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



# TO EACH MEMBER OF THE SUSTAINABLE COMMUNITIES OVERVIEW & SCRUTINY COMMITTEE

01 June 2012

**Dear Councillor** 

# SUSTAINABLE COMMUNITIES OVERVIEW & SCRUTINY COMMITTEE - Monday 11 June 2012

Further to the Agenda and papers for the above meeting, previously circulated, please find attached the following item, which the Chairman has agreed to receive as an urgent item of business by virtue of Section 100B 4(b) of the Local Government Act (1972) in light of a view being required from the Committee prior to commencing a formal public consultation:-

#### 11. **Draft Development Strategy for Central Bedfordshire**

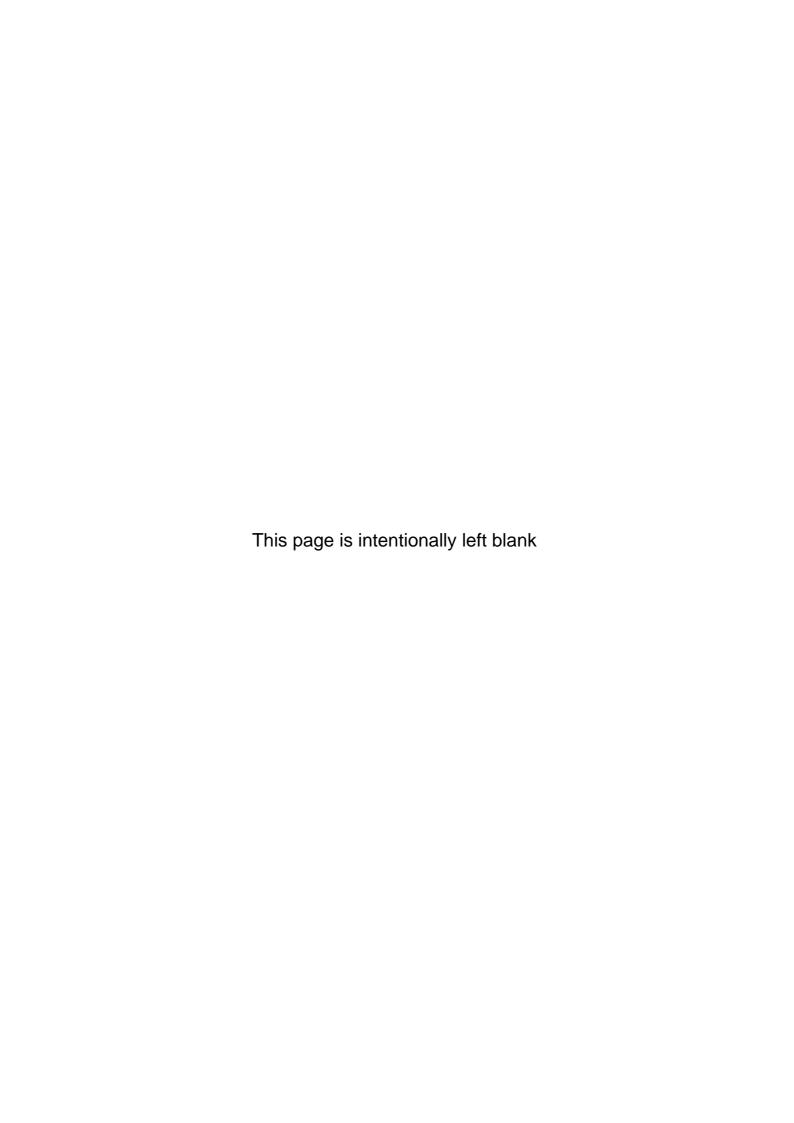
To consider as an urgent item of business the draft Development Strategy for Central Bedfordshire.

Should you have any gueries regarding the above please contact the Overview and Scrutiny Team on Tel: 0300 300 4634

Yours sincerely

email: jonathon.partridge@centralbedfordshire.gov.uk

Jonathon Partridge, Scrutiny Policy Adviser



Meeting: Sustainable Communities Overview and Scrutiny Committee

Date: 11 June 2012

**Subject:** Draft Development Strategy for Central Bedfordshire

Report of: Cllr Nigel Young, Executive Member for Sustainable Communities –

Strategic Planning and Economic Development

**Summary:** The report follows the Committee's consideration of the draft

Development Strategy on 16 May 2012. Additional material is presented for consideration and the Committee is asked to consider whether it has

further comments to make in the light of this material.

Advising Officer: Richard Fox, Head of Development Planning and Housing

Strategy

Public/Exempt: Public

Wards Affected: All in Central Bedfordshire

Function of: Council

#### **CORPORATE IMPLICATIONS**

# **Council Priorities:**

1. The Development Strategy, as an overarching planning policy document, has the potential to contribute to each of the five Council priorities. The main focus of the document is to achieve the Council Priority to manage growth effectively, but the document also deals with the remaining 4 priorities to some degree.

#### Financial:

2. The report to the Executive on 4 October 2011 included detail on the costs associated with producing a Development Strategy and the costs of not producing one. The Executive agreed that there was a need to produce a Development Strategy, with the associated financial implications.

In terms of this current report, the Committee is being asked for its view on the content of the draft document prior to public consultation. There is a financial cost of the public consultation but this consultation would need to take place whatever the final content of the document.

#### Legal:

3. Once adopted the Development Strategy will form part of the statutory Development Plan and will be the basis for consideration of planning applications. Until this happens the existing adopted documents will continue to set the planning framework.

# **Risk Management:**

4. The process of producing a Development Strategy and other planning policy documents is long and complex and high quality project management and risk management skills are required. A Project Board has been established to oversee the work.

Among the risks being monitored by the Board is the risk of being inundated by a larger number of comments through the consultation process, which could jeopardise the timetable moving forward. Rather than limit the opportunities to comment or restrict the circulation of documents, this risk has been managed by trying to establish key issues at as early a stage as possible, mainly through the questionnaire and workshops. If views are taken on board early in the process, there is often less need for people to comment during later stages of consultation.

# Staffing (including Trades Unions):

Not Applicable.

#### **Equalities/Human Rights:**

6. The Development Strategy will be subject to a specific Equality Impact Assessment and the results will be reported back to Members before the document is submitted.

#### **Public Health**

7. The Development Strategy could have a number of benefits in terms of public health and wellbeing. There is a specific section of the document that seeks to summarise the interactions between strategic planning and public health. These include promoting healthy lifestyles through enabling walking and cycling and through appropriate leisure and open space provision. Health infrastructure and securing appropriate developer contributions towards such provision are also important aspects, in association with the Community Infrastructure Levy (CIL).

# **Community Safety:**

8. Various policies within the Development Strategy address community safety issues, particularly those relating to standards for new development.

# Sustainability:

9. The Development Strategy has as its underlying basis the achievement and delivery of sustainable development. The Development Strategy has been subject to a specific Sustainability Appraisal/Strategic Environmental Assessment in order to comply with the relevant regulatory requirements. The initial results of this work for key policy areas were attached at appendices B to E to the OSC report on 16 May 2012. The full appraisal work will be published for comment alongside the Development Strategy.

#### **Procurement:**

10. Not applicable

# **RECOMMENDATION(S):**

That the Sustainable Communities Overview and Scrutiny Committee consider the additional material attached at Appendix A and Appendix B. The Committee is asked to advise the Executive Member for Sustainable Communities (Strategic Planning and Economic Development) and the Assistant Director (Planning) of any further comments to make in the light of this material.

# **Background**

- 11. The report presented to the Committee on 16 May set out the background to the Development Strategy and the process followed thus far. The Committee considered the draft document and Sustainability Appraisal technical note and gave a number of views in order to advise the Executive Member and relevant Assistant Director in exercising their delegated authority to approve the draft document for consultation purposes. A number of amendments to the draft Strategy have been put forward in response to the Committee's views, including in relation to the impact of new development on infrastructure and amendments to the Settlement Hierarchy.
- 12. Since the meeting on 16 May a number of issues have been raised that may affect the Committee's previous consideration. In order to ensure the advice given to the Executive Member and Assistant Director is as complete as possible, the Committee are asked to consider the additional material and comment as appropriate.

# **Site Selection process**

- 13. A key issue with any strategic plan of this type is the distribution of development and the analysis of the various alternatives available. The advantage of using a set of criteria for site assessment purposes is that it brings rigour and clarity to what can otherwise be a difficult and complex process. At the previous meeting it was pointed out by the Committee, and acknowledged by officers, that the presentation of material on the assessment of sites was perhaps not as clear as it could have been.
- 14. It was also the case that the previous Sustainability Appraisal technical note did not contain information on certain sites that could have been included to help the Committee come to a view on the draft Development Strategy.
- 15. Appendix B to this report contains a revised site assessment section to the Sustainability Appraisal Technical Report. The main differences are:
  - Updated and expanded section on the methodology for site selection
  - Revised scoring and summary tables for each site
  - New section explaining how the results of this process have been considered, what other issues have also been factored in and how the overall conclusions have been reached.

- 16. In presenting this additional material, officers are not recommending any changes to the draft Development Strategy considered by the Committee at the last meeting. The revised scores and the addition of several new sites have not altered officers' overall conclusions on the recommended package of sites.
- 17. Members are invited to consider the additional material at appendix A and put forward any further comments for consideration by the Executive Member and Assistant Director.

#### **Consultation findings**

- 18. At the previous committee meeting a number of comments were made in relation to the informal consultation carried out during February and March 2012. The findings of this consultation were important in informing the content of the draft Development Strategy. However, comment was made that there was no specific material presented to the Committee on its conclusions. There is now the opportunity to present the findings from this consultation and be more specific as to how the results have fed into the draft Strategy.
- 19. The draft Consultation Statement attached as appendix B to this report summarises what consultation activity took place and what respondents said were their key issues. The full set of appendices to the Consultation Statement will be published alongside the Development Strategy but to help the Committee's consideration the two most relevant appendices G and H have been included here, which summarise the results from the informal questionnaire and the workshops respectively.
- 20. As can be seen from this material many of the comments and priorities expressed have been able to be incorporated in some form within the Development Strategy. However, there were occasions when issues were not able to be taken fully on board. The most high profile of these issues was in respect of overall housing provision. Appendix B explains why the housing provision level was recommended at the level it was and refers to the housing technical paper and Sustainability Appraisal results. It is also worth noting that the results of the workshop were much more balanced than those from the questionnaire, suggesting that having discussed the issues and heard presentations on the evidence findings, people came to a different view.
- 21. The upcoming consultation on the draft Development Strategy will give people a further opportunity to reflect on the issues and respond accordingly. The results of this consultation will feed in to the revised version of the Development Strategy due to be considered by Executive in November.
- 22. Members are invited to consider the additional material at appendix B.

# **Statement of Community Involvement**

23. Alongside the draft Development Strategy, a draft Statement of Community Involvement (SCI) will also be published for consultation. The SCI sets out the requirements and processes for consulting on all types of planning documents, including Neighbourhood Plans and planning applications. There is no requirement to publish the draft SCI for widespread comment but it was felt appropriate to link it with the Development Strategy consultation in order to add further robustness to the document.

24. Unlike the Development Strategy, the SCI is a purely procedural document and is based on previous SCIs for the north of Central Bedfordshire and the joint SCI produced by the Joint Committee. On this basis, it was felt more appropriate to gain Overview and Scrutiny Committee input following the public consultation rather than before. The SCI will then be considered by Executive for adoption in October 2012.

# Timetable and next steps

- 25. The timetable for future stages of work on the Development Strategy was set out in the report to the 16 May meeting. The additional step of reporting back to Overview and Scrutiny Committee was not included within the previous timetable and so will lead to a short delay in the start of the consultation. However, subject to the comments made by this Committee and formal sign-off by the Executive Member and Assistant Director under delegated authority, the public consultation is expected to begin on 20 June, some 9 days later that previously planned. This short delay unfortunately takes the end of the consultation period into the school summer holiday period. While there are no Bank Holidays during this period and not everybody will be on leave at that moment, it is still felt appropriate to add a further week to the usual six-week consultation period. The consultation period is therefore expected to run from 20 June until 8 August.
- 26. Following the consultation period, the revised document will need to be reported to Executive, programmed for November. Without knowing the number and scope of comments made during the consultation period it is difficult to predict how long it will take to respond to the consultation and produce a revised draft. The short delay to the consultation will reduce the time available to respond to representations but is unlikely to lead to a delay in reporting back to Executive. As stated above, the key determinant of reporting times will be the number and scope of representations made during the consultation period.
- 27. It is worth reiterating that the Development Strategy to be published in June will be a <u>draft</u>. While every effort has been taken to ensure it is as complete a document as possible, inevitably there will be issues that arise from the consultation period and further technical work. This step is just one in a series leading up to the Submission of the document next May.

#### Appendices:

Appendix A – revised Sustainability Appraisal technical note ("Strategic Site Assessment Methodology" section only)
Appendix B – Draft Consultation Statement

**Background papers and their location:** (open to public inspection) None

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# Appendix A

[This section replaces the site assessment section of the Sustainability Appraisal technical note circulated for the 16 May meeting, p44 onwards]

# 4.0 Strategic Site Assessment process

- 4.1 This section of the SA report sets out the process for the selection of strategic sites, to be allocated through the Development Strategy. The assessment criteria have been developed based upon the requirements of the draft Development Strategy together with a series of sustainability factors.
- 4.2 The initial first step was to identify the realistic alternatives to assess. Inevitably there will be a huge number of possible alternatives but only the realistic alternatives need to be considered. The focus of the Development Strategy will be on allocating strategic-scale sites and a first step was to identify what a strategic site might be. Whether a housing or mixed-use site is strategic will depend on a range of factors, primarily site size or number of dwellings but also taking into account the context and location of a site.
- 4.3 A threshold of 500 dwellings (or 20 hectares where the number of dwellings has not been specified) was used as an initial indication of whether a site might be strategic in the context of the overall Development Strategy requirements.
- 4.4 A site to the West of Linslade was right on the limit of being strategic and may well have fallen below the threshold, depending on the scheme taken forward. However, given the previous level of interest in the site expressed through the Joint Core Strategy process and a planning application it was felt prudent in the interests of transparency to include it for consideration. As with the area to the east of Luton, this site falls outside of Central Bedfordshire.
- 4.5 For the north of Central Bedfordshire a different approach was needed. The recently adopted Core Strategy and Site Allocations documents have left a legacy of well-located, suitable housing and mixed use sites that will continue to meet local housing needs for many years to come. The vast majority of the unmet housing need is considered to be in the south of Central Bedfordshire (see the housing technical paper for further details) and therefore the focus for new sites should also be in the south.
- 4.6 Given Green Belt constraints in the south it was necessary to consider some development options in the north, acknowledging that such provision would be likely to lead to residents having to relocate effectively "leapfrogging" the Green Belt. However, it was only felt appropriate to consider very large development options under this scenario, options that could act as a replacement for the large urban extensions being considered in the south. It would be a considerable

strategic decision not to meet housing need where it arises but instead relocate residents further north and this should only be done on a large scale and not by "pepperpotting" a large number of smaller sites across the north of Central Bedfordshire.

- 4.7 On this basis a higher threshold of 2,000 dwellings or 70 hectares was used to identify strategic sites in the north. Two sites at Sandy were considered jointly as a larger extension to Sandy. Despite falling below the threshold, a further site at Wixams was also identified for further consideration as it forms part of a larger extension to the Wixams identified through the previous round of plan-making. There are local considerations that make this proposal worthy of further consideration and hence this site was also taken forward for further consideration.
- 4.8 A total of 19 sites were taken forward for more detailed consideration as set out in Tables 1 and 2.

#### Site assessment methodology

- 4.9 In order to apply a rigorous assessment process to select the most suitable and sustainable sites each strategic site option was assessed under a number of different criteria, as explained further below. In order to be able to rank the sites against one another, the following rating system has been used:
  - Dark Green (DG) No concerns, with positive impacts identified;
  - Light Green (LG) No significant concerns identified, with some possible positive impacts;
  - Yellow (Y) No overall effect or unknown effect (further information required to make an evaluation);
  - Amber (A) Some concerns and/ or constraints identified:
  - Red (R) Some significant impacts and concerns identified

# (1) Environmental Constraints

4.10 Primary constraints are considered immoveable such as physical matters and national designations. These constraints considerably restrict development on the site and include: Flooding; Area of Outstanding Natural Beauty; Sites of Special Scientific Interest; Heritage Assets and Landscape Sensitivity.

# A - Flooding

Contains Flood zone 2 Contains Flood zone 3a Contains Flood zone 3b

**B** - Area of Outstanding Natural Beauty

No AONB

Adjoins/borders

Within AONB

Part of site contains AONB

#### **C - Sites of Special Scientific Interest**

No SSSI

Adjoins/borders

Within SSSI

Part of site contains SSSI

#### D - Heritage Asset

No Heritage Asset

Adjoins/borders

Within Heritage Asset

Part of site contains Heritage Asset

# **E** - Landscape Sensitivity

High

Moderate

Low

4.11 Secondary constraints are considered to be more localised constraints. They are considered to have an impact on development but would constrict development less than primary constraints. These include: Conservation Areas, Listed Buildings, Area of Great Landscape Value, Agricultural Land Designations and County Wildlife Sites.

#### F - Conservation Areas

No conservation area

Adjoins/borders

Within a conservation area

Part of site contains a CA

#### **G** - Listed Buildings

No listed buildings

Adjoins

Contains a listed building

#### H - Area of Great Landscape Value

No AGLV

Adjoins/borders

Within an AGLV

Part of site contains AGLV

# I - Agricultural Designations

The Agricultural Land Classification (ALC) system classifies land into five grades, with Grade 3 subdivided into subgrades 3a and 3b. The 'best and most versatile land' is defined as Grades 1. 2 and 3a.

# J - County Wildlife Sites

No CWS

Adjoins/borders

Contains CWS

(2) Measuring Green Belt and coalescence impacts

- 4.12 This criterion is in addition to general landscape considerations and assesses impacts of land which falls within the designated Green Belt areas as well as looking at issues concerning coalescence. It seeks to identify whether the land in and around the development site meets any of the Green Belt objectives, as identified in the National Planning Policy Framework (NPPF). This criterion will be linked to the Green Belt Review work being undertaken.
- 4.13 Scoring and ranking system (with comments) are required:
  - 1) To check the unrestricted sprawl of large built-up areas.
  - 2) To prevent neighbouring towns from merging into one another.
  - 3) To assist in safeguarding the countryside from encroachment.
  - 4) To preserve the setting and special character of historic towns.
  - 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.14 2 points each are to be given if the Green Belt meets criterion 1, 2 or 3. 1 point each is to be given if the Green Belt meets criterion 4 or 5 with a maximum score of 8 allowed.

# (3) 'Deliverability'

- 4.15 This criterion gives an indication if the site is being actively promoted by the land owners or agent. This provides an indication of the viability of the site and when the site will come forward for development using the following questions:
  - A Can the site be divided into deliverable parcels?
  - B Is the site able to 'merge' with others to create a large site for development?
  - C Willingness of landowners to bring forward land
  - D Level of co-operation with multiple ownership
  - E Likelihood of site progressing at the required rate
  - F Viability of development to provide key infrastructure
  - G Capacity of development

# (4) 'Suitability'

4.16 This criterion determines whether the development site is suitable for development and meets the primary objectives of the draft Development Strategy (DS). It will also determine whether it is consistent with the Sustainability Appraisal (SA) objectives.

Criteria on 'Suitability'	Relevant SA and DS objectives
A - Protection and enhancement of	SA objectives 1+3 and DS objective
environmental and cultural assets and	4
the provision of strategic green	
infrastructure	
B - Ensuring that there is an efficient	SA objective 2
use of land such as developing on	
previously developed land, securing	

	T
appropriate densities of development	
and not developing on high quality	
agricultural land	
C - Reduce Pollution	SA objective 4
D - Reduce risk of flooding	SA objective 5
E - Adapting to and mitigating against	SA objective 6 and DS objectives
the impact of climate change and	5+7
increasing resource efficiency	
F - Promote sustainable waste	SA objective 7
management	
G - Securing high standards of design	SA objective 8 and DS objective 7
and protecting the character of the	
built environment	
H - Providing a mix of good quality	SA objective 9 and DS objectives
housing for all through delivering	1+2
various sizes, tenures to meet the	
local housing need	
I - Achieving economic growth through	SA objective 10 and DS objective 3
the provision of a range of commercial	,
premises and securing local	
employment opportunities	
J - Encourage healthier lifestyles and	SA objective 11 and DS objective 5
reduce adverse health impacts of new	,
development.	
K - Ensuring that the development	SA objective 12 and DS objective 8
contributes to the provision of	
infrastructure, services and facilities	
L - Provision of sustainable integrated	SA objective 13 and DS objective 8
transport systems to encourage more	
sustainable modes of transport and	
improved access and mobility	
M - Contribution to the regeneration	A non SA objective and DS
and vitality of the town centres	objective 6
N - Ensuring that the development site	A non SA and DS objective
is well connected to the existing	, then entand be objective
settlement	
COLLIGITION	

#### (5) Transport/ accessibility

- 4.17 In terms of transport/accessibility, the assessment had four parts:
  - A measure of the relative proximity of railway stations, taking into account the level of service on each line;
  - The potential for development sites to contribute towards new bus provision, based largely on the size of the development.
  - A measure of the relative access to services and facilities. Given that the majority of sites are large enough to provide their own facilities and services, the emphasis in this section was on access to higher level services in town centres.
  - A measure of the possible impact on the transport network. This
    assessment was based on initial modelling work by the Council's

consultants AECOM using the Central Bedfordshire and Luton Transport Model (CBLTM). The modelling work displays the traffic volume/capacity ratio for the main network links within the area at 2009 and 2031, based on current committed development only. This provides an indication of where there is current or forecast stress on the network that can then be related to individual proposals. The assessment provides a score between 1 and 5 (the higher the score the better the site) as to its likely impact on the network. This has been done on the basis of a site coming forward in isolation. These two scenarios do not take into consideration the implications for combinations of sites coming forward. This will feature in further modelling work which will be reported in due course.

# (6) Overall Commentary

- 4.18 Present overall findings and recommendations of sites/locations for inclusion or reasons for rejecting them, as appropriate.
- 4.19 Table 1 below shows the colour grading system explained above for each aspect of the assessment for each site. This table allows for an easy reference and visual summary of the findings to date. Table 2 provides further detail on how the individual scores have been arrived at.

#### Towards a distribution strategy

- 4.20 Having appraised the various sites and options available it was necessary to determine which should be taken forward as "strategic allocations" through the Development Strategy. There were more options assessed than are required to meet needs and the site assessment process provides a steer in selecting the most appropriate options. However, it is not always possible to reflect each and every issue through the site assessment process and there will inevitably be an element of judgement to be made on which site is most suitable. While the site assessment process provides a helpful steer, other factors need to be taken into account.
- 4.21 One critical area not covered by the site assessment process is in relation to housing need. The local population and household projections provide an indication of the overall level of housing need across Central Bedfordshire. These projections are split down into the north and south of Central Bedfordshire, based on the old Mid Beds and South Beds administrative areas. The projections indicate that a larger proportion of the growth might be expected in the north of Central Bedfordshire compared to the south. The Housing technical paper sets out the limitations of the projections insofar as they simply project forward past trends. While the overall quantum of household growth for Central Bedfordshire is considered to be realistic, the

- Council considers there to be a much more even spread of household growth between the north and south of Central Bedfordshire.
- 4.22 The Housing technical paper also compares the level of household growth that might be expected in each area, based on current population levels, with the scale of new housing currently committed. This suggests where there might be a relative "oversupply" or "undersupply" of homes compared with new households. Based on the currently committed development, this work shows that there are more households than homes predicted in the south of Central Bedfordshire whereas in the north the reverse is true. This comes as no surprise given recent planning activity and the large number of new sites recently allocated in the north. Planning policy work in the south of the area has not advanced to the same stage and hence there is a need for new sites here.
- 4.23 In addition, the influence of migration patterns needs to be considered. The largest single net migration movement is from Luton, with an annual average of around 1,250 people moving from Luton to Central Bedfordshire every year. The causes of this migration are numerous and varied but one of the main causes is likely to be related to housing supply. The Strategic Housing Market Assessment (2010) sets out the supply of dwellings across Bedfordshire and illustrates that there is a relative shortage of family homes in Luton. This, combined with the environmental attractiveness of Central Bedfordshire, is likely to be a main factor in households moving from Luton to Central Bedfordshire.
- 4.24 However, Luton remains an important employment centre with commuting from Central Bedfordshire into Luton a notable feature. The migration of households into Central Bedfordshire places more pressure on an already heavily-used transport system as people commute back to Luton to work.
- 4.25 These factors combine to make a strong case for more development in and around the Luton/Dunstable/Houghton Regis conurbation a case which the Council considers would represent the "exceptional circumstances" needed to trigger a review of the Green Belt in this location. Providing an attractive mix of housing, particularly family housing, close to the conurbation and with good transport links will not only help meet housing needs within the southern part of Central Bedfordshire but will also help the needs of those currently migrating from Luton to other parts of Central Bedfordshire.
- 4.26 Of the alternatives to this strategy, the site assessment process showed that the Marston Vale has some merit as a potential location for growth. However, given the current distribution of housing need within Central Bedfordshire and the supply of sites coming forward, the Council considers that a package of sites around the conurbation will perform better at this stage than a large-scale northward relocation of residents.

- 4.27 The land south east of Milton Keynes would largely be addressing housing needs arising in Milton Keynes rather than Central Bedfordshire. The Milton Keynes Core Strategy does not propose any development on the Milton Keynes side of the boundary and it is therefore considered inappropriate to provide for development within Central Bedfordshire.
- 4.28 A further factor to consider as part of this process is the relationship between development and infrastructure not only where development can be accommodated within existing infrastructure but also where development can be used to bring about new or improvements to existing infrastructure. A number of the mixed-use strategic sites are all of a size and in a location that can enable infrastructure improvements that will benefit existing residents as well as the new development. This is particularly the case for the land north of Houghton Regis proposal, which is facilitating the development of the A5/M1 link road and the Woodside connection. These pieces of new strategic infrastructure are critical to the future success of Dunstable and Houghton Regis and the fact that the development site will help their delivery weighs significantly in favour of the proposal.
- 4.29 The proposal for land north of Luton will also enable the delivery of a link road between the M1 and A6. While of a lesser importance than the A5/M1 link road it will provide a useful connection between main roads and ease movement in the northern part of Luton. This development also has the potential to enhance access to the countryside for new and existing residents and provide a more appropriate urban edge.
- 4.30 Land east of Leighton Linslade will also help to deliver benefits to the town, including a link road between Heath Road and Stanbridge Road and new accessible greenspace around Shenley Hill and Clipstone Brook.
- 4.31 Having established the need for development in the south of the area it was then necessary to consider which of the possible sites in this area are most suitable. The site assessment process showed that the sites north of Houghton Regis, north of Luton and east of Leighton Linslade had more strengths and less weaknesses than the alternative sites at North West Dunstable, West Linslade, West Luton and East Luton. The site to the east of Luton is within North Hertfordshire district and would therefore fall to be considered as part of the plan-making activities of North Hertfordshire District Council. While the site assessment process has identified certain constraints to development, these constraints are not considered to be fundamental and Central Bedfordshire Council will play a positive and cooperative role in helping North Hertfordshire District Council, in discussions with Luton Borough Council, to consider potential growth this area.

#### Table 1 - Summary of findings for assessment of each individual sites

Key:
Dark Green (DG)
Light Green (LG)
Yellow (Y)
Amber (A)
Red (R)

No concerns, with positive impacts identified
No significant concerns identified, with some possible positive impacts
No or unknown effect (further information required to make an evaluation)

Some concerns and/ or constraints identified

Some significant impacts and concerns identified

Site	Proposal						
Site	Proposal	Constraints	Green Belt/ coalescence issues	Deliverability	Suitability	Accessibility	Overall comment
Aspley Guise     Triangle area	330 hectares located to the South East of Milton Keynes in CBC: - 6,000 dwellings and 15ha employment? - community facilities - any other uses required as part of MK growth	A	A	A	A	LG	A
2. East of Leighton Linslade	Greenfield development primarily comprising: -2,500 new homes -16ha employment land - mixed uses	LG	A	LG	LG	Y	LG
3. East of Luton	Mixed-use development located in Hertfordshire comprising: - between 3,000 and 5,000 new homes; - associated infrastructure	A	R	Υ	LG	LG	А
4. Marston Vale Comprehensive Mixed Use Area	200ha. (approx.) comprising: - up to 5,000 dwellings - community/ leisure facilities - retail - employment land 70ha (approx.) - mixed use - 30% woodland plantation	LG	LG	DG	LG	LG	LG
5. North Houghton Regis	An urban extension comprising: - 7,000 new homes - Associated infrastructure - 40ha employment land	LG	A	LG	LG	LG	LG
6. North of Luton	Urban extension comprising: - community facilities - 4,000 new homes - 20 ha employment - contributions to the North Luton Bypass	Y	R	LG	LG	LG	LG
7. North West Dunstable	- 650 new homes - Employment space - Open space	A	A	LG	A	Y	Α
8. Sundon RFI	Proposed capacity approximately 55 ha in area. The RFI will be approximately 5 ha in size and provision for 40 ha (approx.) of employment land. Approximately 7 ha to the north could be developed as a potential minerals distribution depot	LG	R	LG	LG	Y	LG
9. West of Leighton Linslade	Development comprising: - 250-500 new homes - employment land - open space - associated infrastructure	A	DG	Y	Y	Y	Y
10. West of Luton	Mixed use development comprising: - 5,500 new homes - 27.6ha employment land - mixed use	A	R	Υ	A	Y	A
11. Land to the South of the Wixams Southern Expansion Land	An extension to current site allocation MA3: 500 dwellings (35% affordable) - Primary School, community facilities - Country Park (to act as southern buffer for Wixams) - 3.5 hectares of Employment land (B1/2/8) - Mixed use local centre - Energy centre	DG	DG	DG	DG	LG	DG
12. North of Leighton Linslade	Mixed use development (325.9 ha) comprising: -residential -employment -hotel and conference centre -schools -open space (both informal and formal) -caravan park	A	R	Y	Y	A	А

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Site	Proposal	Constraints	Green Belt/ coalescence issues	Deliverability	Suitability	Accessibility	Overall comment
13. North of Wing Road, Leighton Linslade	Development (unknown size of site) comprising: -residential -open space	Y	А	DG	Y	Y	Y
14. North of Higham Road, Barton-le-Clay	Mixed use development (74.54 ha) comprising: -527 dwellings -4.22 ha of employment land -hotel -school -open space -extension of village centre	LG	A	DG	Y	A	Y
15. Crowbush Farm, Toddington	Mixed use development (23.37ha) comprising: -residential -leisure -recreation	Y	A	LG	Y	A	A
16. North West of Caddington	Development (44.62ha) comprising: -800 dwellings	R	A	DG	A	A	A
17 Land West of Midland Mainline, Harlington	Mixed use development (71ha) comprising: -unknown amount of residential	A	A	А	A	Y	A
18. Land West of Salford	Mixed use Development (466ha – includes land both in MK and CB) comprising:  -8,150 dwellings (40% of which will be in CBC) -local centre on 18ha -employment on 16ha -education on 30ha -roads and open space on 168ha	A	LG	Y	A	Y	Y
19. Land North and East of Sandy	Mixed use Development (80ha) comprising: -2000 dwellings -open space -employment land -local centre	Y	DG	LG	Y	Y	Y

Conclusion	Score: Amber Proposed allocation in the Development Strategy: No  • the site would provide housing to contribute towards meeting local housing need • It will provide little contribution to infrastructure in the wider area • Increase congestion • Negative impact on landscape and archaeological features and the Maiden Bower Heritage Asset
Accessibility	This scheme is much smaller than many of the sites assessed and the transport impact will therefore be more localised. Conditions would be made easier through the provision of the A5/M1 link reducing traffic on the A5. This development would not be of a sufficient size to provide any meaningful new infrastructure.  Poor access to Luton and Leagrave stations The development would not be of sufficient size Close to Dunstable town centre
Suitability	-The site will provide housing to contribute towards meeting local housing need and housing need and infrastructure.  - It will provide little contribution to infrastructure in the wider area and will also impact on the local road network, particularly increasing congestion on the A5, and does not offer significant opportunities to improve this except for financial contributions to improve local traffic management measures.  - The Maiden Bower Heriage Asset located in the development site is highly sensitive to development will have an impact on its setting.  - Overall this proposed development is considered unsuitable for development.
Deliverability	The site is being promoted by a developer on behalf of the landowner.  The site would be deliverable in the plan period.
Green Belt/ coalescence issues	Although located in the Green Belt, it will not result in coalescence with neighbouring villages.
Constraints	Green Belt Sensitive landscape resulting from SAM.
Proposal	- Employment space - Open space
Site	7. North West Dunstable

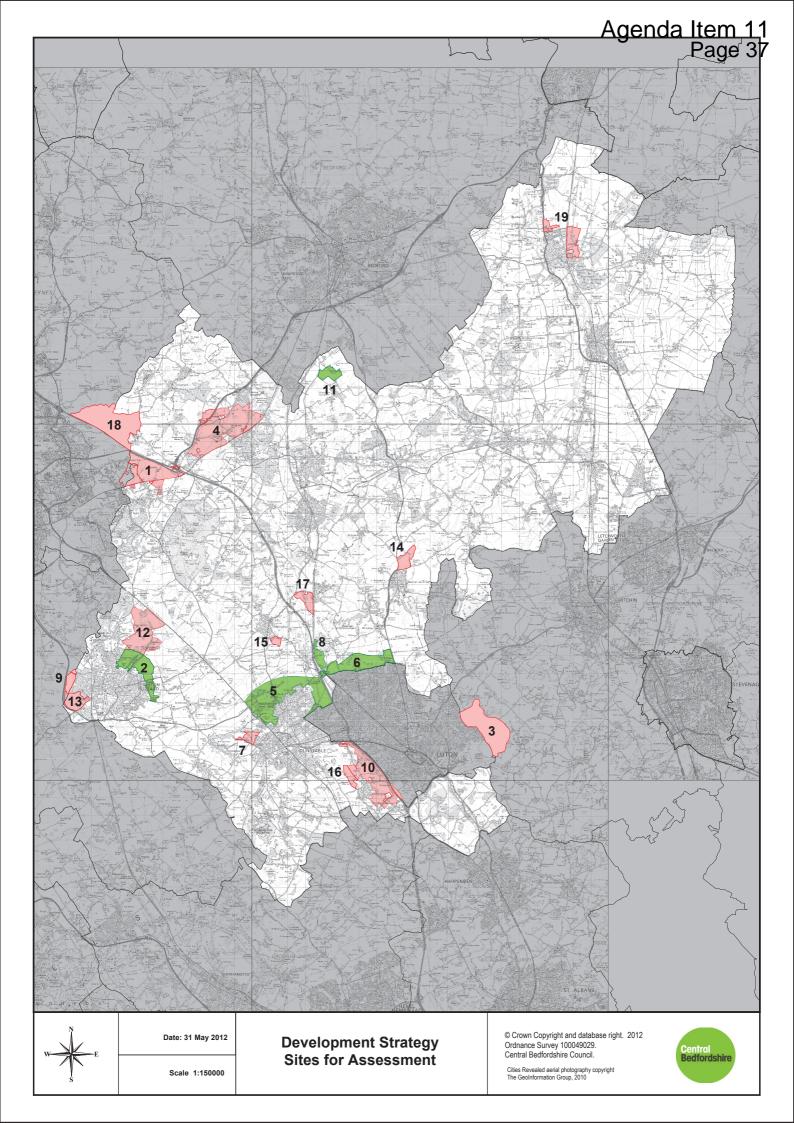
Conclusion	Score: Light Green Proposed allocation in the Development Strategy: Yes  This site will contribute to the economic growth of the area by providing much needed employment opportunities to complement the growth North of Luton and Houghton Regis.  Offer the opportunity for enhancement of the CWS and SSSI, and provide contributions to the Luton Northern Bypass.
Accessibility	As with North Luton and North Houghton Prop Regis above, this scheme is reliant on the new Mr junction.  Once this is in place, it would be well located to the strategic road and rail networks.  Relatively good access to Harlington Station The development is not residential. However there is potential for a sustainable transport link to the site.  Relatively close to Luton town centre
Suitability	-The site overall is suitable for this type of developmentThe railway line and it's proximity to the M1 provide the opportunity for the location of a Rail Freight Interchange, and complementary B8 floorspaceThe site will contribute to the economic growth of the area by providing much needed employment of the economic growth North of Luton and Houghton RegisThe development of the Complement of the Opportunities to complement of the Europhortunity for enhancement of the SSSI, and provide contributions to the Luton Northern BypassThe site is not directly connected to the urban area but would be connected to the urban area but would be connected to the urban area but would be connected to the Undon dependant on Junction I and the Luton Bypass, both of which could impact on the delivery of this site in the short and medium term.
Deliverability	Sundon RFI is reliant on the construction of the Luton Northern Bypass and Junction 11A for access to the Mt, both of which are dependent on the North Luton Mixed-Use development coming forward as this development is expected to contribute to the funding of this infrastructure, as well as Sundon RFI.
Green Belt/ coalescence issues	Score 8 out of 8 in terms of meeting the objectives set out in the NPPF  The Green Belt has provented growth north of Luton thus protecting the countryside from development.  The green belt has also prevented the villages from merging with each other and preserved the setting of Sundon Manor.
Constraints	Provides an opportunity to enhance and maintain the SSSI and CWS to the east of RFI.
Proposal	40ha employment land associated with the rail freight interchange (5ha), potential for an additional 7ha for employment land (minerals distribution depot) to the north of the site.
Site	8. Sundon Rail Freight interchange

Conclusion	Score: Yellow Proposed allocation in the Development Strategy: No  The site is constrained in terms of landscape sensitivity Is located within a neighbouring Local Authority is not of a strategic size and nature to support the aims and objectives of the Development Strategy
Accessibility	Congestion is predicted to increase on the A4146 and A418 that provide access to this area. Development of this site would worsen this congestion. The proposal would not be of sufficient size to bring forward any meaningful new infrastructure. The site is relatively close to the two centre and sustainable modes of transport are viable.  Good access to Leighton Buzzard station  The development would not be of sufficient size  Relatively close to Leighton Buzzard town centre  Relatively close to Leighton Buzzard town centre
Suitability	- The scale of the proposed development has been reduced and the developed area is to be on lower ground to minimise the landscape impact although this will still have a negative effect on the landscape.  - The provision of the Country Park in areas of high landscape sensitivity would be a benefit to the local community providing accessible open space. The site is not within CB so delivery depends on Aylesbury Vale DC.
Deliverability	The site is being promoted by a developer on behalf of the landowner.  The site would be deliverable in the plan period.
Green Belt/ coalescence issues	The site is not located on Green Belt and there are no villages in close proximity to the west of Leighton Linslade. The fact that the site is not Green Belt is largely for administrative, rather than strategic planning, reasons
Constraints	The site is located on landscape characterised by high landscape value, particularly on the upper ridges in the west of the site.  The views into the site are rural.  There is limited access into the site.
Proposal	Mixed use development comprising: - 250-500 new homes - employment land - open space - associated infrastructure
Site	9. West of Leighton Linslade

Conclusion	Score: Amber Proposed allocation in the Development Strategy: No This site has not been selected for allocation in the Development Strategy because:  The site suffers from considerable environmental considerable environmental considerable sconstraints Largely detached from Leighton Linslade but not large enough to be a self contained settlement Poor existing public transport links
Accessibility	There is existing congestion around the A5 at Hockliffe and further development north of Leighton Linslade has the potential to worsen this congestion. Congestion Could also increase in Linslade town centres. It is not clear what type of development is proposed at this stage and therefore what mitigation measures might be possible. A development of this scale is unlikely to be well self-contained in transport terms and existing public transport links are not well developed.  Leighton Buzzard station is relatively difficult to access  Development could station is relatively difficult to access  Development could support a new bus route  Relatively poor access to Leighton Linslade town centre
Suitability	-The site suffers from considerable environmental constraints that need to be mitigated.  It lies in an area where mineral extraction takes place and it is unclear from the proposals exactly how development would impact upon this.  -The delivery of the site is dependent on delivery of East Leighton Linslade, as without this additional development to the south, it would esvelopment to the south, it would estension to Heath and Reach with poor connectivity to Leighton Linslade.  -Should this proposal take place in addition to last Leighton Linslade, it is considered that this would represent an over concentration of new development in this area.
Deliverability	The site is being promoted by a planning consultant on behalf of one land owner.  The site is deliverable in the plan period. The consultant estimates it will take 5-10years for development to commence with another 10-15years for the site to be competition at the end of the plan period.
Green Belt/ coalescence issues	The site is located within the Green Belt. This area has previously prevented urban sprawl to the urban sprawl to the worth which could connect Leighton Linslade with Heath and Reach.  The proposal for a country park/open space on the development could encourage improved access and mobility through the provision of cycle and walking routes through the sitte.
Constraints	The water bodies in the north of the site are within both flood zone 2+3  There are two SSSIs/CWS one in the north and the other in the south of the site. Another SSSI adjoins the site. An AGLV adjoins the Northern and Eastern boarders.  The vast majority of the site is in grade 4 (poor) while a small portion is in grade 3 (good) agricultural land  The size of the site will mean the landscape will be affected from development, although the majority of the site is or has been used for mineral extraction.
Proposal	Mixed use development (325.9 ha) comprising: -residential -employment -hotel and conference centre -schools -open space (both informal and formal) -caravan park
Site	12. North of Leighton

Conclusion	and character of the village and is not considered appropriate.	Score: Amber Proposed allocation in the Development Strategy: No  the site would contribute to the housing needs of Central Bedfordshire The proposed development does not reflect the current scale and character of the village and is not considered appropriate.
Accessibility	The development would not be of sufficient size to support additional bus services Relatively poor access to a variety of locations	There are existing congestion issues on the A5120 going into Houghton Regis and this is likely to be worsened by this development. Sustainable transport access to larger centres (mainly Houghton Regis and Dunstable) is unlikely to represent a realistic option so residents would be reliant on the existing low level services provided in Toddington.  Toddington is relatively close to Harlington Train Station  The development would not be of sufficient size to support additional bus services  Relatively poor access to Houghton Regis/Dunstable/Luton. Some services within Toddington itself.
Suitability	would appear somewhat detached from the main part of Barton-le-Clay.	-This site would provide a mixed use extension to the village of ToddingtonThe scale of the proposed development will contribute to the housing needs of Central Bedfordshire, and is likely to deliver facilities and servicesToddington is categorised as a minor scategorised as a minor scategorised as a minor scategorised as a minor scategorised as a minor contrent scale and the proposed development does not reflect the current scale and character of the village and is not considered appropriate.
Deliverability		The site is being promoted by a developer on behalf of two owners. These two owners have a development agreement in place.  The site is deliverable in the plan period. The development to development to commence with another 5-10 years for development to compended. This would be competition at the end of the plan period.
Green Belt/ coalescence issues		The site is located within the Green Belt. The site is located in the open countryside south of the existing settlement.  The site proposes leisure and recreational uses although it doesn't go into detail what this will be, e.g. country park.
Constraints	plan this area will be used for open space and woodland.	The whole of the site is in grade 3 (good) agricultural land.  The site is in the open county side that borders the southern boundary of Toddington. Concern about prominence of the development.
Proposal		Mixed use development (23.37ha) comprising: -residential -leisure -recreation
Site		15. Crowbush Farm,

Conclusion	Score: Yellow Proposed allocation in the Development Strategy: No Whilst this site has not been selected for allocation within the Development Strategy because:  the scale of the proposed development could make a significant contribution to meeting the housing needs of Central Bedfordshire, and deliver a significant number of facilities and services the sites are a considerable distance from the main facilities and services in Sandy. Land to the east of Sandy is separated from the town by the railway line, and is therefore not well connected. Existing infrastructure would be unable to support such large scale development
Accessibility	Sandy train station is relatively close Development could support a new bus route Close to Sandy town centre
Suitability	-The sites in combination would provide a large extension to the north and east of SandyThe scale of the proposed development would make a significant contribution to meeting the housing needs of Central Bedfordshire, and deliver a significant number of facilities and servicesBoth sites would be a considerable distance from the main facilities and services in SandyLand to the east of Sandy is separated from the town by the railway line, and is therefore not well connected.
Deliverability	These sites are being promoted by a developer on behalf of the landowner.  The site is deliverable in the plan period. The developer estimates it will take 0-5years for development to commence with another 0-5years for the site to be completed. This would be completition at the beginning to middle of the plan period.
Green Belt/ coalescence issues	These sites are not located in the Green Belt.  The plan makes allocation for employment land, open space and a local centre.
Constraints	On the eastern site a CWS borders south of the site, while there are 2 CWS one to the North and the other to the East. There is also a AGLV to the south of the site.  40% of the site is in grade 2 (very good) with the rest split between 1 (excellent) 3 (good), 4 (poor) and 5 (very poor) agricultural land.  The Northern is in the open countryside but attached to northern part of Sandy and constrained by the A1 in the West. The site is flat with little physical constraints.  The Eastern site is more sensitive. The site is flat with little physical constraints.  The Eastern site is flat with little physical sons a steep slope over looking Sandy and the rest of the valley.  There are issues regarding the CWS on site and adjacent which need to be mitigated against. The Greensand ridge footpath crosses the site.
Proposal	Mixed use Development (80ha) comprising: -2000 dwellings -open space -employment land -local centre
Site	East of Sandy East of Sandy



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# Central Bedfordshire Council Development Strategy: Consultation Statement

# Introduction

# **New Development Strategy for Central Bedfordshire**

Work is being undertaken on a new plan to cover the whole of Central Bedfordshire. The plan, which will be called the Development Strategy, will set out how much development (housing, employment, retail etc) is required and broadly where that development should go. While this work has only just begun, we are keen to hear views on what the plan should contain from an early stage.

This Consultation Statement sets out the work that was carried out for the informal consultation stage and will be updated throughout the various stages of consultation by the Community Involvement Officer (Development Planning Process Team, Development Planning and Housing Strategy).

# **Issues & Options - Informal Consultation Summary**

An informal consultation took place to start initial stakeholder involvement. This started in December 2011 with officer meetings for information gathering.

Following a mail out to over 6,000 residents and stakeholders, there was a notification of the consultation placed on the CBC Website from 14.01.12 - 02.04.12 informing the public about the Development Strategy and also to share the Development Strategy questionnaire with them and invite them to the Workshop Events.

After these events, an update was provided and the slides from the Workshop Events were made available. "Members Briefings" were carried out from March 2012.

A questionnaire with an accompanying "Issues and Options Discussion Paper" was made available on the Central Bedfordshire Council website and hard copies available at the key CBC Customer Services Centres.

# **Development Management Workshops**

The Development Management workshops for CBC staff were held over two sessions on the 16<sup>th</sup> December 2011 and the 5<sup>th</sup> January 2012. The workshops were attended by a range of Development Management and Development Plan officers.

These workshops were held to assess the existing Development Management policies and to consider which policies would be appropriate to include within the Development Strategy. The group considered which policies were used, which were no longer consistent with national policy and where policies would need to be produced in order to avoid any policy gaps. The results of the workshop were then collated by officers and presented to Development Plan officers, in order to begin work on policies for the Development Strategy.

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The Members Briefings were held on the 1<sup>st</sup> March, 9<sup>th</sup> March and 4<sup>th</sup> April 2012. These meetings served as an introduction to the Development Strategy and covered discussions on Housing, Employment, Infrastructure, Environment and Climate Change and other topics. On the 4<sup>th</sup> April, a presentation was given to show the initial findings and information gained from the Development Strategy Workshops held in March.

# **Development Strategy Questionnaire**

#### **Questionnaire & Responses**

Notification of the questionnaire and the workshop events was sent out by email or letter to all of CBC's residents on the LDF mailing lists and CBC's Statutory Consultees (depending on their preferred method of contact), it was posted on the CBC's website (**Appendix A**) and a copy of the letter can be found as **Appendix B**.

The Statutory Consultees includes neighbouring authorities, the water companies, the Police and Fire services and the NHS. A full list of our Statutory Consultees is shown as **Appendix C.** 

CBC Customer Centres and CBC Libraries were also notified and hard copies of the Questionnaire and Issues & Options Paper were made available there for residents to view upon request. A copy of their letter/email can be found as **Appendix D**.

#### **CBC Customer Centres**

Priory House	Technology House
Monks Walk, Chicksands, Shefford,	Ampthill Road, Bedford, MK42 9QQ
Bedfordshire, SG17 5TQ	
Watling House	
Dunstable, High Street North, Dunstable, Bedfordshire, LU6 1LF	

The questionnaire consisted of 16 questions covering issues such as housing and job targets, the Green Belt and Visions and Objectives and can be found as **Appendix E**. To help assist with the completion of the questionnaire, there was an Issues and Options Discussion Paper which can be viewed as **Appendix F**.

Approximately 414 questionnaires were completed and returned using the Freepost Address provided. The majority of those (299) described themselves as Central Bedfordshire residents.

As well as making the questionnaires available online on the website and at the key Council Customer Service Centres, the questionnaires were also made available at the Development Strategy Workshops to help capture as many views as possible.

These questionnaires were then evaluated by the CBC Communications Team and the Headline Results were presented to Central Bedfordshire Members along with a brief summary of the Workshops. Along with questionnaire, some additional comments were received and these have been included in this report, along with the Headline Results as **Appendix G.** 

As the questionnaires came in and started to be evaluated, it was noted that the younger population of Central Bedfordshire were not getting involved with the questionnaire.

Central Bedfordshire Youth Parliament (CBYP) has been in place since 2009 and support the objectives within the Central Bedfordshire Children and Young People Plan, and where appropriate will help to deliver on it, especially the commitment to 'increase the participation of children, young people and parents in decision-making and empower them to become more active citizens.

A Planning Officer and Community Involvement Officer attended one of their meetings at Houghton Regis Community Centre on the 14<sup>th</sup> February 2012. This was the Development Planning Team's first introduction to the Youth Parliament. A presentation on the Development Strategy was given and then a description of the questionnaire and how to fill it in. Copies of the questionnaire were then left with the CBYP to fill in and to distribute within their local schools. As a direct result of this, 14 questionnaires from CBYP were received and helped to reflect the views of the younger population of Central Bedfordshire.

# **Development Strategy Workshops**

#### Format & Structure

The workshops were advertised in a letter/email which went out to the Statutory Consultees and the CBC residents. The letter gave description of the events, including the dates and venues. In the hope of involving as many residents as possible, the workshops were held across four dates using two different venues:

1<sup>st</sup> March 2012 - Watling House, Dunstable

6<sup>th</sup> March 2012 - Watling House, Dunstable

8<sup>th</sup> March 2012 - Priory House, Chicksands

14th March 2012 - Priory House, Chicksands

All of the events followed the same structure and the Agenda can be viewed here:

18:00 – 18:30: Arrival & Refreshments

18:30 – 19:15: Development Strategy overview (Council Chamber)

- Introduction & Context
- Executive Member View
- Key issues, themes, challenges
- Timetable, progress, consultation

19:15 – 20:15: Workshops

#### Themes:

- Vision & Objectives
- Housing & employment provision
- Distribution of Development
- Development and infrastructure
- Environmental challenges and priorities

20:15 - 20:45: Feedback

20: 45: Close

Across the four events, there were approximately 180 attendees.

The attendees consisted of:

- Central Bedfordshire Members and Councillors
- Central Bedfordshire residents
- Landowners
- Town and Parish Councils
- Developers and Planning agents

The highest attended event was Thursday 8<sup>th</sup> March at Priory House.

#### **Activities**

#### **Graffiti Walls**

During the events, there were activities for the attendees to partake in. There were two Graffiti Walls, one with a structured question and one left blank for free comments.

Here are a few comments from the Graffiti Walls:

- "Housing to reflect local needs"
- "No building on the Green Belt"
- "Has to be fit for purpose"
- "Control of traffic and congestion"
- "Listen to the views of the local people living in the area"

(After evaluating the comments gained from both Walls, it would be advisable to use structured questions on the Walls to help the attendees leave productive comments at future events. It would also be advisable to have the Walls manned where possible.)

#### **Vision & Objective Chart**

There was a Vision & Objective Chart which used Question 2 from the Development Strategy Questionnaire. This involved attendees voting for their most important issues surrounding the Development Strategy.

The three top issues were:

- 1) Meeting the Housing Needs of All
- 2) Protecting the Green Belt
- 3) Protecting the natural environment and enhancing our green spaces

The Chart gained positive comments from the Feedback Surveys received after the events in that it helped people to prioritise their issues.

#### **Central Bedfordshire Map**

There was a Central Bedfordshire Map that attendees could show the area that they were from by putting a coloured dot on the map. After the events, this map helped with the evaluation process to show where attendees were from and which areas may have been underrepresented.

#### **Voting Tubes**

At the end of each event, the attendees were asked to answer questions regarding housing and job numbers using a "Voting Tubes" system. Feedback so far indicates that residents enjoyed this interactive activity. The results from the "Voting Tubes" across the four events showed that the majority of people would like a Medium/High Housing growth target and a Medium Jobs growth target.

Overall, the activities were seen in the feedback as a productive and interactive way to collect comments and provoke constructive discussions.

A further breakdown of all of the activities can be found in the "Development Strategy Workshops Feedback Report" (Appendix H) and photographs from the Workshops can be found as Appendix I.

# **Presentation & Workshops**

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The presentation was given by officers of the Development Planning and Housing Strategy Team and showed the work previously carried out, the timeline for the Development Strategy, evidence studies and the current work going on.

Feedback collected after the events show that the presentation was well received and helped to inform the following workshops.

Copies of the presentation slides can be found on the Strategic Planning Page on the Councils website:

http://www.centralbedfordshire.gov.uk/planning/strategic-planning/consultation-and-news.aspx.

The Workshop Discussion Groups split the attendees into mixed groups, making sure to include a fair mixture of residents, Councillors and developers/planning agents. Each could bring their different views and knowledge to the table. There was a facilitator for each workshop group to give set topics to discuss such as "Distribution of Development" and also guide any thoughts arising from the presentation.

Some of the comments raised during the workshops were:

- "The development strategy should look at small to medium sized sites e.g 50 to 100 dwellings could be a valuable addition to existing communities without over shadowing them.
- "Housing should be provided for a wide range of needs. From housing for older people with complex needs through to people in need of affordable housing, the development strategy should plan to meet various needs"
- "We need to attract new businesses to the area"
- "Local needs must be met first"
- "Creating Communities"
- "We should make Central Bedfordshire an attractive place to live, so people want to live here, not just have to"
- "Affordable housing needs to be spread around developments, not grouped together"
- "Retail and health facilities need to accompany development"
- "Addressing and mitigating climate change is a key priority"
- "Need to look at and consider what sort of employment should be provided. Warehousing takes up a lot of land but provides fewer jobs. Need to provide a higher skilled workforce to attract higher paid employment"

Further comments can be found in the Development Strategy Workshops Feedback Report at Appendix H.

# Next Steps Agenda Item 11 Development Strategy Timetable Page 44

- 1) October 2011 April 2012: Evidence gathering
- 2) Feb/March 2012: Initial stakeholder involvement
- 3) June 2012: Informal consultation on draft plan (six weeks)
- 4) December 2012: Formal publication Stage (six weeks for representations to be made)
- 5) May 2013: Submission to Secretary of State
- 6) September 2013: Examination hearing sessions
- 7) December 2013: Draft Inspector's report
- 8) February 2014: Adoption

At the time of writing this Consultation Statement, Stages 1 and 2 have been completed. Stage 2 being covered by the above mentioned questionnaire and four Development Strategy Workshops.

Stage 3, consultation on the Draft Development Strategy will commence on Wednesday 20th June 2012. The document will be available at the key CBC Customer Services Centres along with the Sustainability Appraisal. Electronic copies of the document and all accompanying technical documents will be available on the website.

Running alongside the Development Strategy will be the Draft Statement of Community Involvement (**Appendix J**). There will be reference to this in the mail out (see "Consultation on the Draft Development Strategy" – **Appendix K**) and the statutory notices. A draft will be available to view on the website and at CBC Customer Service Centres (as mentioned above). Comments can be taken on this document and the closing date will be the same as for the Development Strategy (Wednesday 8<sup>th</sup> August).

There will be a statutory notice in the local newspapers. The Strategic Planning webpage on Central Bedfordshire Council website will give guidance on how to make comments and where to send them to.

Internal methods will also be used to catch the knowledge of other Central Bedfordshire teams and officers such as Development Management and Transport Strategy. This will be done using meetings, the Intranet, the "Sustainable Communities Newsletter", the "Members Bulletin" and "Be Inspired".

There will be a "Launch Event" on Wednesday 13<sup>th</sup> June. This event will be to present the Draft Development Strategy and to show the work that has gone into it so far. The venue has been booked as Priory House, Chicksands due to this being the most popular location for the Workshops and also due to its flexibility for high numbers of attendees.

After the six week consultation period, the comments received will be considered and relevant amendments will be made ready for Stage 4 of the Development Strategy Timeline. At this stage, this Consultation Statement will be updated to show the results of the consultation on the draft Strategy.

#### Appendices:

Appendix A - Development Strategy CBC Website Notifications

Appendix B - Letters sent to the North and South of Central Bedfordshire

Appendix C - List of Statutory Consultees

Appendix D - Letter/Email sent to CBC Customer Centres & CBC Libraries

Appendix E - Development Strategy Questionnaire

Appendix F – Development Strategy Issues & Options Discussion Paper

Appendix G – Development Strategy Questionnaire Headline Report

Appendix H - Development Strategy Workshops Feedback Report

Appendix I – Photographs from the Development Strategy Workshops

Appendix J - Draft Statement of Community Involvement

Appendix K - Development Strategy Consultation on the Draft Plan Letter

# **Development Strategy Consultation Statement**

# **Appendices:**

- Appendix A Development Strategy CBC Website Notifications
- Appendix B Letters sent to the North and South of Central Bedfordshire
- Appendix C List of Statutory Consultees
- Appendix D Letter/Email sent to CBC Customer Centres & CBC Libraries
- Appendix E Development Strategy Questionnaire
- Appendix F Development Strategy Issues & Options Discussion Paper
- Appendix G Development Strategy Questionnaire Headline Report & Additional Comments Received
- Appendix H Development Strategy Workshops Feedback Report
- Appendix I Photographs from the Development Strategy Workshops
- Appendix J Draft Statement of Community Involvement
- Appendix K Development Strategy Consultation on the Draft Plan Letter



# Comments received through questionnaire, summary and response

A total of 414 responses to the questionnaire were received. This paper summarises these comments and identifies how the responses have been taken into account.

# Respondents

#### Q1.Are your responding as a: (please pick one)

		Frequency	Percent	Valid Percent
Centra	I Bedfordshire resident	299	72	73
Comm	unity/ Voluntary organisation	17	4	4
Lando	wner/developer/agent	39	9	10
Local E	Business	3	1	1
Town/F	Parish Council	14	3	3
Other (	please specify)	36	9	9
Total		408	99	100
Missin	9	6	1	
Total		414	100	

# Commentary

The vast majority of those who responded were Central Bedfordshire residents. A number of landowners, developers and agents also responded.

Q1a. Other respondent type specified

Q1a. Other respondent type specified		
	Count	Percent
Central Bedfordshire Youth Parliament	14	3
Resident	2	0.5
A resident on the boundary North side Luton/ C /Beds	1	0.2
ARLESEY RESIDENTS ASSOCIATION	1	0.2
CBC RESIDENT AND VOLUNTARY ORG	1	0.2
Concerned north Harpenden resident	1	0.2
Conservation Charity	1	0.2
Council Officer	1	0.2
Government agency	1	0.2
Harpenden Hertfordshire resident	1	0.2
Higher Education Institution (Cranfield University)	1	0.2
Interested OAP	1	0.2

Luton Resident	1	0.2
North Luton Resident	1	0.2
Planning Consultant	1	0.2
RC Priest with Geography degree	1	0.2
Representing Rose Lane Gospel Trust Biggleswade	1	0.2
Representing the residents of Queen Elizabeth Close, Shefford	1	0.2
Statutory consultee	1	0.2
Stopsley Resident	1	0.2
The Leighton Buzzard Society	1	0.2

# Commentary

Of those respondents who were categorised as 'Other' in Q1, 14 were members of the Central Bedfordshire Youth Parliament. There were a range of other respondents as listed above.

# **Vision and Objectives**

Q2. What do you consider to be the important issues that should be reflected in the Vision and Objectives

	1 - most in	nportant	2 - secon import		3 - third most important		Total	
	Frequency	Valid Percent	Frequency	Valid Percent	Frequency	Valid Percent	Frequency	Valid Percent
Protecting the Green Belt *	128	57	62	28	34	15	224	100
Protecting the natural environment and enhancing our green spaces	71	38	80	42	38	20	189	100
Meeting the housing needs of all	64	56	28	25	22	19	114	100
Economic and jobs growth - increasing local jobs and economic prosperity of the area	50	33	69	46	32	21	151	100
Ensuring everyone has access to healthcare	39	39	29	29	32	32	100	100
Ensuring everyone has access to education	32	31	35	34	35	34	102	100
Improved transportation links	16	24	25	37	27	40	68	100
Attractive, well designed places	10	9	20	19	78	72	108	100
Reducing carbon emissions and adapting to climate change	10	18	17	31	28	51	55	100
Ensuring everyone has access to public transportation	9	12	28	38	37	50	74	100
Retaining a skilled workforce, reducing out commuting	7	14	15	31	27	55	49	100
Providing sufficient shops and leisure facilities to meet needs	4	8	22	46	22	46	48	100
Other	12	60	4	20	4	20	20	100

#### Commentary

A large percentage of people selected the following issues as their first or second priorities:

- Meeting the housing needs of all
- Economic and jobs growth increasing local jobs and economic prosperity of the area
- Protecting Green Belt
- Protecting the natural environment and enhancing our green spaces

The draft Development Strategy proposes significant housing and jobs growth up to 2031 which reflects the first two issues raised by respondents. In proposing housing growth, development on suitable brownfield sites has been maximised. However, some Green Belt land is required for development in strategic locations. The Strategy does contain policies which acknowledges the importance of Green Belt and seeks to maintain it wherever possible.

An important aspect of the strategy is to protect the natural environment. It contains a number of policies which seek to protect, and where possible enhance, areas of environmental importance. Provision of additional green spaces is also an integral part of the proposals for strategic developments.

## **Housing Targets**

Q4.Which housing growth option do you think is the most suitable for the future of Central Bedfordshire?

		Frequency	Percent	Valid Percent
	High	32	8	8
	Medium/high	61	15	15
	Low/medium	143	35	35
	Low	171	41	42
	Total	407	98	100
	Missing	7	2	
To	otal	414	100	

#### Q5.Why have you selected this housing growth target?

	Frequency	Percent
Will have less impact on the countryside	271	65
Would place less strain on existing infrastructure and services	264	64
Will not require more land to be identified	227	55
Our towns and villages do not need to grow	134	32
Will sustain existing services	128	31
It is important to provide enough homes	95	23
Young people will be able to stay in the area	93	22
Will attract investment to the area	86	21
More affordable housing will be provided	85	21
Will provide new infrastructure	75	18
It will help villages and towns to grow	60	14
Will keep house prices low	39	9
Other	19	5

#### Commentary

The vast majority of respondents indicated that they felt a low or low/medium housing target would be most suitable. This response was contrary to peoples responses at the workshops where a larger number of people suggested that a medium/high target would be most suitable.

The National Planning Policy Framework clearly indicates that housing and jobs targets should be supported by a robust evidence base. In the case of Central Bedfordshire, population projections suggest that a target that falls between the medium/high and low/medium options is most appropriate. The Sustainability Appraisal also concludes that this is the most suitable approach.

Respondents largely indicated that their support for a lower figure was due to a desire to protect the countryside and to place less strain on existing infrastructure and services. The draft Strategy does contain policies that protect the countryside from inappropriate development. Large scale strategic sites have been selected as they will be of a sufficient size to pay for and provide new infrastructure and services in order to lessen the strain on that that exists already. Allocating large strategic sites also increases the ability to protect the rest of the countryside and Green Belt.

### **Job Targets**

Q7.Please select which jobs growth option you think is most suitable for the future of Central Bedfordshire.				
	Frequency	Percent	Valid Percent	
High	71	17	18	
Medium	194	47	48	
Low	139	34	34	
Total	404	98	100	
Missing	10	2		
Total	414	100		

#### Q8. Why have you selected this jobs growth target?

	Frequency	Percent	Valid Percent
Will have less impact on the countryside	207	50	50
No further land needs to be identified	152	37	37
Allows the economy to grow and provide more jobs	139	34	34
Would reduce out-commuting	131	32	32
Provides choice and flexibility	98	24	24
Other	16	4	4

## Commentary

The highest number of respondents sought to have a medium level jobs target included within the draft Development Strategy. This scale of employment growth is supported by the evidence base, including the Sustainability Appraisal. A medium jobs target has therefore been identified within the Strategy.

# **Distribution of Development - Housing**

Q10.If new homes are needed, where should they be located?

	Frequency	Percent	Valid Percent
Vacant plots or redevelopment opportunities in towns and villages	223	54	56
Small sites on the edge of towns and villages	69	17	17
Large sites on the edge of towns	54	13	14
In a new town or village (such as Wixams)	49	12	12
In the countryside	3	1	1
Total	398	96	100
Missing	16	4	

Total	414	100	
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Q11. Why have you selected this option as your most preferred location for new homes?

	Frequency	Percent	Valid Percent
Would have less impact on the countryside	273	66	66
Maintains the rural area	268	65	65
Would utilise brownfield sites	222	54	54
ls a more sustainable option	201	49	49
Would not burden existing towns and villages	185	45	45
Prevents overcrowding of existing settlements	124	30	30
Allows existing towns and villages to grow	98	24	24
Provides a balance of homes and jobs across the district	95	23	23
Creates opportunities to improve services and facilities	93	22	22
Would concentrate development in one or a few areas	69	17	17
Other	21	5	5

# Commentary

The vast majority of respondents indicated that they think new development should be focused on vacant plots within existing settlements. The majority of new development proposed by the Development Strategy will take place on brownfield sites within existing settlements. However, in order to meet the identified housing need in the area, large strategic urban extensions have been identified for development on the edge of settlements. While proceeding with this option doesn't quite reflect the views of those who responded, the evidence does suggest that a small number of larger sites is more sustainable than a larger number of small sites. This is due to the fact that larger sites are more able to contribute financially to the provision of additional infrastructure and services which are required in order to support new development.

### **Distribution of Development – Employment**

Q12.If new employment sites are needed where should they be located?

	Frequency	Percent	Valid Percent
Continue expanding our existing employment sites	138	33	35
Close to major road networks	126	30	32
Within existing towns and villages Within or adjacent to new housing development	76 45	18 11	20 12
Within the countryside	4	1	1
Total	389	94	100
Missing	25	6	
Total	414	100	

Q13. Why have you selected this option as your most preferred location for new employment sites?.

	Frequency	Percent	Valid Percent
Would have less impact on the countryside	268	65	65
Location would be more attractive to businesses	203	49	49
Will reduce need to travel by car	150	36	36
Will provide better access for lorries	136	33	33
Would boost rural economy	56	14	14
Other	26	6	6

### Commentary

The majority of respondents considered that the focus should be on expanding existing sites and locating any new sites close to major road networks. This reflects the strategy that has been taken forward in the draft Development Strategy. Where new employment land has been proposed, the vast majority is located close to the M1, either to the north of Luton and Houghton Regis, or at Flitwick.

### **Distribution of Development - General**

Q14. When looking for suitable development sites what do you think are the most important factors?

are the most important lactors.								
	1 - most ir	nportant	2 - second most important		3 - third most important		Total	
	Frequency	Valid Percent	Frequency	Valid Percent	Frequency	Valid Percent	Frequency	Valid Percent
Whether the land is brownfield or greenfield	128	60	39	18	46	22	213	100
Impact on the landscape	70	32	92	42	56	26	218	100
Capacity of existing services	55	40	46	33	38	27	139	100
Access to existing services, i.e. schools, GPs, post office etc	45	35	44	34	40	31	129	100
Relation to existing settlements	43	34	36	29	47	37	126	100
Impact on wildlife	39	30	45	35	45	35	129	100
Access to the road and rail network	19	23	37	45	27	33	83	100
Contributions and benefits towards community infrastructure	18	27	20	30	29	43	67	100
Access to public transport	14	18	37	47	27	35	78	100
Distance from employment centres	10	18	20	36	25	45	55	100
Distance to shops	7	33	5	24	9	43	21	100
Other	8	44	4	22	6	33	18	100

# Commentary

The factor that respondents most commonly felt should be taken into account when looking for sites was whether the site is brownfield or greenfield. The vast majority of development within the Development Strategy is to be located on brownfield land. However, in order to provide for local housing need, some development on greenfield land is necessary.

Q15.Do you think we should review the Green Belt in order to identify sustainable locations for development?

	Frequency	Percent	Valid Percent
No	290	70	73
Yes	108	26	27
Total	398	96	100
Missing	16	4	
Total	414	100	

#### Commentary

The vast majority of respondents suggested that they do not wish to see reviews to the Green Belt. The draft Development Strategy does seek to review the Green Belt in strategic locations. This is necessary in order to meet the identified housing target which has been derived from the evidence base.

# Q17.Are you

	Frequency	Percent	Valid Percent
Male	237	57	62
Female	143	35	38
Total	380	92	100
Missing	34	8	
Total	414	100	

### Q18.What is your age?

	Frequency	Percent	Valid Percent
16-19 yrs	4	1	1
20-29 yrs	7	2	2
30-44 yrs	66	16	17
45-59 yrs	109	26	28
60-64 yrs	64	15	17
65-74 yrs	80	19	21
75 yrs +	43	10	11
Under 16	10	2	3
Total	383	93	100
Missing	31	7	
Total	414	100	

# Q19.Do you consider yourself to be disabled?

	Frequency	Percent	Valid Percent
No	350	85	93
Yes	25	6	7
Total	375	91	100
Missing	39	9	
Total	414	100	

# Q20.To which of these groups do you consider you belong?

	Frequency	Percent	Valid Percent
White British	350	85	95
Mixed	4	1	1
Black or Black British	2	0	1
Other Ethnic group	14	3	4
Total	370	89	100
Missing	44	11	
Total	414	100	

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# <u>Comments Received During the Workshop Group Discussions, summary and response</u>

#### **Vision and Objectives**

- The protection of people should play a role in the Development Strategy and Sustainability Appraisal.
- The type of environment that we want to create needs to be a consideration, not just a focus on housing and jobs.
- We must protect what we have which is good.
- Regenerate areas which need regenerating.
- Central Beds is a made up name and has a disparate character for which it is difficult to create or suggest a single vision for.
- The vision should be for local areas such as towns or groups of villages rather than for the whole area
- What is the role of Dunstable Town Centre? Just general shopping or should it develop a niche retail/café culture?
- There is a need for realism about actual jobs growth and prospects.
- Local Towns and villages should be respected, it is important to retain local distinctiveness and where possible to enhance it.
- It is important to get rid of the north south mentality and consider the district as a whole entity rather than being divided north and south.
- Why does the south area have more housing when it is also more heavily constrained by the Green Belt for example?
- Dunstable is under threat from Luton.
- The Natural Environment should be improved.
- Transport links are opposed where they may encourage development in unsuitable areas and harm the local environment.
- A balance between homes and jobs is an essential part of the vision
- We need a jobs-led approach to calculating housing requirements.
- We should make Central Bedfordshire an attractive place to live, so people want to live here, not just have to.
- Agricultural food production is a major element of Central Bedfordshire, we should reinforce this.
- Water supply will be restricted in future impact on growth?
- Importance of transport routes to Central Bedfordshire (M1, A1, railway etc) impact on migration and commuting patterns
- Important to have an awareness of neighbouring areas as large developments just across the district boundary can have a significant impact
- Concern expressed that sufficient infrastructure should be supplied when developments are built and that infrastructure provision should be better prioritised.
- Agreed that houses should be matched to jobs and should be located in the same place in order to reduce out-commuting
- How will Luton affect the overall development strategy? Will Luton try to alter boundaries and 'take over' Dunstable, HR etc?
- Promote Sustainable jobs and growth.
- Balance jobs and housing.
- The plan should be flexible enough to cope with different levels of growth.
- Balance North and South area development make sure it is not biased to the South.
- Optimise use of existing infrastructure.
- Do not overload the existing centres.
- Consider 'diluting' the development by spreading it round a variety of settlements in proportion to their size and available facilities.

#### Main issues raised:

Environment is an important issue, including water, agricultural land, regeneration, the natural environment

Agreed, the Development Strategy will have an Environmental Enhancement Strategy and policies to protect and support the environment

Local towns and villages need to be respected, with development being spread across them, with infrastructure to be provided and not overloaded The Development Strategy will provide for strategic allocations whilst there are some allocations for smaller towns proposed in the existing Site Allocations Document across the north area. This means that development will be spread across different sized towns. Infrastructure will be provided alongside any development.

Jobs and housing need to be balanced/the Development Strategy should be jobs-led

The principle of planning for both homes and jobs is accepted and Central Bedfordshire Council will continue to strive through its policies to ensure that homes and jobs are properly planned for.

The North and South areas need to be considered together with a balance in development

The Council's approach to development will be informed by the principle that, in general, the largest settlements with the highest level of existing facilities and transport links offer the most sustainable options for development. This is consistent with the guidance set out in the National Planning Policy Framework. In addition, where appropriate to the scale of a settlement, large sites often offer greater opportunity for mixed-use development, which may assist in retaining and attracting employment opportunities to the area and creating more sustainable transport patterns. Larger sites can also bring forward more significant infrastructure improvements and mitigation against adverse impacts through developer contributions/planning obligations.

#### Importance of transport

Transport, both in infrastructure terms and sustainable methods of transport will be a major consideration in the Development Strategy to work in tandem with the Local Transport Plan.

Awareness of cross-boundary issues

The Localism Act requires the Council to demonstrate a 'Duty to Cooperate' with its neighbours. Working with partner authorities has long been in place and will continue to be done, although for Luton will be a different relationship in comparison to the formal joint working arrangement previously in place.

#### **Housing Provision**

- There was concern over the figure provided for population growth of 45,000 and then only 9,400 would be economically active
- Understanding by all that this area will always be transient.
- Would like some background on the housing numbers.
- The total housing numbers are an issue and a strong doubt about the evidence which underpins the housing and household forecasts was expressed.
- Natural growth was considered important, which means catering for the growth of the existing population and not so much for the population that wants to move into the district.
- The suggested growth for each village was 10% to 15% even for villages in the Green Belt.
- Lifetime homes. We need to consider ageing population. Demand for small flats is falling and demand for 'suburban' homes with gardens is growing. Should be a 'positive planning

Agenda Item requirement'.

- Social and affordable housing are important to meet local need.
- Infrastructure is an issue particularly if new housing numbers are high, there is also an existing infrastructure deficit as the result of past development.
- Even in the Green Belt some land should be released for family housing to allow local people to move up the housing ladder.
- If fewer houses are built then there should be less in migration allowed and only local need should be met, but with fewer houses prices could go up.
- Quality of Housing In addition to achieving high quality construction, developments should be aware of environmental issues such as the provision of green and open space. It was considered that these factors would make the growth more sustainable in the longer term.
- Immigration we need to manage it. It is a Luton issue so Luton should deal with it.
- Housing must go hand-in-hand with Jobs Further than the fact that the construction of the homes will generate jobs themselves; the group discussed the Business park model of job generation. An example of Capability Green in Luton was given as an example.
- Responsible Growth It was felt that under the duty to co-operate we should be responsible about providing housing for our neighbouring authorities. However the point referred to the need for the Development Strategy to look across wider Housing & Employment markets rather than just geographical boundaries.
- Meeting Housing Needs It was felt that housing should be provided for a wide range of needs. From housing for older people with complex needs through to people in need of affordable housing, the development strategy should be planning to meet all these various needs.
- Migration: why is it our starting point? Why should we take Luton's growth when Luton wanted to go it alone – walked away from joint working?
- Why do people move here? Quality? If we build too much we will destroy the quality people move here for.
- Why should migration figure be so high? How does it square with Localism? Local housing for local needs – not Luton's. Local needs vs in-migration.
- Should we stop in-migration? How? It will ruin a green environment if we don't. Where will Luton's out-migration go?
- Should housing figure be so high? There are a lot of undelivered commitments due to the recession so growth should be realistic - i.e. lower.
- What kind of housing will be delivered? What are people's aspirations?
- We need the right type of affordable housing.
- Density of housing should be regulated as part of the strategy
- Growth should be primarily focussed in the South Housing needs from Luton, Airport Expansion and the lack of land availability in Luton all drive this point.
- Larger villages & towns also need growth
- We need to maintain larger villages across CBC
- New housing design should be of a high quality and not just house builders standard housing types and designs.
- Do not cater for migration.
- Infrastructure first (all new housing should have access to schools)
- In the south area the towns often have grid lock.
- There needs to be a balance between housing, jobs, and services, which does not exist everywhere at present.
- To take pressure of the Green Belt area of the district and take advantage of a good location with good access and fewer constraints a new town should be considered south of Bedford to take a large proportion of the districts growth.
- Supply and demand are house prices affected by supply?
- Need affordable housing for young people, but what is affordable housing?
- Difficulties in integrating commuters into local communities. Schools can often play an important part in community life and integration.
- What impact will home working have on the homes/jobs requirements?
- We need more affordable homes, particularly shared ownership.
- Rural exceptions schemes can be useful in meeting need.
- Affordable housing needs to be spread around developments, not grouped together.
- Discussion about Neighbourhood Plan. Conformity with Development Plan what does this mean in practice? What should the Development Strategy say about Neighbourhood Plans?
- If we constrict growth house prices will rise which local people will be even less able to afford. Will

just attract Londoners.

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- Providing homes in small developments in rural areas can be easier to assimilate tha Page 58 urban extensions.
- If we provide more houses they will only cater for the commuter market that while living in Central Bedfordshire, work away and do not contribute as much to the local economy
- It was considered that by opting for higher growth, housing could be supplied throughout the plan period as larger developments are phased.
- More housing potentially could deliver better infrastructure.
- It was considered that the strategic sites (1000+ homes) and smaller Neighbourhood Plan sites (200 homes or less) would not offer the range of sites to deliver housing across the plan period. Some natural growth to all settlement preferred.
- Focus on the needs of Central Beds.
- Need to balance jobs and housing and you need jobs near housing.
- If you do not do this you just increase commuting.
- By having stations in developments this is likely to encourage people to commute out rather than have a balanced community with people able to live and work locally.
- Consider having main allocations and then reserve allocations if more development is needed.
- Some development is needed in the villages to help keep them 'alive'. They need mixed housing to produce balanced communities. Quality design and small scale.
- Social housing. We need balanced and mixed communities. What are our selection procedures?
- Cranfield University appropriate housing needed nearby.
- What is the purpose of the new housing? Who are they for? What are we considering a small number of large sites or smaller sites spread about? What about a New Town?
- Providing affordable housing
- More affordable housing and preference should be given to local people
- Parish Councils should have greater power to decide who occupies affordable homes
- Some housing in villages in order to meet local needs
- More housing provision for the elderly
- Provide homes that can be adapted to lifetime homes standards.
- Cheaper housing
- Implement good quality design standards within new developments and learn from the mistakes of the Sandhills Estate in Leighton Buzzard.

## Summary & Response

#### Main Issues Raised:

There needs to be a balance between jobs and housing
The Development Strategy will seek to ensure that there is a balance between
the number of homes that are provided and the number of new jobs the area
can create. Achieving the right balance between these two types of
development, with the desire to enhance the local environment will result in
sustainable communities which will benefit existing and future residents. The
Strategy will identify strategic allocations for both housing and employment to
ensure the creation of sustainable communities.

What is the justification for the housing numbers? The evidence for this will be contained in the Housing topic paper.

There needs to be a good mix of housing including affordable housing and cheaper market housing,

There will be policies proposed which seek to deliver a mix of housing including affordable rented and intermediate tenure properties as well as a variety of sizes guided by the Strategic Housing Market Assessment. Rural exception housing sites may also be permitted.

There needs to be a range of site sizes and locations.

It is expected that smaller scale developments will be delivered throughned ltem 11 neighbourhood plans which will be developed in the area. If this is not Page 59 forthcoming a Site Allocations document may be produced in the future. The Site Allocations Document in the north area allocates a range of sizes and locations of sites.

New housing should be of a high quality.

There will be a policy on High Quality Development and this seeks to achieve high quality for all development.

#### **Employment Provision**

- It was felt that there is an imbalance between employment opportunities and jobs requirements.
- Growth was not going to where the jobs are.
- Needed to be an understanding of what was on offer and looking at neighbouring areas, such as Milton Keynes, to understand why they are successful.
- In Luton and Dunstable there is primarily a problem with transport and land availability.
- The availability of housing and type of housing available is also an issue and there needs to be a range of housing on offer to meet the needs of different types of employees.
- Tourism needs to be recognised as an important sector and the infrastructure required to support this sector needs to be noted. It is not sure if CBC was undertaking a Tourism Strategy.
- Existing firms are not necessarily the types of firms you will need in the future and may not grow to create the jobs needed.
- We should seek to achieve full employment.
- We also need to attract new business to the area.
- There are current problems with slow internet speeds and this needs to improve to aid business development.
- Jobs need to be balanced with housing we need to be jobs led, not housing led not sustainable.
- Industry and jobs what are we looking for? Prefer high quality manufacturing, R & D. Need high quality technology parks and housing to match.
- Too much office space CBC is not an attractive location. We need to consider the impact of home-working on the demand for office space.
- Need to consider the impact of new technology on employment patterns and practices broadband, home-working etc.
- The Strategy must be employment led and that needs to be 'quality' employment.
- How does CBC 'market' its 'product'? We need to target specific areas such as high tech.
- Will uncertainty over retirement ages mean a demand for more jobs? What kind of jobs?
- Transport in all forms is important to economic development.
- We should encourage small to medium sized businesses.
- There are many benefits for business if they locate in the area, such as being near Milton Keynes, the M1, Stansted, attractive countryside, Cranfield and good sites, the area should be sold more widely.
- There are employment sites and property which are vacant and have been vacant for a long time we must understand why.
- Out commuting should decrease.
- Jobs & housing need to be delivered hand-in-hand.
- There are a wide range of jobs involved in construction
- Transport links are key to encouraging job growth rail, road, public etc
- Consider Business Parks such as capability Green in Luton
- Potentially consider a business park in Ampthill/Flitwick to encourage economic growth.
- Academics can attract jobs i.e Cranfield University
- Jobs plan for higher jobs growth if Central Bedfordshire can accommodate and deliver the right sites/locations and conditions.
- Over the last 4 years enough sites have been identified.
- Housing and Employment should be tied together.
- The problems seem to be in the south and opportunities in the north.
- Out commuting positive and negative aspects
- Role of farm diversification in job creation

- Jobs and housing growth must be balanced. Can we actually achieve a balanced in Service section 11 manufacturing base has all but gone. Not a sustainable economy if all based in Service section 60 We need to make things again!
- Luton has lots of small offices that seem to be successful, we should do this
- We should focus on major, successful employment areas like Cranfield, Stratton etc
- Warehousing (B8) low jobs numbers but can lead to improvements to road links. Lorries in villages are a problem. Road/rail interchange – would be best at Junction 13, not in Sundon Quarry.
- Leisure/tourism Center Parcs, NIRAH we should do more of this
- A507 corridor (Woburn to Biggleswade) is a national hotspot for football participation, increased demand for training pitches, potential for S106 funding towards this?
- Center Parcs limited spend outside of park boundary.
- Jobs for all should be created not just highly skilled jobs in hi-tech industries
- Smaller start up units are desperately needed
- It was acknowledged that less employment land may be needed due to the ability for people to work from home
- Small workshops linked to housing should be investigated
- We should not limit our vision to planning for employment in a recession but should look forward across the whole twenty year period
- We should create jobs by offering more support to local food production
- Because of the existing employers and a good location go for High Tech Industry.
- There are will be east west rail links on the Oxford Cambridge corridor which create a natural arc which would also include Millbrook, Lockheed Martin and Cranfield.
- Warehousing causes problems particularly with traffic and it does not create many jobs, they just add to traffic problems.
- Must tap the potential of people and firms working in the area as well as the sites that are available.
- The district has a good central location within easy reach of many parts of England and with 2 International Airports nearby.
- Employment sites and premises should be a mix of sites and scales.
- We also need to understand why people work outside the district and then try to ensure that they have the opportunity to work in the district.
- Need to provide jobs to prevent out-commuting by residents and the prevent Central Bedfordshire from becoming a dormitory settlement.
- Need to ensure housing and jobs growth are complementary one should not be significantly higher/lower than the other.
- Should plan for the higher levels of housing and jobs. Need to be aspirational and bold, but without going over the top and over-reaching. Could be difficult to justify at an examination if CBC opt to provide the lower levels of housing and jobs growth, especially given the levels of migration into Central Beds.
- Need to prevent existing employment sites from purposely being run down in order to sell the site
  off for residential use. Need to ensure exiting sites that are good employment sites are kept for
  employment.
- Need to promote ourselves to attract new businesses and investment, but, if Central Bedfordshire
  is 'open for business' does that mean other authorities are 'closed' for business. Is there a
  danger that CBC will end up providing all the jobs and housing because others just don't want too
  or are falling short on? If we are in competition with other local areas in terms of attracting new
  employment, we need to ensure that Central Beds stands out from the crowd.
- Need to look at and consider what sort of employment should be provided. Warehousing takes up a lot of land but provides fewer jobs. Need to provide a higher skilled workforce to attract higher paid employment.
- Providing quality jobs
- Introduce favourable schemes to encourage businesses into the area
- Build upon the strengths of Cranfield and Bedfordshire universities and create high skilled employment hubs around these facilities.
- Provide space for new businesses
- Provide super fast broadband for home working
- Need to accept that out-commuting will occur. Central Beds can't compete with places like Milton Keynes and Luton.
- Look to attract a range of employment across the area but focus on attracting smaller companies

- Provision of employment space in rural areas where appropriate.
- Agenda Item 11 uting. Page 61
- Provide additional employment opportunities in order to reduce out-commuting.
- Need to take advantage of the proximity to Luton Airport in terms of employment
- Provision of broadband in rural areas to facilitate home working
- Reduced rates for companies that employ local people

# Summary & Response

#### Main Issues Raised:

There needs to be a match between housing and jobs provision.

The Development Strategy will seek to ensure that there is a balance between the number of homes that are provided and the number of new jobs the area can create. Achieving the right balance between these two types of development, with the desire to enhance the local environment will result in sustainable communities which will benefit existing and future residents. The Strategy will identify strategic allocations for both housing and employment to ensure the creation of sustainable communities.

Ensure that there is a variety of types of property available
There will be policies seeking to encourage rural diversification as well as
specific strategic allocations for larger sites. The new policy will allow for a
variety of uses and scales of development on these sites. This is intended to
allow businesses to develop grow and prosper.

The good transport links to the area are an advantage but can also cause out commuting

It is intended that new development should be of the highest quality, that is for housing as well as employment buildings which will make the area attractive to people to want to invest and live in the area. Central Bedfordshire is well served by rail and major road links, and the intention of the Development Strategy is to create mixed and balanced sustainable communities with local jobs so people do not have to commute to work. It is also intended that people will also be able to use sustainable modes of transport to get to work or work at home.

Super-fast Broadband should be provided particularly to rural areas. There will be a policy specifically relating to the provision of broadband.

Many of the more detailed issues raised are dealt with in the Council's Economic Development Strategy.

#### **Distribution of Development**

- Urban grain needs to be respected as there is a difference between the villages and urban areas of the larger towns. This would then have an impact on the distribution of growth.
- It is unclear what is going to be allocated in the Development Strategy as Strategic Sites and how the Neighbourhood Plans would work in identifying sites in the villages.
- Green Belt this restricts development especially in the villages but is an attractive feature in the area which needs protection and enhancement.
- Luton growth is restricted in Luton, there has been the recycling of land which has been employment land which then has implications for employment provision. Concern over what will happen when the critical mass in Luton is reached.
- There needs to be a variety of options for the distribution of development, this will also aid deliverability of housing.
- Density what type of place do we want to have? And density needs to be in keeping with the

settlement.

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- Huge estates will lead to problems in the future crime, anti-social behaviour, poor facilities age 62 infrastructure. Must avoid building in problems now.
- There needs to be a provision of local homes to grow the community naturally and by providing homes where people want to live and not to create 'forced communities'.
- Brownfield sites need to be look at and developed before Greenfield sites.
- · Protect the Green Belt.
- There is a limit to the development existing towns can take.
- A new town to take the growth should be considered in an area where there are fewer constraints.
- Local need must be met in the villages.
- The Chiltern AONB is an absolute constraint.
- When considering housing need in the Green belt land should be released around villages to help them achieve a critical mass, this may be up to 200 houses.
- We need to know how much brownfield land we have.
- Villages need to function as villages not just as dormitories.
- Site sensitivity development must be well designed and 'locationally sensitive'.
- 'Site responsiveness' i.e. large sites have a time lag and cannot easily evolve to meet new demands for different housing needs. Much can go wrong over the development period. This needs to be recognised in masterplans and development briefs. Flexibility needed.
- 'All eggs in one basket' too much reliance on big development sites too complex and too much can go wrong.
- The rough indication of what growth for villages in the Green Belt is acceptable is 10%.
- Size of Development It was suggested that the development strategy should look at small to medium sized sites e.g 50 to 100 dwellings could be a valuable addition to existing communities without over shadowing them. The point was about the notion of developing 'smaller and often' across the whole of Central Beds. This was considered more sustainable than just looking at large urban extensions solely in the South. This point linked into point 1 in terms of delivering sustainable development.
- We should generally be accommodating growth where it is needed
- Out commuting needs to be stopped.
- Employment and Housing should be nearby.
- The land in the North part of the district is less constrained.
- Protect Green Belt in the South.
- Consideration should be given to extending the Green Belt in the north.
- Neighbourhood Plans are important.
- Housing should be distributed evenly throughout the north and south
- No distinction was made between the importance of green field land designated as
  Green Belt and that which was not. The group felt both should be protected and that
  suitable brown field sites should be selected in the first instance.
- We do not want any conurbations.
- There should be a mix of scale of sites in different locations and not all concentrated into a relatively few large sites.
- There should be balanced provision, that is a balance between housing and jobs and any growth next to a settlement should be in proportion to that settlement and be well integrated with it.
- It is very important that new development is well integrated and linked to existing settlements and development.
- It is also important to keep a sense of community where people live.
- Smaller incremental growth is easier to absorb.
- A new development of 1000 dwellings or more is too large to integrate well and create a sense of community the strategic level sites should be at 500 or above.
- Consider spreading more development to sustainable villages.
- There must also be employment with the housing.
- We should try not to flood an area and making development more focussed.
- Need to ensure there is no pre-empting of sites. Need to reassess all possible sites that
  are available in both the north and the south. Sustainability Appraisal needs to be done

as part of the assessment process and not after the sites have been characteristics. 11 retro-fitted to the Council's decisions.

- Need to bring empty residential properties back into use
- Create new estates with a good mix of dwellings
- Make small additions to villages to make them more sustainable
- Maximise development on brownfield sites and work out how to release them
- Explore possibility of providing a new settlement rather than urban extensions
- Provide some housing within villages
- Maximise brownfield development
- Development should take place on a large number of small sites rather than a small number of large sites

### Summary & Response

Main issues raised:

Local urban grain and village character should be respected and any new development should be well integrated.

The policy on high quality development will seek to achieve this and will expect any development to respect its setting, if the area contains heritage assets, whether designated or not then there will be a new policy for this as well.

There needs to be clarity how Neighbourhood Plans will be used. A new policy on Neighbourhood Plans will be included in the Strategy.

There should be a balance between housing and jobs.

The Development Strategy will seek to ensure that there is a balance between the number of homes that are provided and the number of new jobs the area creates. Achieving the right balance between these two types of development, with the desire to enhance the local environment will result in sustainable communities which will benefit existing and future residents. The Strategy will identify strategic allocations for both housing and employment to ensure the creation of sustainable communities.

There should be more growth taken by the north part of Central Bedfordshire. The Council's approach to development will be informed by the principle that, in general, the largest settlements with the highest level of existing facilities and transport links offer the most sustainable options for development. This is consistent with the guidance set out in the National Planning Policy Framework. In the north there has been considerable development over recent years and there are still sites to be developed as set out in the Site Allocations document.

There needs to be a variety of scale of housing development, not just large schemes, villages also need some growth.

The size of the allocations does vary and it is expected that neighbourhood plans will deliver small sites, there may also be rural exception housing sites which will also provide smaller scale developments. In the north the Site Allocations document remains in place which sets out development in a range of sizes of settlements.

Need to maximise use of brownfield land.

The Strategy will seek to use brownfield land wherever possible, but the need for development is greater than the supply of brownfield land so undeveloped land will have to be used. It is also important to retain employment land to help create sustainable communities where people can live close to jobs.

#### **Development & Infrastructure**

- Implication of M1 and traffic congestion for Dunstable area.
- Luton airport.
- Community Infrastructure developments need to provide facilities and a range and balance of uses to encourage natural growth.
- Town centre improvements where there is growth.
- Issue of deliverability of facilities.
- Important to have development where services and utilities can provide for these developments.
- Luton and Dunstable Hospital is 'very tired' with limited capacity. Where will new health provision go? A505 corridor and access very poor.
- How much development dictates infrastructure?
- Existing infrastructure deficits should be made good before any other development takes place. Money from existing section 106 agreements should be spent first.
- There should be limited growth in villages with limited infrastructure.
- Existing services have not expanded enough to cope with the housing and other development which has already taken place.
- There needs to be a deliverable infrastructure strategy.
- Development must be phased with infrastructure.
- Some said there is to be no development before infrastructure is in place.
- Infrastructure existing facilities
- Funding! CIL and S106 sums are not adding up. The demands are making schemes unviable. We need to be careful what we ask for. There is only so much a developer can provide.
- Also need social infrastructure.
- Big schemes are stalling. No money in the recession.
- Phasing/ Triggers deliverability of new facilities ie: Schools and Healthcare
- Viability of development Impact of CIL -Charge passed to landowners might hold off selling land until market conditions improve.
- We need certainty of delivery. We need to ensure sites will be delivered and not left half complete and lacking facilities. Should we have reserve sites?
- Capitalise on & Sustain Existing Infrastructure The discussion turned to how the high
  development costs can often stifle development. It was broadly agreed that S106 obligations
  could not make sufficient contributions to plug the financial gap. One way to reduce these costs
  would be to make better use of existing infrastructure. This would also help existing settlements
  to grow and it would support existing services.
- Infrastructure will probably not be funded by S106 agreements.
- Consider medium-sized sites which can feed into existing infrastructure rather than large scale development/infrastructure.
- Need the infrastructure to provide healthy communities.
- Can CIL and s106 provide all the infrastructure? Viability.
- Top down RSS figures supposed to be replaced by a local bottom-up estimation is this the case? Where is this leading? Why the high scenario?
- Good for existing neighbourhoods to buy-in to development proposals but 'What is a Neighbourhood?'
- There may be benefits of working with existing infrastructure might potentially be more money for S106 planning obligations
- Today the area is worst after development than before it took place, it has not improved the area which it should have done.
- There should be rewards for developers who deliver good designs.
- Sustainable development is important.
- Possibly focus on land searches for growth
- The lower growth scenarios mentioned do not allow for Luton (or other sub-regional authorities) to grow
- 'Deliverability' was the main reason for the last plan failing Do not repeat mistakes of the past!
- People need to be more informed about other initiatives that are going on and are considerations ie T.C. Masterplans/ Development Briefs need to know the whole picture.
- Funding by the City should be considered in certain specific circumstances.
- Infrastructure should be front loaded.
- There is a problem of who funds infrastructure, particularly if it is front loaded.
- Consideration should be given to a different form of tax, which taxes the increase in value of

properties due to infrastructure improvements.

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- Retail and health facilities need to accompany development
- There were concerns that essential infrastructure would not be delivered on viability grounds
- It was considered by some that if services cannot be provided then the housing should not be built
- Inadequate pressure is put on other service providers in the private sector e.g. Anglian Water
- Infrastructure is needed for employment.
- Consider community power systems and generation, Draw on international and national examples (such as Sweden) to generate 'green' power.
- It is important not to depend on the National providers (for gas electricity etc.) who control prices too much and act as monopolies.
- It is important to promote the sense of community.
- The Council could act as a banker in the provision of infrastructure.
- Large sites are difficult and slow to deliver.
- Need to ensure infrastructure provision is appropriate and provided at the right time preferably
  up front. If infrastructure cannot be provided due to viability issues, then the development should
  not be allowed to go ahead.
- Development should be allowed in the south where there is an identified need. Where there is a need to build on land that is currently designated as greenbelt, compensatory green belt should be provided in the north.
- Neighbourhood Plans there is too much emphasis on Parish Council's planning and delivering large levels of development. If the Development Strategy is only allocating strategic sites, will Parish's be expected to plan for sites upwards of 500 dwellings? Need to clearly identify what is a strategic site and therefore what size sites parish's need to consider.
- Need to bear in mind what our neighbours are planning for in terms of housing and jobs.
- Improving quality of life
- Need to provide social infrastructure as part of new developments including facilities for young mums, seniors, teens. Need for community centres
- Need to provide infrastructure first before development takes place
- Need to use S106 money more efficiently
- Development should happen at the same pace as infrastructure provision

#### Summary & Response

Main issues raised:

Infrastructure is important and it should be delivered before development takes place.

The Council are developing a Community Infrastructure Levy and have a schedule of required infrastructure to help deliver the strategy, the viability of this will be tested. As development takes place funds will be available to provide the infrastructure, there will also be site specific legal agreements to deliver some local infrastructure for that specific sites, this will include affordable housing.

Size and distribution of sites See responses above

# **Environmental Challenges & Priorities**

- Acknowledgement of the agricultural land uses in CBC area
- There should be thorough appraisals including environmental appraisals before development takes place.
- Precautions against flooding should be taken in all new development and particularly there should be no development in floodplains.
- There should be rainwater recovery systems particularly in housing so it can be used where water does not have to be drinking water standard.
- Green Infrastructure is important and should be the first consideration and be in place before housing and other development takes place around it, and it should be accessible to all.

Wider environmental policy issues need to be considered

ANOB and the green belt need to be protected

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- Accurate plans showing the topography of an area will help to make us aware of environmental considerations
- Need to examine the viability of that land
- Protection of greenspaces and nature. Conservation continuation of green policies and level of protection in the North Core Strategy.
- Environmental issues should be included in the site assessment criteria and process.
- Environmental areas, issues and considerations should be integrated with the development strategy.
- Open spaces are needed with new development.
- There need to be new areas of greenspace, existing areas should be extended and they should be linked.
- There should be quality Greenspace.
- A Community Land Trust can hold open, greenspace, amenity land and environmental areas and manage them.
- Green Belt protection supported
- Development around conurbation should be west and south not north because its closer to the airport.
- The appearance of the Green Belt is not always a good indicator of its usefulness in Green Belt terms.
- Green Belt must be protected, it is a widely respected planning tool.
- Compensatory Green Belt must be provided if Green Belt is reviewed around LB/D/HR/L.
- Addressing and mitigating climate change is a key priority.
- We should insist on solar panels/PV tiles on new buildings.
- Water conservation measures are vital, such as rainfall capture and grey water usage.
- Government targets for climate change should be followed as they are already fairly stringent with a particular awareness of how dry the area is and how we may even more urgently need to respond to drought.
- Retrofitting of the existing housing stock is just as important as this forms the bulk of the houses in Central Bedfordshire however many new houses are delivered.
- Local food production in order to reduce energy consumption and food miles was supported by some
- Building regulations set good enough standards so why do we need to apply more regulation and standards.
- Rivers need dredging.
- We must harvest rainwater and use it where we do not need to use clean tap water, and we must manage run off to help stop flooding.
- Open space and greenspace are important for peoples physical and mental well being.
- Any new greenspace or open space should be based on evidence of a need for it and not just cater for a few.
- Eco-homes benchmarking standards. Code 4 OK and possibly Code 5 on big sites (economies of scale). Big questions over viability on smaller sites.
- Water Security! We are in a water constrained area. How will supplies and environmental standards be maintained?
- Need to consider the existing rural nature of Central Bedfordshire and our existing natural assets and environment. Current residents shouldn't be disadvantaged by the delivery of new development. Need to ensure protection for existing residents as well as for future residents.
- Green Infrastructure is essential. Must not forget the environment. We need quality design and development. Danger this will be forgotten in current economic climate. Same applies to the historic environment.
- Protect the best agricultural land
- Look at potential for compensatory Green Belt
- Protect agricultural land
- Improve access to countryside and green infrastructure
- Possibility of compensatory green belt

Agricultural land is important and should be safeguarded Outside settlement boundaries the open countryside is protected from development and there will be policies to protect the landscape and countryside, this should have the effect of safeguarding agricultural land. Part of the intentions of a high quality development policy is to use land efficiently so that the impact of new development on agricultural land is minimised. This should also offer the opportunity for local food production.

Appraisals covering Environmental Issues should take place before development takes place

The impact on the environment is one of the key areas against which both policies and allocated sites are assessed, through the Sustainability Appraisal process.

Flooding is an important issue, there should be no development in floodplains The Council works with the Environment Agency to ensure that development does not increase the likelihood of flooding and there will be a specific policy relating to mitigating flood risk. This will also coves encouraging sustainable drainage systems as well as seeking to minimise the effects of drought which can be a local issue.

The Green Belt needs to be protected and we need to consider compensatory Green Belt

There will be policies which protect the remaining Green Belt after the proposals in the plan have been completed. The Green Belt may be reviewed in the future when more development has taken place and the review will be based on the guidance contained in the NPPF.

There should be grey water harvesting and recycling.

Drought and water conservation are key issues in the area and consideration is given to this providing water buts and using rainwater are one of the ways to help achieve the Code for Sustainable Homes levels and BREEAM standards required by the policy on Resource Efficiency.

Ensuring the provision of quality accessible Green Infrastructure and Open Space.

This is an important topic and there are many benefits from providing Green Infrastructure, including water conservation, habitat creation and protection, recreation and its impact on the landscape. The High Quality Development approach will seek to contribute to this by ensuring there are linked green and open spaces, therewill also be specific policies on, Greenspace, Green Infrastructure, Landscape, Woodlands, Trees and Hedgerows as well as Leisure and Open Space Provision.

The Chilterns AONB needs to be protected

The AONB is protected by national legislation and any development within it which is permitted will be expected to comply with the Chilterns Buildings Design Guide.

Adaptation to the effects of climate change

There will be policies which require new buildings to reach high standards in terms of their sustainability ratings particularly in relation to water usage, orientation, landscaping and drainage.

### **Transport & Traffic**

- Transport considerations are essential
- Use Rail Freight to Reduce freight on the roads
- Transport increase around towns and villages.
- Roads are too narrow to cope with the increased traffic.
- Transport should be made more sustainable and sustainable transport modes should be encouraged.
- Public transport network needs to be strengthened
- Rural bus services not always reliable
- Reduce traffic congestion
- We have lost all our employment land to housing so where will all the jobs go? Will they all be out-of town? If so, we need the transport infrastructure and roads to cope. A1-M1 and Woodside links + J11a and new rail station are essential.
- A1-M1 etc. link all fine, but housing growth will just lead to same level of congestion later on.
- Provision of a good public transport service
- The link roads north of Luton and Houghton Regis will create more pressure to build more housing.
- The road network is already full! How will more traffic be accommodated?

## Summary & Response

Main issues raised:

Transport considerations are essential

There will be a chapter in the Development Strategy which considers the issue and seeks to reduce the need to travel, develop and encourage the use of more sustainable modes of transport as well as minimising the adverse impact of new development.

Use Rail Freight to reduce freight on the roads

There are limited opportunities to develop rail freight in the area but within the Strategy there is a specific proposal for the Sundon Rail Freight Interchange, which should help reduce the number of lorries on the roads.

Concerns have been raised about the roads being too narrow and congestion on the roads.

One of the key principles for transport in the strategy will be to reduce the need to travel, developing and encouraging the use of more sustainable modes of transport, such as walking, cycling and using public transport. New developments will be expected to mitigate fully any adverse impact they have on the transport network.

There is a need to encourage the use of public transport and other sustainable forms of transport, particularly in rural areas.

As stated above one of the key aims of the Strategy will be to develop more sustainable modes of transport and it is linked to the Local Transport Plan. A Public Transport Study is currently being undertaken and a new Passenger Transport Strategy is being developed, with the over intention to make better use of public transport.

The link roads north of Luton and Houghton Regis will create more pressure to build more housing.

These roads will be needed to serve the developments proposed in the Development Strategy and help remove large volumes of traffic from Dunstable centre which will assist in its regeneration.

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