	Resident 1	I am writing to express my support for the proposed Staploe and Duloe Neighbourhood Plan. I think it is important that parishioners have a say in future proposals which might affect the parish and am in full support of the plan.	Noted	No
General Comments	Resident 2	We agree with the plan, but question the field behind and to the side of 28-32 Duloe, as we can't see it on the plan.	Thank you for your comments. No one proposed making that field a Green Space. Someone did propose the field opposite Manor Farm and the one behind Manor Farm (not the one you are referring to but owned by the same people). The two fields were assessed and were recommended as suitable for designation (see the Green Spaces report sites 20 and 21). However, the landowner did not want to make these green spaces and we decided not to attempt to designate green spaces against the will of the landowners because we have been informed that an inspector was very unlikely to grant it against a landowners wishes unless there were exceptional reasons to do so - and we didn't think there were any exceptional reasons with these fields.	No
General Comments	Residents 3 & 4	I'm emailing to say that [my partner] and I have discussed this and I am also happy to support the Plan. Thank you to all the team for their hard work on the project.		No
General Comments	Resident 5	Just to confirm, I support what is proposed in the Parrish neighbourhood plan		No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
General Comments	Resident 6	I agree with the contents of the parish neighbourhood plan.		No
General Comments	National Grid Electricity Transmission (NGET)	Advised us to contact National Grid Electricity Distribution and National Gas separately. This was done on 9th July 2025. NGET's full response is available here: https://staploe-pc.gov.uk/wp-content/uploads/simple-file-list/Neighbourhood-Plan/Staploe-NDP-NGET-National-Grid-Response.pdf	The consultation documents have been sent to National Gas and UK Power Networks (who cover our area instead of National Grid Electricity Distribution (NGED) on 9 th July 2025	No
General Comments on NP	Environment Agency	Additional Advice We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and Environment Agency Icen House Cobham Road, Ipswich, IP3 9JD. Customer services line: 03708 506 506 www.gov.uk/environment-agency Cont/d.. ideas on incorporating the environment into plans. This is available at: How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning	We have read the joint guidance on incorporating the environment into plans. We believe that our initial questionnaire asked residents what they liked about living in the parish. Our green Infrastructure consultation and resulting plan and our design codes guidance incorporate the principals identified in the joint guidance referred to by the Environment Agency. We have identified and described both the designated and non-designated heritage assets, designated green spaces, identified key views and prepared a list of aspirations for green infrastructure.	No
General comments on NP	Historic England	We welcome the production of the neighbourhood plan, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time. We refer you to our 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/. For any specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Bedford Borough Council.	We have consulted the HER at Bedford Borough Council. We have identified non-designated assets. There is no "Heritage at Risk" identified in the parish. No sites are allocated for development in this plan.	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
General comments on NP	Bedford Borough Council	Page numbering is not consistent throughout the documents	The page numbering is incorrect from p22 onwards	Yes. Page numbering will be corrected
General Comments on NP	Natural England	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 and to the following information. Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species . Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice. We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary. Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental	No sites are allocated for development.	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
		report stages. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.		
General comments on NP	Health and Safety Executive	HSE is not a statutory consultee for local and neighbourhood plans. However, HSE has provided LPAs with access to its LUP Web App <a href="https://pa.hsl.gov.uk/<https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fpa.hsl.gov.uk%2f&c=E,1,x33gHCKw4WesD9fCqM53iv_dhTLdX-jEig_z6Kjbpc5OCn_qJ6YhnkynFbpSLDfmzfVBC1q-R_UPZd-lyPbwjW2II0E9AbqD9Y4UD_JhGzZGMz_vgkfy&typo=1>">https://pa.hsl.gov.uk/<https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fpa.hsl.gov.uk%2f&c=E,1,x33gHCKw4WesD9fCqM53iv_dhTLdX-jEig_z6Kjbpc5OCn_qJ6YhnkynFbpSLDfmzfVBC1q-R_UPZd-lyPbwjW2II0E9AbqD9Y4UD_JhGzZGMz_vgkfy&typo=1> and downloadable GIS consultation zones. These tools alongside HSE's published methodology (<a href="http://www.hse.gov.uk/landuseplanning/<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.hse.gov.uk%2fanduseplanning%2f&c=E,1,lm6lpGS40SeipesS0L3m6dOtssjTHqojjWWIzZDaiQ2LTzrHo2vtiU9rgvI77IQ0bAGQKRv1DVQbNQjqKJwbCfyuYGEExZNQjysecSOgzFRbUETFa0Q,,&typo=1>">http://www.hse.gov.uk/landuseplanning/<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.hse.gov.uk%2fanduseplanning%2f&c=E,1,lm6lpGS40SeipesS0L3m6dOtssjTHqojjWWIzZDaiQ2LTzrHo2vtiU9rgvI77IQ0bAGQKRv1DVQbNQjqKJwbCfyuYGEExZNQjysecSOgzFRbUETFa0Q,,&typo=1>) can assist in ensuring that land allocations do not conflict with major hazard sites and pipelines, licenced explosives sites and nuclear installations.	Bedford Borough Council said this will not be a problem as we are not building on any sites.	No
General	Canal and river trust	The plan area is not within close proximity to our network and therefore the Canal & River Trust have no comments to make.	Noted	No
General	Central Bedfordshire Council	Did not want to make any representations	Noted	No
General comments on NP	UK Civil aviation authority	Consultation not required for strategic planning unless structures over 90m or the plan directly affects an airport.	Our plans will not build anything and will not affect an airport.	No
General comments on NP	GTC	Please can you first complete a GTC Plant Enquiry to identify if this affects our assets, this can be obtained via https://pe.gtc-uk.co.uk/Plant_Enquiry < https://pe.gtc-uk.co.uk/Plant_Enquiry > . Once you have confirmation that your works will have an impact on a GTC network, please submit your diversion request direct to us at Network_Variations@gtc-uk.co.uk < mailto:Network_Variations@gtc-uk.co.uk > , including the following: * Description and markup of planned works * GTC Plant Enquiry reference and/or letter from GTC confirming networks affected	We are not building anything so there will be no need to move any assets.	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
General comments on NP	National Grid	This is not covered by National Grid	Noted	No
Aims & Vision	Bedford Borough Council	Page 15 – it is suggested to reword the aim for the Historic Environment to ‘To protect and conserve, all structures of historical importance and their environs, and all archaeological remains’	Agree	Yes – amend as suggested
Objectives				
Policy RC1 Strategic gaps	Anglian Water	Policy RC1 seeks to ensure development does not result in the physical or visual coalescence of settlements and would not undermine the separate character, appearance and/or identity of settlements. This indicates areas of undeveloped land between Duloe and Eaton Socon, proposed as a Strategic Gap. This area is identified on the Policies Map and Figure 2 but would benefit from being more defined and with accurate notation to show how far north and south of Duloe Lane it extends i.e. showing as a hatched area with boundaries. It is not possible to ascertain the extent of the Strategic Gap, which may include Anglian Water’s Duloe Water Recycling Centre (WRC) and access road. See extracts of the maps at the end of this response which show the location of this facility and current Strategic Gap notation. This designation could potentially place an unnecessary policy burden which could limit our ability to bring forward planned investment/ engineering works needed to serve the local community at this facility. Some of these works may be necessary operational works and deemed as ‘permitted development’, but others may require planning permission. To ensure that we can undertake any future necessary works/ enhancement of this asset which forms critical infrastructure for the Parish, we therefore object to its inclusion and request that this area is removed from the proposed designation. 3 We ask the neighbourhood plan group to clarify the position on this matter with us. I should be grateful if you could please contact me directly to discuss.	The Clerk has e-mailed Anglian Water on 9 th July. The use of an arrow instead of a hatched area is deliberate to align with the Local Plan approach. Text wording to be revised to reference any essential infrastructure works for statutory undertakers.	Yes
Policy HE1 Protect & enhance local heritage assets	Bedford Borough Council	Policy HE1 - The heritage assets identified in the policy are undoubtedly worthy of mention but are there any other assets? The policy would be more robust if the Council’s Historic Environment Record was consulted for non-designated heritage assets. What about the former Gospel Hall in Staploe, or the Wesleyan Chapel in Honeydon for example? The Council have selection criteria at para.133 of the draft Local Plan 2040 and this selection criteria may aid you in selecting other assets. It is also suggested to add in the word ‘non-designated’ to replace the word ‘local’ in the first sentence of the policy.	Noted. We have consulted the HER and noted the Bedford Borough Council criteria of age and integrity, rarity, architectural interest, archaeological interest, artistic Interest, historic interest, designed or historic landscapes, landmark value, group value.	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
			We do not wish to include the chapels at this stage.	
Policy HE2 Protect & enhance understanding of archaeology	Bedford Borough Council	Paragraph 9.5 – it is suggested that this paragraph could expand on the historical/archaeological background of the parish. Paragraph 9.6 – it would be useful to include a summary of the archaeological potential of Staploe Parish. You can consult the Bedford Historic Environment Record for information on this. Policy HE2 – last paragraph – what is a non-designated archaeological site?	We have already described the historical / archaeological background using the Bedford HER. This is clear in paragraph 9.6/7, it does not need to be explained in the policy as well. A non-designated site may refer to an undiscovered archaeological site.	No
Policy NE2 Biodiversity	Environment Agency	Biodiversity Net Gain We note the Biodiversity Policies within the plan, however without the inclusion of a watercourse metric for windfall developments. On 12 February 2024, Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). This means that unless exempt, Developers must deliver a net gain in biodiversity of at least 10%. Consequently, a development will result in more or better-quality natural habitat than there was before End 2 development. For any windfall developments where development falls within 10m of a watercourse, a watercourse metric should be applied to the assessment.	Noted Add: “ For any windfall developments where development falls within 10m of a watercourse, a watercourse metric should be applied to the assessment.”	Yes
Policy NE2 Biodiversity	Bedford Borough Council	Policy NE2 – First line, ‘where appropriate’ all development, unless it is exempt, must provide a minimum of 10% BNG. Off-site gains do not have to be in the parish as there is currently no habitat bank in Staploe Parish and there is no statutory requirement for this to occur even in the borough. Fourth paragraph – what is meant by ‘locally sourced’? Is this in England or a particular region?	The preceding paragraphs note that some development is exempt, there is no need to repeat this in the policy. We would like the biodiversity gain to be in our parish as a preference. We are aware it is not mandatory. Use of native species, locally sourced where possible. Ideally within the region ie. East of England where possible, but this would depend upon availability and species	No
Policy NE2 Biodiversity	Natural England	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.	No sites are allocated for development.	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
		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 and to the following information. Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species . Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice. We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary. Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment s required, Natural England must be consulted at the scoping and environmental report stages. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.		
Policy NE2 Biodiversity	National Grid Electricity Transmission (NGET)	Object until the following statement is included: "Policy NE2: Biodiversity Proposals will include a strategy for responding to the National Grid Overhead Cable Route present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the master	This would be required at planning application stage and not necessary in the policy	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
		planning stage and how the impact of the assets has been reduced through good design”.		
Policy NE2 Biodiversity	Anglian Water	Anglian Water supports the policy of prioritising the delivery of biodiversity net gains within the neighbourhood planning area to support habitat recovery and enhancements within existing green and blue infrastructure. We also support opportunities to maximise green infrastructure connectivity, including through opportunities to minimise surface water run-off from existing urban areas through the creation of rain gardens, for example. As the neighbourhood plan progresses, there may also be benefit in referencing the emerging Local Nature Recovery Strategy (LNRS) for Bedfordshire as this will identify priority actions for nature and map specific areas for improving habitats for nature recovery. Bedfordshire Naturally – The Bedfordshire LNP covers the geographical area of Bedfordshire, including the Luton, Bedford and Central Bedfordshire unitary councils. Anglian Water has made a corporate commitment to deliver a biodiversity net gain of 10% against the measured losses of habitats on all AW-owned land.	Noted. On checking the LNRS for Bedfordshire, guidance for Parish Councils is not available yet. The Parish Clerk has suggested to the author that the Bedfordshire Natural Capital Assessment report should include the Roadside Nature Reserves which are so prolific in our parish.	No
Policy NE2 Biodiversity	Resident 7	I can confirm that I support the Staploe Parish Neighbourhood Plan. As an experienced falconer, preserving our existing huge biodiversity in the Parish is important to me. This Plan covers this topic extremely well.		No
PolicySD 2 High quality design	Bedfordshire Police	Not sure if you can add the observations that follow but it would be appreciated if the below can be adapted in some way to fit within the draft NDP, perhaps under 9. SUSTAINABLE DEVELOPMENT. National Model Design Code (part 2: guidance notes) page 61, section P.3.i: “Neighbourhoods need to be designed to make all people feel safe and to reduce the incidence of crime in accordance with the recommendations of Secured by Design which includes guidance for housing, commercial space, schools, hospitals and sheltered accommodation. Support and advice is available from the police through a network of Designing Out Crime Officers (DOCOs) across the UK. Secured by Design advice incorporates proven crime prevention techniques and measures into the layout and design of places and spaces.” SBD is a long-running flagship initiative of the National Police Chiefs’ Council. Its objective is to design out crime during the planning process. It is a highly respected standard in the sector, supported by numerous public bodies and professional organisations. SBD is therefore a vital guidance resource for planners and developers. SBD is available online, regularly updated and consequently, there is no danger of it ceasing to exist during the lifetime of the Local Plan. It should be noted	Noted. Many of the principles in this design code are more applicable to urban and suburban environments than to rural hamlets such as ours.	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
		that SBD can be applied to all sizes of new build developments, (residential, community, educational, leisure and commercial), self-builds and refurbishments. The Bedford Borough Local Plan 2040 Draft supports the promotion of Secured By Design (SBD). This will ensure that developers properly consider the measures involved in designing out crime to create and maintain a sustainable community in accordance with the National Model Design Code, the National Planning Policy Framework, Bedford Borough's Sustainable Community Strategy, and Section 17 of the Crime & Disorder Act 1998. Bedfordshire Police will therefore be encouraging all local neighbourhood plans to incorporate the Secured By Design principles and, where applicable, to apply for the SBD Developers Award. Bedfordshire Police have 2 Designing Out Crime Officers available to provide advice and guidance for developers and we are contactable at doco@beds.police.uk <mailto:doco@beds.police.uk> . Beds Police DOCOs are also consultants on planning applications and our responses are primarily concerned with the prevention of crime and disorder within the built environment, using the principles of CPTED (crime prevention through environmental design). Advice and guidance provided by Beds Police DOCOs is influenced by the following: National Planning Policy Framework (December 2024) Section 8 Para 96-b: Planning policies and decisions should aim to achieve healthy, inclusive and safe places which "are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas." National Planning Policy Framework (December 2024) Section 12 Para 135-f: Planning policies and decisions should ensure that developments "create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience".		
Policy SD2 High quality design	Anglian Water	We suggest that the criteria listed under this policy is made clearer that they would all apply to new development by inserting "and" at the end of bullet point 7 and before bullet point 8. For bullet point 8 parking areas – this could specify permeable material/ surfaces to ensure adequate drainage, to align with the sustainable drainage requirements.	Include these amendments	Yes

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
Policy SD2 High quality design	Bedford Borough Council	SD2 – where is the evidence for 2.5 storey dwellings?	Falling Water House and Prescott are 2.5 storeys. There are no 3 storey buildings in the parish. The evidence is in the design codes. “2.3 The roofline within the parish generally has a maximum height of 2.5 stories (two stories, but with three levels of living area; refer to Figure 25 for an example). Development must not go above this height so as to preserve the roofline as seen from the surrounding landscape”	No
Policy SD4 Water management & efficiency	Environment Agency	We aim to reduce flood risk, while protecting and enhancing the water environment. Flood Risk The Draft Neighbourhood Plan includes areas which are located in Flood Zone 2 and 3. In accordance with the National Planning Policy Framework (NPPF), we remind you that the Sequential Test and/or Exception Test for any windfall development to ensure development is directed to the areas of lowest flood risk taking climate change into account. The application of the Sequential Test should be informed by the Local Planning Authority’s Strategic Flood Risk Assessment (SFRA). The Local Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites and sustainable drainage measures can complement other objectives such as enhancing green spaces.	Bedford Borough Council sent us the following response about surface water flood risk: “We have not completed a Surface Water Management Plan, however we did commission a SFRA (strategic flood risk assessment) which deals with surface water flooding and provides general advice, along with the mapping which shows which areas are susceptible. The SFRA is on our website here – https://www.bedford.gov.uk/planning-and-building-control/planning-policy/technical-reports <https://www.bedford.gov.uk/planning-and-building-control/planning-policy/technical-reports> We also have the SuDS SPD which provides guidance on sustainable drainage but we don’t have a surface water management plan. This is here - https://www.bedford.gov.uk/planning	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
			-and-building-control/planning-policy/other-planning-policy-documents/sustainable-drainage <https://www.bedford.gov.uk/planning-and-building-control/planning-policy/other-planning-policy-documents/sustainable-drainage> If you need any further information, our flood risk officers may be able to help.” The surface water management plan does not mention any particular issues in our parish. Water management is addressed in policy SD4 of our plan and paragraphs 10.23-10.26	
Policy SD4 Water management & efficiency	Anglian Water	Summary: it is important for developers to engage with Anglian Water before applying for planning permission The complete response from Anglian Water is available here: Anglian-Water-response-30-05-25.pdf	Add the following statement: “Pre application engagement with Anglian Water on water supply and wastewater and network infrastructure requirements is required. The Neighbourhood Area is served by small water recycling centres (referred to as Descriptive Works). Locations with descriptive works are unsustainable for any form of growth that requires a connection to Anglian Water’s network, unless proposals are supported by flow data for a one-year period to demonstrate there is headroom available to accommodate the proposed growth. Alternatively, development may be served by alternative/ private wastewater treatment facilities. Please find the following link to Anglian Water’s policy position statement on Water Recycling Centres with	Yes

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
			Descriptive Permits descriptive-works-position-statement-march-2025.pdf Any developers should engage in early discussions with Anglian Water's pre development team Developing (anglianwater.co.uk) .	
Policy SD4 Water management & efficiency	Anglian Water	As a general observation, the policy covers a number of drainage and flood risk and water management matters. This could be simplified by perhaps splitting the policy to provide better clarity of the policy requirements. There are also existing strategic planning policies in place, for example Bedford Borough Local Plan Policy 50S – Water Resources; Policy 92 - Flood Risk; and Policy 93 - Sustainable drainage systems (SuDS), so it may not be necessary to repeat elements of these policies. Other more detailed comments are made as follows: Sustainable drainage Anglian Water notes the neighbourhood plan refers to flooding concerns within the area and is supportive of measures to address this, including surface water run-off. The Design Guidance 4 and Codes document also offer some practical advice on sustainable drainage under 04.SD3 SuDS and surface water management. Anglian Water is supportive of this policy approach, including the preference for this to be managed using SuDS and requiring permeable surfaces for new areas of hardstanding within developments to comply with the drainage hierarchy. Such measures help to avoid surface water run-off from entering our foul drainage network, and connections to a surface water sewer should only be considered where all other options are demonstrated to be impracticable. Any requirements for a surface water connection to our surface water sewer network will require the developer to fund the cost of modelling and any upgrades required to accept the flows from the development. Anglian Water encourages the use of nature-based solutions for SuDS wherever possible, including retrofitting SuDS to existing urban areas to enhance amenity and biodiversity within the neighbourhood plan area and contribute to green and blue infrastructure. It has been the intention of Government to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England. However, we welcome the policy approach to ensure SuDS measures are incorporated within new developments, until such time these measures are in place. Policy SD4 Part 3, should clarify what the source/ requirements of Bedford Borough Council are in this criterion, as it is not clear what it is referring to - "New developments must incorporate Sustainable Urban Drainage Systems (SUDS) to reduce the runoff of surface water in line with the requirements of Bedford Borough Council." Is this	Noted, however, the policy does not need to be more detailed, given that water issues are covered at national, local plan policy levels and in Building Regulations.	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
		Local Plan Policy 93? Water resources Anglian Water has a statutory duty to supply water for domestic purposes only. This means we are legally obliged to supply water to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers). Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes. Anglian Water's water resources management plan (WRMP) for 2025-2050 identifies key challenges of population growth, climate change, and the need to protect sensitive environments by reducing abstraction. Managing the demand for water is therefore an important aspect of maintaining future supplies. The neighbourhood plan area is located within the Ruthamford South Water Resources Zone (WRZ). See Water resources management plan (anglianwater.co.uk) 5 To help protect the environment, the EA is reviewing abstraction licences and reducing the amount of water that businesses including Anglian Water can abstract from the environment. As a result, the gap between the demand for water and our supply (aka headroom) has shrunk. The current situation is reducing our ability to be flexible with new requests to supply non domestic connections which were not planned for in the WRMP. However, where our supplies allow, we will endeavour to help businesses in whatever way we can to meet their needs and continue to serve the communities and economies they support. To respond to both this challenge, and a growing population, Anglian Water is building a new strategic pipeline to move water around our region. We have also developed plans to build two new reservoirs to increase water supply. These solutions will take time to deliver, and so it is more crucial than ever that all homes and businesses are water efficient, to reduce the overall demand for water, to meet government targets and to ensure there is enough water to go around. For water supply for non-household use*, Anglian Water now has a threshold of 20m3 a day for consideration of whether meeting that commercial/ industrial request could jeopardise domestic supplies for households. This is due to pressure on water supplies because of abstraction reduction, climate change and a fast-growing population. As a result, the gap between the demand for water and our supply (headroom) has shrunk. Prospective applicants are advised to contact Anglian Water at planningliaison@anglianwater.co.uk to avoid situations where water intensive demand projects progress to site acquisition, design or planning applications		

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
		without establishing that a water supply and wastewater solution is feasible. (*Water supply for toilets and welfare facilities, as well as firefighting fall with the domestic definition.) As a region identified as seriously water stressed, we encourage measures to improve water efficiency in developments. This can be achieved by a fixtures and fittings approach, including through rainwater/ storm water, harvesting and reuse, and greywater recycling. Such measures to improve water efficiency standards and opportunities for water reuse and recycling also reduces the volume of wastewater needing to be treated by our water recycling centres. This will help to reduce customer bills (including for other energy bills) as well as reduce carbon emissions in the supply and recycling of water. Given the proposed national focus on water efficiency, Anglian Water encourages local plans and neighbourhood plans to cover this issue through a policy-based approach. Anglian Water has produced a protocol 'Shared Standards for Water Efficiency' with other partners (the EA, Natural England and Cambridge Water) on the imperative for development plan policies to achieve tighter water efficiency standards than the optional standard of 110 litres per person per day (l/p/d) for new homes. This position is reinforced by the direction taken by the Government Department DEFRA which supports the need to improve water efficiency Plan for Water: our integrated plan for delivering clean and plentiful water - GOV.UK (www.gov.uk) and the Government's Environment Improvement Plan which sets ten actions in the Roadmap to Water Efficiency in new 6 developments, including consideration of a new standard for new homes in England of 100 litres per person per day where there is a clear local need, such as in areas of serious water stress. It has recently been announced by Government that a review of the Water Efficiency Standard(s) within the Building Regulations 2010 (Part G2 of the Approved Documents) will be consulted shortly. Anglian Water welcomes inclusion in the supporting design guidance and codes document of the need to use resources in a more efficient and sustainable manner and what this can entail. It is also appropriate that the neighbourhood plan include details in its policies to help shape the design of development in the area by promoting water efficiency. It is requested that Policy SD4 Part 4 "All developments must be designed taking into account best practice in water efficiency, such as water harvesting and storage features." and Para. 10.26 in the supporting text also refer to fixtures and fittings approach as a way of making water efficiencies. This would also then reflect the coverage in the design codes guidance (Figure 46). Anglian Water suggests that further details and justification could be included within the neighbourhood plan and would be helpful in order to promote water efficiency. We request the neighbourhood plan seeks a high		

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
		standard of water efficiency for new developments for the reasons set out above. This should include positive features of water efficient fixtures and fittings, and through rainwater/storm water harvesting and reuse, and greywater recycling. In addition, if water efficiency measures are promoted, this will help reduce the amount of foul drainage from developments and lessen any pressure on water recycling centres. The Bedford Borough Local Plan 2030 provides useful context under Policy 52 - Water Demand and is proposed to be a 'saved' policy in the review Local Plan (2040). The complete response from Anglian Water is available here: Anglian-Water-response-30-05-25.pdf		
Policy SD4 Water management & efficiency	Bedford Borough Council	SD4 – Fourth paragraph – planning cannot enforce water fittings and appliances, so this paragraph is not necessary. Building Regulations also cover water efficiency. The last sentence is not necessary as not all development in a flood zone will require mitigation.	The policy covers these issues in general terms as part of the requirement for sustainable building.	No
Policy C2 Local green spaces	Bedford Borough Council	Policy C2 – In the last paragraph, what is meant by special circumstances? It is suggested that reference to Green Belt is removed as there is no Green Belt in Bedford Borough. It should be made clearer about what is considered to be 'inappropriate development' and 'very special circumstances' as this needs to be defined.	Our plan says: "Proposed development within the Local Green Spaces will be treated consistently with those for the Green Belt and development should not be approved except in very special circumstances. Inappropriate development will be resisted to protect their special character and contribution to the Parish." 'Very special circumstances' is wording enshrined in case law for development in the Green Belt. The whole point of LGS designation is that it infers a level of protection as strict as national Green Belt policy, whether or not the Borough has any Green Belt. Para 108 of the NPPF says that 'Policies and decisions for managing development	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
			within a Local Green Space should be consistent with national policy for Green Belts set out in chapter 13 of this Framework'	
Policy C2 Local green spaces	Sport England	Thank you for consulting Sport England on the above neighbourhood plan. Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 103 and 104. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy> Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications> Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 104 of the NPPF, this takes the	NPPF para 103 refers to access to sports facilities. We will be securing the future of the playing field by designating it as green space. Bedford Borough Council's Playing Pitch Strategy does not list Duloe Playing Field but it does recommend on p56 that "For local authority and parish council sites, consideration should be given, on a site-by-site basis, to the feasibility of a club taking on a long-term lease (if not already present), in order that external funding can be sought. Such sites will require some level of investment, either to the outdoor sport facilities or ancillary facilities, and is it anticipated that one of the conditions of offering a hire/lease is that the Club would be in a position to source external funding to improve/extend the provision." Duloe Playing Field is a rural field and a valued community resource for dog walking, and informal recreation as well as football. The Parish Council will retain the current management arrangements	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
		form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance <http://www.sportengland.org/planningtoolsandguidance> If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/> Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.	No new development is planned in this plan and the existing playing field has spare capacity. NPPF para 104 refers to protection and enhancement of rights of way. See Policy T1.	

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
		In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved. NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities> PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing <https://www.gov.uk/guidance/health-and-wellbeing> Sport England's Active Design Guidance: https://www.sportengland.org/activedesign <https://www.sportengland.org/activedesign>		
Policy C2 Local green spaces	Anglian Water	The policy designates two areas of Local Green Spaces (LGS) within the neighbourhood plan area. Anglian Water has assets forming part of our water and water recycling network located within or in the vicinity of these designated areas of local green space. For proposed area 15 'Horse Field north of eastern Staploe Lane', there is a sewer main pipe which crosses the southeastern portion of the site. For information, maps of Anglian Water's assets detailing the location of our water and water recycling infrastructure are available at: www.utilities.digdat.co.uk We consider the policy would provide scope for Anglian Water to undertake operational development to maintain and repair any underground network assets that may be within these areas, such as sewers, rising mains and mains water pipes, which would be consistent with the policy tests to upgrade or maintain these assets, and are generally 'permitted development'. Although there will be instances where the works could require planning permission. Policy C2 is explicit that manging development within a LGS should be consistent with national policy for Green Belts	Noted. There is no Green Belt in Bedford Borough and a degree of explanation is needed within the text. The wording is consistent with the NPPF	Yes

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
		i.e. paras. 153 – 155 of the National Planning Policy Framework (NPPF). 7 Paras.142 to 160 of the NPPF set out criteria regarding the types of development that may be appropriate in Green Belt areas. Whilst Anglian Water does not wish to object to the designation of important community assets, the current policy wording is not wholly consistent with the NPPF. This approach has been clarified in the Courts. (See Court of Appeal case R on the Application of Lochailort Investments Limited v Mendip District Council. Case Number: C1/2020/0812.) Policy C2 should provide the correct policy basis for decision-making if any future development was proposed on LGS and should be amended accordingly to reflect the NPPF only. The wording “and development should not be approved except in very special circumstances. Inappropriate development will be resisted to protect their special character and contribution to the Parish.” is not required and should be deleted. This will ensure that there is no doubt regarding the lawfulness of the policy and the restrictions on development with regard to LGS designation will continue to apply through the NPPF. The policy would then also meet the Basic Conditions. If you have any questions about this response or wish to discuss anything I have raised, please do not hesitate to get in touch. We wish to be kept informed on further stages of the plan’s preparation via strategicgrowth@anglianwater.co.uk The complete response from Anglian Water is available here: Anglian-Water-response-30-05-25.pdf		
Policy C2 Local green spaces	Robinson Hall on behalf of Bates Bros	I respond by way of letter in respect of the Staploe Green Infrastructure Plan Phase Two. On behalf of Bates Bros (Farms) Limited. Whilst my client understands the aspirations and desires of the plan, we feel that this is currently misleading. By titling the woodland areas under the access and open base theme, this would suggest that this green infrastructure is either available for access or open space. This is misleading and against all property rights. We would ask that this is updated to split off the green infrastructure from the recreational areas, as to suggest the two are under the same category will create trespass and breaches of the law.	The Green Infrastructure Plan emphasises that most of the green spaces are not accessible to the public.	N
Policy C3 Supporting local employment and agriculture				

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
Policy T1 Provision for pedestrians, cyclists & horse riders	Bedford Borough Council	Policy T1 – second paragraph - what is meant by to ‘reflect local heritage’? The materials for new roads, junctions and pavements are not covered by planning permission and it is not related to provision for pedestrian, cyclists and horse riders. Therefore, it is suggested that this paragraph should be deleted.	We don’t agree, some new traffic improvements may need planning permission as part of new developments and should be sympathetically designed so they are not ‘urbanising’. Therefore we think new traffic infrastructure should reflect local heritage eg. grass verges and hedges not high curbs and roundabouts.	No
Policy T1 Provision for pedestrians, cyclists & horse riders	Active Travel England	Thank you for your email. ATE is not a statutory consultee for Neighbourhood Plans. There is guidance available for neighbourhood groups that are developing a Neighbourhood Plan. This explains which transport matters a Neighbourhood Plan can address, including planning for active travel (walking, cycling and wheeling). You can access this on Locality’s Neighbourhood Planning website https://neighbourhoodplanning.org/toolkits-and-guidance/transport-matters-can-neighbourhood-plan-address/ .	Reference to the corner at Dairy Farm Cottage which is a particular safety issue should be added to the NP	Yes
Policy T1 Provision for pedestrians, cyclists & horse riders	Robinson Hall on behalf of Bates Bros	I respond by way of letter in respect of the Staploe Green Infrastructure Plan Phase Two. On behalf of Bates Bros (Farms) Limited. Whilst my client understands the aspirations and desires of the plan, we feel that this is currently misleading.... [See response under the green space policy C2].... Please could you also amend your map to make it clearer that where you are looking to create a new footpath that it is titled as such rather than as a Green Infrastructure Route as this is misleading. My client would be happy to meet with the Parish Council to discuss potentially working with them, on other aspirations of the plan tallying in with their Countryside Stewardship Mid-Tier Scheme, Sustainable Farming Incentive Scheme and other voluntary initiatives that the farm carries out. If it would assist, I would be happy to meet to discuss this letter further.	Concerns noted, to be discussed in the context of the GI Plan. No changes needed to the NP.	No
Policy T1 Provision for pedestrians, cyclists &	Bletsoes (Agents acting on behalf of landowners in Staploe and Honeydon).	Originally sent in 2023 in response to the Staploe Green Infrastructure Plan. Resent in response to the Neighbourhood Plan. I act for Landowners who own land around Staploe and Honeydon. I have reviewed the Current Consultation into the Staploe Green Infrastructure Plan Phase 2 on behalf of my clients, and I would like to register objections to the following aspirations outlined in the consultation document: Aspiration Reference Aspirational GI Enhancements:	Noted. These are aspirations which would require the consent of the landowner to be implemented.	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
horse riders		2 Create new Footpath north from Honeydon Road to Manor Farm Lane. 5 Upgrade Footpath 7 to Bridleway 6 Create new Bridleway between Footpath 7 and Footpath 12 – both potentially upgrade to Bridleway via aspirations 5 and 7. 7 Upgrade Footpath 12 to Bridleway 9 Create Footpath Link from southern end of Footpath 7 (potentially upgraded to Bridleway via aspiration 5) to western end of Footpath 24. 10 Create new Footpath linking Footpath 12 to Footpath 41 11 Create new Footpath north from Footpath 12 to Honeydon 22 Plant hedgerows along Footpath 7 (potentially upgraded to Bridleway via aspiration 5) 27 Improve and maintain Honeydon Brook My clients will not support increased public access to their working farms. The farms are in arable production with large machinery working across the land area with potential Health and Safety implications if public access is increased. My clients are also involved in Agri-Environment Schemes which seeks to increase the Biodiversity on the farm holdings. Public access can have a negative impact on wildlife habitats with a particular impact on ground nesting birds. I would therefore be grateful if you could remove these aspirations from future iterations of the Green Infrastructure Plan as my clients will not support any increased public access on their holdings..... I trust that the comments made in this letter will be given due consideration and the aspirations identified above removed from the future iterations of the Green Infrastructure Plan.		
Policy T1 Provision for pedestrians, cyclists & horse riders	Resident 8	In response to your Neighbourhood Plan consultation I would like to record my very strong objection to the aspiration to create a footpath down my drive and through my garden shown in the plan as “Green Infrastructure route 2” at Upper Honeydon Farm in Honeydon. I have to admit I am amazed that anybody should think it reasonable to create a footpath that passes in front of the house and garden of a private residence. This is a private garden and I do not support any attempt to create new rights of way through it !	Noted. This is an aspiration which would require the consent of the landowner to be implemented.	No
Policy T1 Provision for pedestrians,	Sport England	See comments under policy C2 Local Green Spaces.	No new developments are planned. The NP policy T1 complies with para 104 of the NPPF.	No

Paragraph/policy Number	Person/reference	Summary	Response	Changes to NP
cyclists & horse riders				
Policy T1 Provision for pedestrians, cyclists & horse riders	National Highways	Many thanks for consulting National Highways on the Staploe Parish Neighbourhood Plan Reg 14 submission. We have reviewed the submitted documents and would make the following comments. National Highways interests lie with the Strategic Road Network (SRN), in this case the A1. Broadly speaking, there are no issues with the submission and in general it seeks to promote sustainable travel which is welcomed. The improvements to the public realms would encourage more local and active travel; potentially reducing the need to travel further afield and thus on the SRN. Whilst none of the policies directly interact with the SRN, NH support the ideology to improve local amenities to encourage sustainable travel and promote neighbourhood travel. We once again thank you for consulting National Highways and look forward to your continued engagement with us at planningee@nationalhighways.co.uk <mailto:planningee@nationalhighways.co.uk> as the plan progresses.	Noted	No