

At a meeting of the **LUTON & SOUTH BEDS JOINT COMMITTEE** held in Committee Room 1, The Council Offices, High Street North, Dunstable, LU6 1LF on Friday, 23 July 2010

PRESENT:	Councillor RJ Davis (Vice-Chairman) Councillor Franks Councillor Mrs Hegley Councillor M Hussain Councillor Matthews Councillor McVicar Councillor Nicols (Chairman) Councillor Shadbolt Councillor Taylor Councillor Worlding Councillor Young	Luton Borough Council Luton Borough Council Central Bedfordshire Council Luton Borough Council Central Bedfordshire Council Central Bedfordshire Council Central Bedfordshire Council Central Bedfordshire Council Luton Borough Council Luton Borough Council Central Bedfordshire Council
SUBSTITUTES:	Cllr Rutstein for Cllr Dolling	Luton Borough Council
CO-OPTES:	Mr J Gelder Councillor D Jones	Local Strategic Partnership Town & Parish Councils
OBSERVERS:	Cllr Barnard for Cllr Brindley	North Hertfordshire District Council
IN ATTENDANCE:	Councillor Bowater Mr M Hargreaves Mr N McKillen Councillor Snelling	Central Bedfordshire Council GO-East GO-East Central Bedfordshire Council
OFFICERS:	Mr Alderson (CBC), Mr Chick (LBC), Mr Emerton (CBC), Mr Fox (CBC), Mrs Hobbs (CBC), Mr Owen (LBC), Mr Pagdin (LBC), Mr Robertson (JTU), Mr Robinson (CBC) and Mr Saunders (CBC)	

LSBJC/10/01 **Election of Chairman (Ref 1)**

RESOLVED

that Councillor Nicols (CBC) be elected Chairman of the Luton and South Bedfordshire Joint Committee for the ensuing Municipal Year.

Members agreed that Councillor RJ Davis take the Chair for this meeting, as the outgoing Chairman.

LSBJC/10/02 **Election of Vice-Chairman (Ref 2)**

RESOLVED

that Councillor RJ Davis (LBC) be elected Vice-Chairman of the Luton and South Bedfordshire Joint Committee for the ensuing Municipal Year.

LSBJC/10/03 Apologies for Absence (Ref 3)

Apologies were received from Councillor Dolling and Councillor Paternoster. Councillor Rutstein was substituting for Councillor Dolling.

LSBJC/10/04 Minutes (Ref 4)

An amendment was proposed to the minutes of the Luton and South Bedfordshire Joint Committee held on 23 October that minute 25 'Community Infrastructure Levy' should refer to the MSG minutes of 6 October 2009 and not 2008.

RESOLVED

that the Minutes of the meeting of the Luton and South Bedfordshire Joint Committee held on 23 October 2009 be confirmed and signed by the Chairman as a correct record, subject to the above amendment.

LSBJC/10/05 Members' Interests (Ref 5)

(a) Personal Interests:-

Councillor Franks declared a personal interest in agenda item 10 'Report on a Revised Joint Core Strategy' as he lived in an area that was detailed in the Core Strategy as significant importance for planning.

(b) Personal and Prejudicial Interests:-

None.

LSBJC/10/06 Urgent Business (Ref 6)

The Chairman advised Members that there was no urgent business.

LSBJC/10/07 Core Strategy Public Consultation (Ref 7)

Members considered the report of the Joint Officer Team which provided an addendum to the responses received to the Core Strategy and Key Diagram: Preferred Options document that was considered by the Joint Committee on 23 October 2009. In April 2010 a number of representations were missing from the detailed schedule of comments received. It was established that 14 responses had been sent to the Joint Technical Unit (JTU) via email and had wrongly been identified as duplicates of originals received by other means. These responses had now been analysed and had been dealt with in the identical way to those originally reported in October 2009.

Members were advised that since the publication of the Luton and South Bedfordshire Joint Committee agenda further comments had been received. An up to date schedule of comments received since the publication of the agenda is attached at Appendix A. Members stated that all comments received were analysed, recorded and taken on board. Members also highlighted an error on the schedule to reference 4342 and 4324.

The reason for decision was to enable the Luton and South Bedfordshire Joint Committee to have an overarching understanding of the type and origin of the representations received and the overall levels of support and objection expressed.

NOTED

the amendment to the Core Strategy Public Consultation report submitted to the Luton and South Bedfordshire Joint Committee on 23 October 2009 on the type and origin of the consultation responses received together with an indication of the level of support and objection.

LSBJC/10/08 Summary of Legislative Changes since October 2009 (Ref 8)

Members considered the report of the Joint Officer Team outlining the key changes in legislation, Government guidance and political context since the last Luton and South Bedfordshire Joint Committee meeting on 23 October 2009, in order that decisions would be based on the most up to date information. The report set out details on the:

- new coalition Government manifestos;
- Community Infrastructure Levy;
- Planning Policy Statement 4: Planning for Sustainable Economic Growth 2009;
- and other guidance updates.

Members received an update from Neil McKillen, GO-East. Members were advised that since the change in Government there would be radical changes within the forthcoming Bills of Parliament to the Local Development Framework system with the emphasis on "localism". The Government were strongly supporting local authorities working together. He explained that there was no longer a role for GO-East to be advising the Committee. Members thanked Neil McKillen and stated that they had appreciated the support that GO-East Officers had provided.

The reason for decision was to enable the Joint Technical Unit to make informed decisions and respond to national and regional issues at local level based on the latest available political and planning legislation context.

NOTED

the implications of the new legislation on the progression of the Luton and South Bedfordshire local Development Framework.

RESOLVED

that decisions on the type and timing of Local Development Framework documents and evidence base be informed by the updates within the report.

LSBJC/10/09 Summary Report on the Evidence Studies Updated or Completed since October 2009 (Ref 9)

Members considered the report of the Team Leader, Joint Technical Unit outlining the outcome of recent technical studies, any implications for future Local Development Framework (LDF) work and any resulting changes made to the Core Strategy. The report set out details on the following studies:

- Employment Land and Market Assessment Study;
- Strategic Housing Land Availability Assessment (SHLAA);
- Strategic Housing Market Assessment;
- Affordable Housing Thresholds Viability Study;
- Water Cycle Strategy Phase 2;
- Sustainable Development and Adaptation and Mitigation of Climate Change Study;
- Rural Settlement Sustainability Technical Paper;
- Infrastructure Delivery Plan and Funding Study; and
- Transport Modelling.

The Infrastructure Study was still ongoing and a substantial amount of work was being undertaken over the coming months. A full report on the study would be presented to the Luton and South Bedfordshire Joint Committee at their next meeting.

The Local Strategic Partnership representative highlighted that some of the rural settlements in southern Bedfordshire could encompass a small amount of growth to make them more sustainable.

Members noted that the number of additional homes needed between 2007 and 2021 for the Luton area was 5,700 and not 4,700 as stated in the report.

Members thanked the Officers for their hard work in preparing these studies.

The reason for decision was to ensure the Core Strategy was based on the most up to date and relevant evidence available.

NOTED

the findings of the technical studies outlined in the report.

LSBJC/10/10 Report on a Revised Joint Core Strategy (Ref 10)

Members considered the report of the Interim Head of the Joint Technical Unit (JTU) that informed the Joint Committee of the content of a Joint Core Strategy that took account of:

- (a) the results of the Core Strategy Public Consultation presented to the Joint Committee on 23 October 2009;
- (b) further consultation responses since 23 October 2009;
- (c) updated and additional baseline evidence produced since 23 October 2009;
- (d) the coalition government statements on the future of the Regional Spatial Strategy and the “Localism” agenda;
- (e) the identification of locally generated housing need in the absence of Regional Spatial Strategy “targets”; and
- (f) public funding of infrastructure and the general approach to national debt reduction.

Members were advised that the first proposed Core Strategy covered a 20 year period from 2011-2031 and the need for an additional 33,800 homes in southern Bedfordshire and Luton. The revised Joint Core Strategy now covered a more realistic 15 year period and the need for an additional 23,150 homes. The final Core Strategy would be presented to the Luton and South Bedfordshire Joint Committee in the autumn with further consultation being carried out during the winter. The Strategy would need to be kept under review to ensure that all evidence was kept up to date.

Members were made aware that Luton Borough Council was seeking clarification that the idea of developing land West of Luton had been considered as part of the JTU’s technical work on the Core Strategy and whilst recognising the preferred Sustainable Urban extensions within the Core Strategy that the possibility of some development on the west side of Luton remains open.

Members welcomed the revised user friendly Core Strategy. It was noted that to be a sound document the Core Strategy should be justified, effective and consistent with national policy. The Chairman stated that working in partnership between the two local authorities was necessary in achieving future housing and employment in the sub-region.

An investigation looking at different travel models was being carried out by the Luton Gateway Board.

The Local Strategic Partnership (LSP) representative confirmed the LSP’s strong support for the Core Strategy but commented that its vision might be made reflective of the Sustainable Community Strategy.

Members were advised that the definition of 'critical' under the Infrastructure Delivery Strategy might be described as 'showstoppers'. The A5-M1 Link (including the proposed Junction 11a) was defined as being critical. Members were advised that a new Developer Contributions Supplementary Planning Document would be considered in due course as guidance to developers.

The Core Strategy aimed to address the challenges of delivering new local infrastructure and recognised that partnership working with a variety of bodies would be necessary to achieve its successful implementation.

In a response to a question regarding East of Leighton Buzzard and the link road proposed to run from Heath Road, Members were advised that discussions were taking place with developers and transport engineers. Officers noted the request that the link road proposal be extended to run directly from Heath Road to the Leighton-Linslade bypass.

Members stated that they appreciated the work of the Joint Technical Unit and Officers and extended their thanks for their hard work during the past 9 months, in a period of change and uncertainty.

The reason for decision was to enable the Joint Technical Unit to publish the draft Core Strategy and associated technical material and thereby progress preparation of the Core Strategy to the next stage.

RESOLVED

- 1. that the draft Core Strategy as presented in the report, be agreed to be an appropriate basis for a final Core Strategy (Submission) Development Plan Document for consultation purposes;**
- 2. that the Joint Committee's requirements for any further investigative work and/or further public consultations, as may be identified and agreed, be undertaken; and**
- 3. that a final Core Strategy (Submission) Development Plan Document together with the associated Sustainability Appraisal be presented to the next Joint Committee meeting for approval.**

LSBJC/10/11 Report on a Design Guide for Central Bedfordshire (Ref 11)

Members considered a report of the Team Leader Local Development Framework for north Central Bedfordshire seeking adoption of the Supplementary Planning Document for the south area (former South Bedfordshire) of Central Bedfordshire subject to securing compliance with the recommendations. Members were advised that if the Design Guide for Central Bedfordshire was adopted, it would be a material consideration in the determination of planning applications for development in Central Bedfordshire.

The reason for decision was to enable the Council to meet the requirements of the Town and Country Planning and Compulsory Purchase Act 2004.

RESOLVED

- 1. to welcome the widespread and broadly positive response and support to the Draft Design Guide following formal public consultation; and**
- 2. to adopt the proposed Design Guide as a Supplementary Planning Document constituting part of its Local Development Framework.**

LSBJC/10/12 Strategic Applications Update (Ref 12)

Members received a copy of a letter from the Department for Communities and Local Government setting out the details of the public local inquiry on land at Stoke Road, Leighton Linlade. The letter stated that the Inspector recommended that the appeal be dismissed and that planning permission be refused.

NOTED

the letter and report on the Secretary of State's decision regarding land at Stoke Road, Leighton Linlade.

LSBJC/10/13 2008/09 External Audit Report (Ref 13)

Members considered the report of the Assistant Director of Planning & Development Strategy and the Senior Financial Advisor setting out the 2008/09 External Audit Report.

The External Audit Report highlighted that a publication scheme for Freedom of Information Act 2000 should be adopted by the Luton and South Bedfordshire Joint Committee. Further clarification was being sought from the Information Commissioner on the requirement in relation to this. Members were advised that a publication scheme would be drawn up and presented to the Joint Committee at their next meeting.

The reason for decision was to give effect to the required governance arrangements for the efficient and effective operation of the Joint Committee.

NOTED

the report.

LSBJC/10/14 **2009/10 Annual Statement of Accounts and Current Budget Position Update (Ref 14)**

Members considered the report of the Assistant Director of Planning & Development Strategy and the Senior Financial Advisor setting out the 2009/10 Annual Statement of Accounts and current budget position update.

Members noted that an amendment to the Annual Governance Statement on the third paragraph under 'Scope of responsibility' to read as follows:

"The Council, considers it has complied with a national code of corporate governance, which is consistent with the principles of the CIPFA/SOLACE Framework 'Delivering Good Governance in Local Government' (CIPFA 2007)."

The reason for decision was that the Accounts and Audit Regulations 2003 required that the 2009/10 Statement of Accounts be approved by the Joint Committee. The budget position would enable the Committee to plan its future work programme and resources.

RESOLVED

- 1. that the Statement of Accounts and Annual Governance Statement for 2009/10, be approved subject to the above amendment and audit; and**
- 2. that the Joint Committee budget position for 2010/11 and future years be noted together with the dependency on the existing revenue budgets of the two core authorities to meet the supporting employee and additional costs incurred in the preparation of the Joint Local Development Framework.**

LSBJC/10/15 **Minutes of the Members Steering Group (Ref 15)**

Members received the minutes from the Member Steering Group held on 13 July 2010.

NOTED

the minutes from the Member Steering Group held on 13 July 2010.

(Note: The meeting commenced at 9.30 a.m. and concluded at 10.45 a.m.)

Chairman

Dated

**Comments Received to Date upon the Luton & South Bedfordshire Joint Core Strategy : Pre-Submission Document
23 July 2010**

Respondent	Overview of Comment/Issue Raised	JTU Brief Response	Proposed Action
J B Planning Associates	Concern that reduced housing numbers and 15 yr planning period for the Core Strategy is flawed. Green Belt safeguarding is therefore deficient and infrastructure delivery of other northern options no longer viable. A proper iterative SSSA options assessment has not been undertaken.	The scale of provision is based on local need reflecting the 'localism agenda' and is nevertheless, the majority share of previous proposed housing provision and delivery is firmly based on the Housing trajectory and necessary strategic infrastructure. Strategic sites have been subject to SA and site assessment matrix.	No action – a matter for the Examination into the Core Strategy
Lainey Hines (Chair of Autism Bedfordshire)	1 letter and 21 postcards from members of the public in favour of Bushwood. The letter shows support for the vision of Bushwoods Disability facilities.	Noted.	No action – a matter for the Examination into the Core Strategy
Diane Cason (Secretary of Friends of Bushwood)	1 letter and 64 leaflets signed and sent in by members of the public in favour of Bushwood.	Noted.	No action – a matter for the Examination into the Core Strategy
"Friends of Bushwood" Facebook Group	A print out and petition from a group on the social networking site "Facebook"- supporting Bushwood ("Friends of Bushwood"). 169 members are listed and 80 of those members have signed a petition.	Noted.	No action – a matter for the Examination into the Core Strategy
Joanna Blair-Stuart (Chair person of the Families United Network)	1 letter supporting Bushwood for its vision of Disability Facilities.	Noted.	No action – a matter for the Examination into the Core Strategy
Willie Joyce (Secretary of the Galway Association Bedfordshire)	1 letter supporting Bushwood for its vision of providing benefits, networks and employment.	Noted.	No action – a matter for the Examination into the Core Strategy
Terence Nicholls (Member of Carers UK)	1 letter in support of Bushwood for its vision of Disability Facilities.	Noted.	No action – a matter for the Examination into the Core Strategy

Respondent	Overview of Comment/Issue Raised	JTU Brief Response	Proposed Action
Ekram Mahmutaj (on behalf of the Albanian Community Centre)	1 letter in support of Bushwood for its vision of family housing and range of sporting and educational facilities.	Noted.	No action – a matter for the Examination into the Core Strategy
Mohammad Rashid (President of the Islamic Cultural Society)	1 letter in support of Bushwood for its vision to relocate the Luton Football Club in favour of using the land for vital community, educational and leisure facilities.	Noted.	No action – a matter for the Examination into the Core Strategy
Neil Kane (Managing Director of Energy Maintenance Technologies Ltd)	1 letter showing support to Bushwood and the wish to be informed of all developments regarding this project.	Noted.	No action – a matter for the Examination into the Core Strategy
Dave Sinnot (Caddington Resident and Business Owner)	1 letter supporting Bushwood for the opportunities it could bring. Also requesting that a more amicable approach could be taken by local councillors.	Noted.	No action – a matter for the Examination into the Core Strategy
Martin Lawrence (Slip End Resident)	1 letter supporting Bushwood. Mentions feeling misled and misinformed by a very “vigilante” campaign being “forced upon” the villagers.	Noted.	No action – a matter for the Examination into the Core Strategy
Alan Garner (Caddington Resident)	1 letter in support of Bushwood for its vision of community facilities while maintaining boundaries.	Noted.	No action – a matter for the Examination into the Core Strategy
Derek Hesley (Caddington Resident)	1 letter in support of Bushwood community benefits although seeks assurances on a ‘green buffer’ to prevent coalescence of Caddington and Slip End. Concerns about the loss of countryside and “village” status i.e. that 5,500 houses is too many to be put in one area.	Noted.	No action – a matter for the Examination into the Core Strategy

Respondent	Overview of Comment/Issue Raised	JTU Brief Response	Proposed Action
Friends of Bushwood Petition	765 names supporting Bushwood for its vision of bringing sporting, leisure, health & Disability Facilities to the area.	Noted.	No action – a matter for the Examination into the Core Strategy
Petition (sender unknown – sent in with all of the above petitions)	81 names supporting Bushwood for its vision to regenerate Bury Park.	Noted.	No action – a matter for the Examination into the Core Strategy
Petition (sender unknown- sent in with all of the above petitions)	132 names supporting the Bushwood Proposals to the West of Luton	Noted.	No action – a matter for the Examination into the Core Strategy
Friends of Bushwood website	A print off of the website for Friends Of Bushwood showing 77 names of people in support of Bushwood.	Noted.	No action – a matter for the Examination into the Core Strategy
LBC Dept E&R Engineers Service	Factual correction to a housing figure table and consequently minor text amendments and further clarification of east of Luton employment SSSA and also edge of town centre development locations.	Accepted Drafting error.	To be addressed with further editing in preparing the draft Submission Core Strategy.
CBC Major Projects (Economic) Service	Factual correction to clarify the scope and extent of the proposed Planning Briefs for Leighton Buzzard Town Centre (proposed policy CS16)	Accepted. Drafting error.	To be addressed with further editing in preparing the draft Submission Core Strategy.
'Pursuing Perfection' Luton	Letter supporting Bushwood proposals special needs provision, from a parent interest group seeking to improve services for children in Luton with complex disabilities.	Noted	No action – a matter for the Examination into the Core Strategy
Mervyn Dobson (Director) Pegasus Planning Group	Inconsistent reference to east of Leighton Linslade SSSA - whether already includes contingency land within the green belt.	Accepted. Drafting error. Already includes contingency.	To be addressed with further editing in preparing the draft Submission Core Strategy.

Respondent	Overview of Comment/Issue Raised	JTU Brief Response	Proposed Action
North Luton Consortium (c/o Pegasus PG)	Early Infrastructure and Accessibility Issues Report (prepared by WSP) confirms that early phases of the north Houghton Regis SSSA can be delivered (2012) and are not conditional of the strategic infrastructure. Nevertheless NLC are committed to participating in securing the A5-M1 link as part of delivering the planned SSSA.	Noted	No action – a matter for the Examination into the Core Strategy
CBC Peter Fraser Head of Partnerships & Community Engagement	Seek clarification of the vision statement with regard to expansion of Luton to mean housing within the conurbation, and amend reference from 6 to 4 town centres in objective SO6.	Accepted. Drafting error.	To be addressed with further editing in preparing the draft Submission Core Strategy.
Kamal Bengougam (Resident of Lilley) Newspaper Article	Letter to Newspaper discussing the politics surrounding developments	Noted	No action – a matter for the Examination into the Core Strategy
T.Jenkins (Resident of Luton) Newspaper Article	Letter to Newspaper supporting Bushwood	Noted	No action – a matter for the Examination into the Core Strategy
Laura Kempzell (Newspaper Article)	A newspaper article supporting Bushwood and listing it's qualities and facilities it could bring. This article also shows quotes from "Loyal Luton" and Zulfgar Ahmed (chairman of the Dallow Development Trust) also showing their support to Bushwood.	Noted	No action – a matter for the Examination into the Core Strategy
Jim Thakoordin (Caddington Parish Councillor) as quoted in newspaper article	A quote in a newspaper article saying that pointing to the benefits of Bushwood due to its affordable housing.	Noted	No action – a matter for the Examination into the Core Strategy

Respondent	Overview of Comment/Issue Raised	JTU Brief Response	Proposed Action
Lee Allen (Dallow Business Partnership) Newspaper article.	A newspaper article supporting Bushwood claiming that the proposal is deliverable, affordable and good for the community.	Noted	No action – a matter for the Examination into the Core Strategy
Diane Cason (Friends Of Bushwood)	A further 300 signatures supporting Bushwood.	Noted	No action – a matter for the Examination into the Core Strategy

(Proposed Action i.e. “issue to be considered / investigated further” or “not to be included within the JCS”)

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Appendix A Luton and South Bedfordshire Core Strategy and Key Diagram: Preferred Options Public Consultation Misplaced Representations; Schedule of Responses Amended August 2010 Following 23rd July Committee

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4298	Mrs Helen Stone	Leighton Buzzard	Paragraph 2.11	No
<p>Comment: "Leighton Linslade has experienced high levels of recent housing development, particularly to the South East, with limited additional infrastructure provision". - This being the case (the Town's population has grown from 11,000 to 38,000 in recent years) no further large scale housing developments can be sustained and must not be built.</p>				
<p>JC Response: Not Agree Proposed Action: No action required</p>				
<p>JC Reason for Response: Scale of development to the East of Leighton Buzzard is considered the most appropriate to meet the needs of the town and the Growth Area's requirements. It takes account of previous completions and current housing proposals.</p>				
4305	Goodman	Cambridge	Question 2	No
<p>Comment: Strategic Objective SO3 is inappropriate because, while it makes provision for improvements to the image and quality of employment premises, it makes no provision for increases in the quantity of employment floor space and as such ignores both the requirements of the MKSMSRS and also the business needs that are highlighted in the relevant market evidence including the 2008 Halcrow review.</p>				
<p>JC Response: Not Agree Proposed Action: No action required</p>				
<p>JC Reason for Response: The Core Strategy Preferred Options makes provision for increasing the quantity of employment space through Preferred Option CS9, which seeks to deliver additional new employment land including the delivery of strategic employment sites.</p>				
4315	Mr D Compton	Leighton Buzzard	Paragraph 4.16	No
<p>Comment: It is unclear why there is a priority being given to the main conurbation i.e. Luton, Dunstable and Houghton Regis rather than Leighton Buzzard and Linslade before 2012. Does this mean there is to be an embargo on opportunities for urban development until 2012 in Leighton Linslade? If this is what the JC intend, it would fly in the face of accepted practice and guidance. Consequently this aspect of the Spatial Development Principles requires clarification and amendment.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: A Sustainable Urban Extension is proposed in Leighton Linslade.</p>				
4334	Mr D Compton	Leighton Buzzard	Paragraph 4.16	No
<p>Comment: It is unclear why there is a priority being given to the main conurbation i.e. Luton, Dunstable and Houghton Regis rather than Leighton Buzzard and Linslade before 2012. Does this mean there is to be an embargo on opportunities for urban development until 2012 in Leighton Linslade? If this is what the JC intend, it would fly in the face of accepted practice and guidance. Consequently this aspect of the Spatial Development Principles requires clarification and amendment.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: A Sustainable Urban Extension is proposed in Leighton Linslade.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4348	Mr J Dolan	Luton	Paragraph 4.16	No
<p>Comment: It is unclear why there is a priority being given to the main conurbation i.e. Luton, Dunstable and Houghton Regis rather than Leighton Buzzard and Linslade before 2012. Does this mean there is to be an embargo on opportunities for urban development until 2012 in Leighton Linslade? If this is what the JC intend, it would fly in the face of accepted practice and guidance. Consequently this aspect of the Spatial Development Principles requires clarification and amendment.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: A Sustainable Urban Extension is proposed in Leighton Linslade.</p>				
4306	Goodman	Cambridge	Paragraph 4.18	No
<p>Comment: The suggestion that new employment will be delivered within the existing urban area (at Napier Park and the BTR site) is completely inappropriate for the growth area's new Core Strategy. Napier Park and the BTR site are simply old Local Plan allocations and will do nothing to support the delivery of the required step change in the delivery of new employment opportunities.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: Sites within the urban areas will provide an opportunity to provide a range of uses on site to serve the needs of the existing and growing population of the area.</p>				
4307	Goodman	Cambridge	Paragraph 4.22	No
<p>Comment: The suggestion that large urban extensions are preferred to small urban extensions is not supported by a clear evidence base. In particular, the suggestion that smaller urban extensions cannot bring forward necessary infrastructure is wholly incorrect, on the basis that Goodman's land at M1 J12 can be delivered in infrastructure terms immediately whereas it continues to be impossible for the Local Planning Authority and relevant landowners to bring forward any new residential development or new bypass infrastructure on the preferred land immediately to the north of Luton and Houghton Regis.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: Larger urban extensions are identified to be more sustainable as the infrastructure required is provided on site. They are also more capable of creating communities than small urban extensions</p>				
4296	David Adams	Leighton Buzzard	Paragraph 4.27	No
<p>Comment: Strongly object to the Eastern development of LB due to: Lack of infrastructure; the increase in traffic; the loss of Green Belt land; the impact on the narrow gauge railway; the lack of employment; and building on the flood plain</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of existing evidence which identified East of Leighton Buzzard as the most appropriate location surrounding Leighton Linslade. Core Strategy seeks to protect Flood Plain.</p>				
4308	Goodman	Cambridge	Paragraph 4.31	No
<p>Comment: Where reviews of the Green Belt boundary are required, this should be identified in the Core Strategy and not deferred to subsequent Development Plan Documents, owing to the extent to which Green Belt reviews are an important matter of broad principle.</p>				
<p>JC Response: Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Core Strategy will be reviewing the Green Belt designation for the Strategic Allocations whilst the Site Allocations DPD will review the Green Belt designation for non-strategic site allocations.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4309	Goodman	Cambridge	Paragraph 4.33	No
<p>Comment: The suggestion that the response to a failure of the Local Planning Authority to deliver the required growth will be that "reviews will be undertaken and contingency strategies employed" is completely inadequate. It is clear that any Local Development Framework review would be extremely time consuming on the basis that the current version has demonstrably made slow progress. A more appropriate approach to delivery would be to provide for the immediate allocation of reserve locations which could serve to meet the need for new homes and jobs in the event that growth at the preferred sites cannot be delivered, together with appropriate triggers for their release.</p>				
<p>JC Response: Partially agree Proposed Action: No Action</p>				
<p>JC Reason for Response: Reserve and contingency sites are being identified as part of the Delivery and Implementation for the Core Strategy.</p>				
4304	Geraldine Beecroft	Leighton Buzzard	Question 4	No
<p>Comment: I do not agree to this development on the eastern side of the town mainly because there is no infrastructure to cope with all the new houses. We already have gridlock in the town as everyone has to come in over a bridge. Flood plain will not be able to cope. The water disposal unit is not coping already in parts of the east side of Town. We have three large new estates on the South side which still have not been catered for. We have lost three firms in the Town. Where will these people work? The Station car park needs even more spaces. There is no where else for them to park.</p>				
<p>JC Response: Statement with which neither agree nor disagree Proposed Action: No Action</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of existing evidence which identified East of Leighton Buzzard as the most appropriate location surrounding Leighton Linslade. Traffic improvement proposals will be implemented as part of the SUE.</p>				
4335	Mr D Compton	Leighton Buzzard	Question 4	No
<p>Comment: It is unclear whether "Land at the Pumping Station, Wing Road, Linslade, Leighton Buzzard" is part of the strategy. The SHLAA considers it "Not Developable" as it is in the green belt. The Practice Guidance says such policy constraints should not apply. CS1 prefers sites accessible by a choice of travel modes. CS5 seeks to maximise sustainable travel. The site at Wing Road is on a main road, the edge of a settlement, close to public transport including the main station accessible by walking or cycling. There must be recognition within the spatial development principles and Preferred Option CS1 that sites close to urban area and which are PDL should take preference for development. This site is such a site and should be considered accordingly. The strategy is very optimistic and based on cooperation from North Herts who do not want an urban extension. The JC should look at sites in Central Bedfordshire that are available and achievable.</p>				
<p>JC Response: Statement with which neither agree nor disagree Proposed Action: Further work to be undertaken to test the proposals and identify measures to mitigate impact</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of evidence that has identified the four identified SUE's as the most sustainable. Further work will be undertaken to test and refine development proposals.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4316	Mr D Compton	Leighton Buzzard	Question 4	No
<p>Comment: It is unclear whether "Land adjacent 138 Soulbury Road, Leighton Buzzard" is part of the strategy. The SHLAA considers it "Not Developable" as it is in the green belt and an area of great landscape value. The Practice Guidance says such policy constraints should not apply. CS1 prefers sites accessible by a choice of travel modes. CS5 seeks to maximise sustainable travel. The site at 138 Soulbury Road is on a main road, the edge of a settlement, close to public transport including the main station accessible by walking or cycling. The Government has approved housing development to the west of Linslade. This goes against the JC view that this area has landscape worthy of protection and indicates that it is a sustainable location for development, which is the same for my client's site. The strategy is very optimistic and based on cooperation from North Herts who do not want an urban extension. The JC should look at sites in Central Bedfordshire that are available and achievable.</p>				
<p>JC Response: Statement with which neither agree nor disagree</p>		<p>Proposed Action: Further work to be undertaken to test the proposals and identify measures to mitigate impact</p>		
<p>JC Reason for Response: Preferred Options based on evaluation of existing evidence which identified East of Leighton Buzzard as the most appropriate location surrounding Leighton Linslade. Further work will undertaken to test and refine development proposals.</p>				
4349	Mr J Dolan	Luton	Question 4	No
<p>Comment: It is unclear whether "Land off Leighton Road, Hockliffe" is part of the strategy. The SHLAA considers it "Not Developable" as it is in the green belt. The Practice Guidance says such policy constraints should not apply. CS1 prefers sites accessible by a choice of travel modes. CS5 seeks to maximise sustainable travel. The site at Leighton Road is on one of the main roads out of the settlement towards Leighton Buzzard frequented by buses as well as being in fairly close to the village facilities, which could be accessed by walking or cycling. There must be recognition within the spatial development principles and Preferred Option CS1 that sites close to urban area and which are PDL should take preference for development. This site is such a site and should be considered accordingly. In that context, the intention to provide a limited scale of development in or on the edge of rural settlements that are currently excluded from the green belt is supported, as this site would certainly accord with that objective. The strategy is very optimistic and based on cooperation from North Herts who do not want an urban extension. The JC should look at sites in Central Bedfordshire that are available and achievable.</p>				
<p>JC Response: Statement with which neither agree nor disagree</p>		<p>Proposed Action: Further work to be undertaken to test the proposals and identify measures to mitigate impact</p>		
<p>JC Reason for Response: Preferred Options based on evaluation of evidence that has identified the four identified SUE's as the most sustainable. Further work will be undertaken to test and refine development proposals.</p>				
4310	Goodman	Cambridge	Question 4	No
<p>Comment: Land within Goodman's control at M1 J12 should be identified as a strategic growth location, due to: Deliverability; Availability of land to accommodate a variety of new development options; Single land ownership; Excellent existing transport connections by road; Excellent public transport accessibility plus potential to enhance public transport connections; Low landscape importance, well contained by features including the M1; Absence of environmental constraints. Given the extent to which the consultation document seeks to link new development with public transport provision, it is baffling that the potential to locate development close to Harlington Railway Station is ignored. This is a major failure and should be corrected in the next iteration of the Core Strategy in due course. 'Junction 11A' in the Key Diagram should be deleted due to ongoing deliverability questions. The Key Diagram should incorporate other nearby population centres that will influence the pattern of growth, including Milton Keynes.</p>				
<p>JC Response: Not Agree</p>		<p>Proposed Action: No Action</p>		
<p>JC Reason for Response: Preferred Options based on evaluation of evidence that has identified the four identified SUE's as the most sustainable.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4303	Miss Caroline Hamilton	Leighton Buzzard	Question 4	No
<p>Comment: I object to any development on the eastern side of Leighton Buzzard. My house faces the Hockliffe Road and in the 16 yrs I have lived there the traffic on the road has increased no end. Since the lorry ban on Vandyke Rd, the amount of lorries using the road has increased and they have now started to shake my house as they pass. The traffic noise starts earlier in the day and ends in the late hours of the night. If more houses are built, this will increase and make my home unbearable to live in. Will make having access out onto the Hockliffe Rd from Appenine Way even harder in rush hour traffic and also ruin what is left of the nice Leighton Buzzard.</p>				
<p>JC Response: Statement with which neither agree nor disagree Proposed Action: No Action</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of existing evidence which identified East of Leighton Buzzard as the most appropriate location surrounding Leighton Linslade. Traffic improvement proposals will be implemented as part of the SUE.</p>				
4294	Keep Hitchin Special	Not Known	Question 4	No
<p>Comment: The 5,500 houses planned in North Herts should not happen. There must be other areas that can be regenerated within brown field sites in Bedfordshire to generate these dwellings without encroaching on North Hertfordshire.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of existing evidence including environmental sensitivity analysis. Further work to be undertaken to test and refine development proposals.</p>				
4293	Bruce McIntee	Not Known	Question 4	No
<p>Comment: Whilst recognising the need for Luton expansion to meet regional targets for increased housing etc, Herts has its own expansion targets to meet without losing its countryside to assist Luton. Furthermore, with the massive expansion proposed west of Stevenage, and the already strained transport and other infrastructure in N Herts, significant development east of Luton makes no sense.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of existing evidence including environmental sensitivity analysis. Further work to be undertaken to test and refine development proposals.</p>				
4355	Alison Nash	Leighton Buzzard	Question 4	No
<p>Comment: (This submission was an email petition from ten Leighton Buzzard residents) Object to housing expansion at Leighton Buzzard: Will increase Leighton Buzzard by 25%, where infrastructure already struggles. Will lose single-centred, traditional market town. More cars, traffic congestion and noise on overstretched roads and parking facilities. Increase in noise, light, air pollution. Proportionately more housing than other areas. Recent developments still unfinished; no confidence infrastructure will be prioritised. Railway station overstretched. Main police station in Dunstable. How can these support increased population of this scale? Greenbelt should not be compromised: detrimental to character of town and local wildlife. Small areas of green are not adequate with scale of build. Stockgrove Park overstretched at weekends. Mineral rights on land east of Leighton Buzzard. Development will push boundaries with Heath and Reach/ Hockliffe and lose character of outskirts. Impact on Narrow Gauge Railway, through only stretch of open countryside on its route.</p>				
<p>JC Response: Statement with which neither agree nor disagree Proposed Action: Further work to be undertaken to test the proposals and identify measures to mitigate impact</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of evidence that has identified the four identified SUE's as the most sustainable. Further work will be undertaken to test and refine development proposals.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4323	Dr M Nasir	Caddington	Question 4	No
<p>Comment: It is unclear whether "Land at Top Valley Lodge, Chaul End Village, Caddington" is part of the strategy. There needs to be more clarity in the final Core Strategy as well as confidence that my clients' site stands a reasonable chance of development. One of the options to the east of Luton involves land within North Herts where there is significant opposition to any extension, more so than other proposed extensions. There is considerable doubt as to whether this will ever come forward. There must be recognition that sites close to urban areas and on PDL should take preference. This site should be considered accordingly. The intention to provide limited development in or on the edge of rural settlements currently excluded from the green belt is supported. As the site is within Chaul End, development is regarded as infill. The strategy is very optimistic and based on cooperation from North Herts who do not want an extension. The JC should look closely at sites in Central Beds that are available and achievable.</p>				
<p>JC Response: Not Agree Proposed Action: Further work to be undertaken to test the proposals and identify measures to mitigate impact</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of evidence that has identified the four identified SUE's as the most sustainable. Further work will be undertaken to test and refine development proposals.</p>				
4341	Dr M Nasir	Caddington	Question 4	No
<p>Comment: It is unclear whether the "Site of Former Catholic Mass Centre, Tithe Farm Road, Houghton Regis" is part of the strategy. CS1 prefers sites accessible by a choice of travel modes. CS5 seeks to maximise sustainable travel. The site at Tithe Farm Road is accessible to public transport as well as being fairly close to shopping and leisure facilities, which could be accessed by walking or cycling. There must be recognition within the spatial development principles and Preferred Option CS1 that sites close to urban area and which are PDL should take preference for development. This site is such a site and should be considered accordingly. The strategy is very optimistic and based on cooperation from North Herts who do not want an urban extension. The JC should look at sites in Central Bedfordshire that are available and achievable.</p>				
<p>JC Response: Statement with which neither agree nor disagree Proposed Action: Further work to be undertaken to test the proposals and identify measures to mitigate impact</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of evidence that has identified the four identified SUE's as the most sustainable. Further work will be undertaken to test and refine development proposals.</p>				
4301	Susan Rowe	Leighton Buzzard	Question 4	No
<p>Comment: By letting this go ahead you are making the possibility of flooding in Leighton (and particularly the Planets) a probability. You cannot build safely on flood plains. During the past few years we have seen towns flooded and people left homeless - do you not read newspapers or watch television? You could well bring this same devastation to Leighton Buzzard. I could go on to talk about infrastructure, the railway, greenbelt, but I think you should refuse the building of this Eastern Development purely because of the danger of flooding - any talks should never get past this point.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of existing evidence which identified East of Leighton Buzzard as the most appropriate location surrounding Leighton Linlade. Core Strategy seeks to protect Flood Plain.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4297	Mrs Helen Stone	Leighton Buzzard	Question 4	No
<p>Comment: The proposed site for the Eastern Development is on either side of Clipstone Brook. This is a known floodplain area and has caused serious flooding in the recent past. There is nothing of substance to show that all necessary steps, including funding, is in place to resolve this issue. You have stated the emphasis will be on complementing and safeguarding Leighton Buzzard's character and viability. If that is the case, why is there no mention of the town's very important and successful tourist attraction, the Narrow Gauge Railway, which attracts over 10,000 visitors each year? The location of the proposed Eastern Development will directly affect the route of the railway and remove the remaining open landscape views. You also mention provision of "further high quality open space and green linkages to the countryside", but are proposing to take greenbelt designated land to accommodate the Eastern Development. This is a contradiction and will lessen the quality of life for all local residents. A huge infrastructure deficit has built up in Leighton Linlade and until this position is rectified, no new developments should be considered. 10,000 people from this market town, including myself, signed a Petition in 2007 stating that they didn't want this Eastern Development. In addition, I and many other local residents, took part in a demonstration March earlier this year, to once again voice our objections to this unwanted additional housing development.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of existing evidence which identified East of Leighton Buzzard as the most appropriate location surrounding Leighton Linlade. Core Strategy seeks to protect Flood Plain.</p>				
4302	Mr Andrew Wingrove	Leighton Buzzard	Question 4	No
<p>Comment: I strongly object to the eastern Leighton Buzzard development.</p>				
<p>JC Response: Statement with which neither agree nor disagree Proposed Action: No Action</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of existing evidence which identified East of Leighton Buzzard as the most appropriate location surrounding Leighton Linlade. Core Strategy seeks to protect Flood Plain.</p>				
4329	Mr S Worts	Houghton Regis	Question 4	No
<p>Comment: It is unclear whether "Land at Bury Spinney, Thorn Road, Houghton Regis" is part of the strategy. It appears to be in the area indicated in the key diagram, as the preferred urban extension north of Houghton Regis, and given its status as PDL, presumably it will be considered for development. I would hope that once my reasons have been considered, it will result in more clarity being afforded to the final Core Strategy as well confidence to my clients that their site stands a reasonable chance of development. One of the options to the east of Luton involves land, which is within North Herts and it is noted that it is the intention to work with North Herts in order to seek the allocation of the urban extension. However it is understood from the local press and other publicity that there is a significant amount of opposition to any extension into North Herts, more so than to the other proposed extensions. Therefore there must be considerable doubt as to whether this urban extension will ever come forward.</p>				
<p>JC Response: Statement with which neither agree nor disagree Proposed Action: Further work to be undertaken to test the proposals and identify measures to mitigate impact</p>				
<p>JC Reason for Response: Land to the north of Houghton Regis is identified as a preferred SUE. Further work will be undertaken to test and refine development proposals</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4319	Mr D Compton	Leighton Buzzard	Paragraph 4.45	
<p>Comment: Whilst a strategy of trying to achieve a comprehensive and consistent approach to securing developer contributions is supported in principle, it would be invidious to try and seek contributions at a level that did not recognise the current economic climate. In particular it is unlikely that developers will be able to afford both a tariff based approach as well as through Section 106 agreements for the short to medium term. In order to ensure the timely provision of infrastructure, it would be better to seek government funding to cover the initial cost and then seek to recoup this from developers as the economy recovers and developments start taking off.</p>				
<p>JC Response: Agree Proposed Action: Delivery Plan to be included in the Submission Stage.</p>				
<p>JC Reason for Response: The evidence supporting the Core Strategy will need to demonstrate the deliverability of the Core Strategy proposals and its supporting infrastructure. The Core Strategy will be accompanied by a Delivery Plan at submission stage containing a schedule of infrastructure provision, timing and funding.</p>				
4338	Mr D Compton	Leighton Buzzard	Paragraph 4.45	
<p>Comment: Whilst a strategy of trying to achieve a comprehensive and consistent approach to securing developer contributions is supported in principle, it would be invidious to try and seek contributions at a level that did not recognise the current economic climate. In particular it is unlikely that developers will be able to afford both a tariff based approach as well as through Section 106 agreements for the short to medium term. In order to ensure the timely provision of infrastructure, it would be better to seek government funding to cover the initial cost and then seek to recoup this from developers as the economy recovers and developments start taking off.</p>				
<p>JC Response: Agree Proposed Action: Delivery Plan to be included in the Submission Stage.</p>				
<p>JC Reason for Response: The evidence supporting the Core Strategy will need to demonstrate the deliverability of the Core Strategy proposals and its supporting infrastructure. The Core Strategy will be accompanied by a Delivery Plan at submission stage containing a schedule of infrastructure provision, timing and funding.</p>				
4352	Mr J Dolan	Luton	Paragraph 4.45	
<p>Comment: Whilst a strategy of trying to achieve a comprehensive and consistent approach to securing developer contributions is supported in principle, it would be invidious to try and seek contributions at a level that did not recognise the current economic climate. In particular it is unlikely that developers will be able to afford both a tariff based approach as well as through Section 106 agreements for the short to medium term. In order to ensure the timely provision of infrastructure, it would be better to seek government funding to cover the initial cost and then seek to recoup this from developers as the economy recovers and developments start taking off.</p>				
<p>JC Response: Agree Proposed Action: Delivery Plan to be included in the Submission Stage.</p>				
<p>JC Reason for Response: The evidence supporting the Core Strategy will need to demonstrate the deliverability of the Core Strategy proposals and its supporting infrastructure. The Core Strategy will be accompanied by a Delivery Plan at submission stage containing a schedule of infrastructure provision, timing and funding.</p>				
4344	Dr M Nasir	Caddington	Paragraph 4.45	
<p>Comment: Whilst a strategy of trying to achieve a comprehensive and consistent approach to securing developer contributions is supported in principle, it would be invidious to try and seek contributions at a level that did not recognise the current economic climate. In particular it is unlikely that developers will be able to afford both a tariff based approach as well as through Section 106 agreements for the short to medium term. In order to ensure the timely provision of infrastructure, it would be better to seek government funding to cover the initial cost and then seek to recoup this from developers as the economy recovers and developments start taking off.</p>				
<p>JC Response: Agree Proposed Action: Delivery Plan to be included in the Submission Stage.</p>				
<p>JC Reason for Response: The evidence supporting the Core Strategy will need to demonstrate the deliverability of the Core Strategy proposals and its supporting infrastructure. The Core Strategy will be accompanied by a Delivery Plan at submission stage containing a schedule of infrastructure provision, timing and funding.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4326	Dr M Nasir	Caddington	Paragraph 4.45	
<p>Comment: Whilst a strategy of trying to achieve a comprehensive and consistent approach to securing developer contributions is supported in principle, it would be invidious to try and seek contributions at a level that did not recognise the current economic climate. In particular it is unlikely that developers will be able to afford both a tariff based approach as well as through Section 106 agreements for the short to medium term. In order to ensure the timely provision of infrastructure, it would be better to seek government funding to cover the initial cost and then seek to recoup this from developers as the economy recovers and developments start taking off.</p>				
<p>JC Response: Agree Proposed Action: Delivery Plan to be included in the Submission Stage.</p>				
<p>JC Reason for Response: The evidence supporting the Core Strategy will need to demonstrate the deliverability of the Core Strategy proposals and its supporting infrastructure. The Core Strategy will be accompanied by a Delivery Plan at submission stage containing a schedule of infrastructure provision, timing and funding.</p>				
4330	Mr S Worts	Houghton Regis	Paragraph 4.45	
<p>Comment: Whilst a strategy of trying to achieve a comprehensive and consistent approach to securing developer contributions is supported in principle, it would be invidious to try and seek contributions at a level that did not recognise the current economic climate. In particular it is unlikely that developers will be able to afford both a tariff based approach as well as through Section 106 agreements for the short to medium term. In order to ensure the timely provision of infrastructure, it would be better to seek government funding to cover the initial cost and then seek to recoup this from developers as the economy recovers and developments start taking off.</p>				
<p>JC Response: Agree Proposed Action: Delivery Plan to be included in the Submission Stage.</p>				
<p>JC Reason for Response: The evidence supporting the Core Strategy will need to demonstrate the deliverability of the Core Strategy proposals and its supporting infrastructure. The Core Strategy will be accompanied by a Delivery Plan at submission stage containing a schedule of infrastructure provision, timing and funding.</p>				
4311	Goodman	Cambridge	Paragraph 5.3	No
<p>Comment: Various potential locations for Park and Ride facilities are identified, however no evidence base has been put forward to explain and justify the selection of these sites. Goodman considers that a major development at M1 J12 has the potential to accommodate an element of Park and Ride and this option should be reflected in the Local Development Framework.</p>				
<p>JC Response: Not agreed Proposed Action: No action</p>				
<p>JC Reason for Response: The locations of the Park and Ride sites are based on existing technical evidence. More work will be undertaken to refine these locations.</p>				
4299	Mrs Helen Stone	Leighton Buzzard	Question 5	No
<p>Comment: There are no adequate proposals put forward for Leighton Linlade, with the investment emphasis directed solely to Luton, Houghton Regis and Dunstable. The proposed 2500 dwellings for Leighton Linlade cannot be integrated into the already congested and inadequate road and rail links.</p>				
<p>JC Response: Partially agreed Proposed Action: Further work to be undertaken to finalise the transport infrastructure needed to support growth, to identify appropriate measures to mitigate impact and ensure the its timely delivery</p>				
<p>JC Reason for Response: Provision for the level and type of Transport infrastructure that ongoing transport studies demonstrate is needed to support growth will be included in the Core Strategy. The means by which it will be delivered and over what timescales will also be included.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4343	Dr M Nasir	Caddington	Paragraph 6.3	No
<p>Comment: There is significant concern that given the size of the extensions being proposed, the amount of forward infrastructure that is required to be funded before they can delivered and the lack of funding available to developers in the recession (probably for sometime after as well), there will be little prospect of these large urban extensions actually coming forward. It is difficult to see how these sites will start to be delivered in the time scale envisaged. This is where smaller sites, such as my client's can make a valuable contribution as they can be developed fairly quickly with little supporting infrastructure.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Core Strategy has been informed by a wide ranging technical evidence base. Work is ongoing to assess the infrastructure requirements needed to support the growth.</p>				
4325	Dr M Nasir	Caddington	Paragraph 6.3	No
<p>Comment: There is significant concern that given the size of the extensions being proposed, the amount of forward infrastructure that is required to be funded before they can delivered and the lack of funding available to developers in the recession (probably for sometime after as well), there will be little prospect of these large urban extensions actually coming forward. It is difficult to see how these sites will start to be delivered in the time scale envisaged. This is where smaller sites can make a valuable contribution as they can be developed fairly quickly with little supporting infrastructure.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Core Strategy has been informed by a wide ranging technical evidence base. Work is ongoing to assess the infrastructure requirements needed to support the growth.</p>				
4339	Mr D Compton	Leighton Buzzard	Question 8	No
<p>Comment: It is considered that the dwelling numbers expected from within the urban areas are still too optimistic despite the recognition that it will reduce from 60% to 40% from 2021 - 2031. It is considered that the technical evidence in the form of the SHLAA and Urban Capacity study that has been undertaken is not comprehensive enough to justify a 60% contribution up to 2021 and a 40% contribution from 2021 - 2031. This is particularly the case in regard to flatted development for which the majority of urban land is expected to provide. There is a very limited market for flats (which is unlikely to recover for the foreseeable future) unless it is close to the town centre. The alternative of houses is more land hungry and so would result in a reduced yield from this source. Consequently, in all likelihood, more dwellings will be required to be allocated on other land.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The SHLAA is updated on an annual basis and is informed by developers and landowners. The SHLAA forms part of the technical evidence on which the growth figures are based and is undertaken in line with Government guidance.</p>				
4320	Mr D Compton	Leighton Buzzard	Question 8	No
<p>Comment: It is considered that the dwelling numbers expected from within the urban areas are still too optimistic despite the recognition that it will reduce from 60% to 40% from 2021 - 2031. It is considered that the technical evidence in the form of the SHLAA and Urban Capacity study that has been undertaken is not comprehensive enough to justify a 60% contribution up to 2021 and a 40% contribution from 2021 - 2031. This is particularly the case in regard to flatted development for which the majority of urban land is expected to provide. There is a very limited market for flats (which is unlikely to recover for the foreseeable future) unless it is close to the town centre. The alternative of houses is more land hungry and so would result in a reduced yield from this source. Consequently, in all likelihood, more dwellings will be required to be allocated on other land.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The SHLAA is updated on an annual basis and is informed by developers and landowners. The SHLAA forms part of the technical evidence on which the growth figures are based and is undertaken in line with Government guidance.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4353	Mr J Dolan	Luton	Question 8	No
<p>Comment: It is considered that the dwelling numbers expected from within the urban areas are still too optimistic despite the recognition that it will reduce from 60% to 40% from 2021 - 2031. It is considered that the technical evidence in the form of the SHLAA and Urban Capacity study that has been undertaken is not comprehensive enough to justify a 60% contribution up to 2021 and a 40% contribution from 2021 - 2031. This is particularly the case in regard to flatted development for which the majority of urban land is expected to provide. There is a very limited market for flats (which is unlikely to recover for the foreseeable future) unless it is close to the town centre. The alternative of houses is more land hungry and so would result in a reduced yield from this source. Consequently, in all likelihood, more dwellings will be required to be allocated on other land. Another strand of CS6 is to identify and allocate sufficient sites to meet the housing requirements for the rest of southern Bedfordshire with development focused on larger villages, which includes Hockliffe. This aspect of the option is supported.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The SHLAA is updated on an annual basis and is informed by developers and landowners. The SHLAA forms part of the technical evidence on which the growth figures are based and is undertaken in line with Government guidance.</p>				
4327	Dr M Nasir	Caddington	Question 8	No
<p>Comment: It is considered that the dwelling numbers expected from within the urban areas are still too optimistic despite the recognition that it will reduce from 60% to 40% from 2021 - 2031. It is considered that the technical evidence in the form of the SHLAA and Urban Capacity study that has been undertaken is not comprehensive enough to justify a 60% contribution up to 2021 and a 40% contribution from 2021 - 2031. This is particularly the case in regard to flatted development for which the majority of urban land is expected to provide. There is a very limited market for flats (which is unlikely to recover for the foreseeable future) unless it is close to the town centre. The alternative of houses is more land hungry and so would result in a reduced yield from this source. Consequently, in all likelihood, more dwellings will be required to be allocated on other land. Another strand of CS6 is to identify and allocate sufficient sites to meet the housing requirements for the rest of southern Bedfordshire with development focused on larger villages, which includes Caddington. Whilst this approach is supported, the option should recognise the contribution that infill development on previously developed land, particularly where this is located within existing villages, even if they are located a little away from the larger villages as mentioned in the preferred option.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The SHLAA is updated on an annual basis and is informed by developers and landowners. The SHLAA forms part of the technical evidence on which the growth figures are based and is undertaken in line with Government guidance.</p>				
4345	Dr M Nasir	Caddington	Question 8	No
<p>Comment: It is considered that the dwelling numbers expected from within the urban areas are still too optimistic despite the recognition that it will reduce from 60% to 40% from 2021 - 2031. It is considered that the technical evidence in the form of the SHLAA and Urban Capacity study that has been undertaken is not comprehensive enough to justify a 60% contribution up to 2021 and a 40% contribution from 2021 - 2031. This is particularly the case in regard to flatted development for which the majority of urban land is expected to provide. There is a very limited market for flats (which is unlikely to recover for the foreseeable future) unless it is close to the town centre. The alternative of houses is more land hungry and so would result in a reduced yield from this source. Consequently, in all likelihood, more dwellings will be required to be allocated on other land.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The SHLAA is updated on an annual basis and is informed by developers and landowners. The SHLAA forms part of the technical evidence on which the growth figures are based and is undertaken in line with Government guidance.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4332	Mr S Worts	Houghton Regis	Question 8	No
<p>Comment: It is considered that the dwelling numbers expected from within the urban areas are still too optimistic despite the recognition that it will reduce from 60% to 40% from 2021 - 2031. It is considered that the technical evidence in the form of the SHLAA and Urban Capacity study that has been undertaken is not comprehensive enough to justify a 60% contribution up to 2021 and a 40% contribution from 2021 - 2031. This is particularly the case in regard to flatted development for which the majority of urban land is expected to provide. There is a very limited market for flats (which is unlikely to recover for the foreseeable future) unless it is close to the town centre. The alternative of houses is more land hungry and so would result in a reduced yield from this source. Consequently, in all likelihood, more dwellings will be required to be allocated on other land.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The SHLAA is updated on an annual basis and is informed by developers and landowners. The SHLAA forms part of the technical evidence on which the growth figures are based and is undertaken in line with Government guidance.</p>				
4336	Mr D Compton	Leighton Buzzard	Paragraph 6.28	No
<p>Comment: The JC does not appear to have a contingency plan. There is no indication of where these sites are and how they will come forward. It is important to provide as much certainty as possible as to what sites would be considered for both community and landowners/developers. In such a scenario where the urban extension east of Luton does not materialise, then it would be preferable to ensure that sites close to the main settlements that are available, developable and can come forward within a reasonable time period are allocated. To that end, it is considered that the site at the Wing Road pumping station would be an ideal site for allocation given its location close to the urban settlement.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Preferred Options are based on an existing technical evidence base. Land to the east of Leighton Linlade has been identified for an urban extension within the Core Strategy. Further technical work will be undertaken to refine these options.</p>				
4317	Mr D Compton	Leighton Buzzard	Paragraph 6.28	No
<p>Comment: The JC does not appear to have a contingency plan. There is no indication of where these sites are and how they will come forward. It is important to provide as much certainty as possible as to what sites would be considered for both community and landowners/developers. In such a scenario where the urban extension east of Luton does not materialise, then it would be preferable to ensure that sites close to the main settlements that are available, developable and can come forward within a reasonable time period are allocated. To that end, it is considered that the site adjacent 138 Soulbury Road would be an ideal site for allocation given its location close to the urban settlement.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Preferred Options are based on an existing technical evidence base. Land to the east of Leighton Linlade has been identified for an urban extension within the Core Strategy. Further technical work will be undertaken to refine these options.</p>				
4350	Mr J Dolan	Luton	Paragraph 6.28	No
<p>Comment: The JC does not appear to have a contingency plan. There is no indication of where these sites are and how they will come forward. It is important to provide as much certainty as possible as to what sites would be considered for both community and landowners/developers. In such a scenario where the urban extension east of Luton does not materialise, then it would be preferable to ensure that sites close to the main settlements that are available, developable and can come forward within a reasonable time period are allocated. To that end, it is considered that the site at Leighton Road would be an ideal site for allocation given its location close to the settlement.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Preferred Options are based on an existing technical evidence base. Land to the east of Leighton Linlade has been identified for an urban extension within the Core Strategy. Further technical work will be undertaken to refine these options.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4342	Dr M Nasir	Caddington	Paragraph 6.28	No
<p>Comment: The JC does not appear to have a contingency plan. There is no indication of where these sites are and how they will come forward. It is important to provide as much certainty as possible as to what sites would be considered for both community and landowners/developers. In such a scenario where the urban extension east of Luton does not materialise, then it would be preferable to ensure that sites close to the main settlements that are available, developable and can come forward within a reasonable time period are allocated. To that end, it is considered that the site at Tithe Farm Road would be an ideal site for allocation given its location close to the urban settlement.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of evidence that has identified the four identified SUE's as the most sustainable. Further work will be undertaken to test and refine development proposals.</p>				
4324	Dr M Nasir	Caddington	Paragraph 6.28	No
<p>Comment: The JC does not appear to have a contingency plan. There is no indication of where these sites are and how they will come forward. It is important to provide as much certainty as possible as to what sites would be considered for both community and landowners/developers. In such a scenario where the urban extension east of Luton does not materialise, then it would be preferable to ensure that sites close to the main settlements that are available, developable and can come forward within a reasonable time period are allocated. To that end, it is considered that the site at Top Valley Lodge would be an ideal site for development given its location within an existing village close to the main settlements of Luton and Caddington.</p>				
<p>JC Response: Not agree Proposed Action: No Action</p>				
<p>JC Reason for Response: Preferred Options based on evaluation of evidence that has identified the four identified SUE's as the most sustainable. Further work will be undertaken to test and refine development proposals.</p>				
4321	Mr D Compton	Leighton Buzzard	Question 10	Yes
<p>Comment: The provision of affordable housing is in principle supported but this has to be undertaken viably, particularly when considered against the contributions that are required to other infrastructure that is also being sought. Therefore, it is concerning to see that the starting point for the consideration of affordable housing is 35% of dwellings undertaken with a requirement for individual site viability analysis to be submitted where the departure from the housing target is sought. In the current economic climate, a much lower threshold as the starting point for negotiations should be set that could rise as conditions improve. It is suggested that 20% would be suitable in this regard as it would not put off landowners from bringing forward sites for development.</p>				
<p>JC Response: Partially agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Preferred Options document is based on existing technical evidence. Further work is being undertaken as part of the Strategic Housing Market Assessment (SHMA) to identify affordable housing thresholds and percentages.</p>				
4340	Mr D Compton	Leighton Buzzard	Question 10	Yes
<p>Comment: The provision of affordable housing is in principle supported but this has to be undertaken viably, particularly when considered against the contributions that are required to other infrastructure that is also being sought. Therefore, it is concerning to see that the starting point for the consideration of affordable housing is 35% of dwellings undertaken with a requirement for individual site viability analysis to be submitted where the departure from the housing target is sought. In the current economic climate, a much lower threshold as the starting point for negotiations should be set that could rise as conditions improve. It is suggested that 20% would be suitable in this regard as it would not put off landowners from bringing forward sites for development.</p>				
<p>JC Response: Partially agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Preferred Options document is based on existing technical evidence. Further work is being undertaken as part of the Strategic Housing Market Assessment (SHMA) to identify affordable housing thresholds and percentages.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4354	Mr J Dolan	Luton	Question 10	Yes
<p>Comment: The provision of affordable housing is in principle supported but this has to be undertaken viably, particularly when considered against the contributions that are required to other infrastructure that is also being sought. Therefore, it is concerning to see that the starting point for the consideration of affordable housing is 35% of dwellings undertaken with a requirement for individual site viability analysis to be submitted where the departure from the housing target is sought. In the current economic climate, a much lower threshold as the starting point for negotiations should be set that could rise as conditions improve. It is suggested that 20% would be suitable in this regard as it would not put off landowners from bringing forward sites for development.</p>				
<p>JC Response: Partially agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Preferred Options document is based on existing technical evidence. Further work is being undertaken as part of the Strategic Housing Market Assessment (SHMA) to identify affordable housing thresholds and percentages.</p>				
4328	Dr M Nasir	Caddington	Question 10	Yes
<p>Comment: The provision of affordable housing is in principle supported but this has to be undertaken viably, particularly when considered against the contributions that are required to other infrastructure that is also being sought. Therefore, it is concerning to see that the starting point for the consideration of affordable housing is 35% of dwellings undertaken with a requirement for individual site viability analysis to be submitted where the departure from the housing target is sought. In the current economic climate, a much lower threshold as the starting point for negotiations should be set that could rise as conditions improve. It is suggested that 20% would be suitable in this regard as it would not put off landowners from bringing forward sites for development.</p>				
<p>JC Response: Partially agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Preferred Options document is based on existing technical evidence. Further work is being undertaken as part of the Strategic Housing Market Assessment (SHMA) to identify affordable housing thresholds and percentages.</p>				
4347	Dr M Nasir	Caddington	Question 10	Yes
<p>Comment: The provision of affordable housing is in principle supported but this has to be undertaken viably, particularly when considered against the contributions that are required to other infrastructure that is also being sought. Therefore, it is concerning to see that the starting point for the consideration of affordable housing is 35% of dwellings undertaken with a requirement for individual site viability analysis to be submitted where the departure from the housing target is sought. In the current economic climate, a much lower threshold as the starting point for negotiations should be set that could rise as conditions improve. It is suggested that 20% would be suitable in this regard as it would not put off landowners from bringing forward sites for development.</p>				
<p>JC Response: Partially agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Preferred Options document is based on existing technical evidence. Further work is being undertaken as part of the Strategic Housing Market Assessment (SHMA) to identify affordable housing thresholds and percentages.</p>				
4333	Mr S Worts	Houghton Regis	Question 10	Yes
<p>Comment: The provision of affordable housing is in principle supported but this has to be undertaken viably, particularly when considered against the contributions that are required to other infrastructure that is also being sought. Therefore, it is concerning to see that the starting point for the consideration of affordable housing is 35% of dwellings undertaken with a requirement for individual site viability analysis to be submitted where the departure from the housing target is sought. In the current economic climate, a much lower threshold as the starting point for negotiations should be set that could rise as conditions improve. It is suggested that 20% would be suitable in this regard as it would not put off landowners from bringing forward sites for development.</p>				
<p>JC Response: Partially agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Preferred Options document is based on existing technical evidence. Further work is being undertaken as part of the Strategic Housing Market Assessment (SHMA) to identify affordable housing thresholds and percentages.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4300	Mrs Helen Stone	Leighton Buzzard	Paragraph 7.7	No
<p>Comment: Over the last few years, many of Leighton's main employers have closed or moved elsewhere i.e. Liptons, Lancer Boss, Gossards, Camdens; this has resulted in the majority (70%) of residents commuting out of town for employment. You are stating "some limited new job growth be encouraged to support the additional housing", this will only bring about a "dormitory town" status for Leighton Buzzard.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: A range of new land uses are proposed in the urban areas to support the additional housing growth proposed.</p>				
4312	Goodman	Cambridge	Paragraph 7.11	No
<p>Comment: The suggestion that unidentified 'stakeholders' consider that warehouse development should be promoted at Junction 11A, including the 'potential development of Sundon Quarry for a rail freight interchange', is completely unsupported by any evidence base. The location of Sundon Quarry has previously acknowledged major constraints in terms of access (by road and rail), landscape, ecology and contamination that serve to seriously undermine its delivery potential. In addition, it should be recognised that this broad location is identified elsewhere in the Core Strategy for residential development and same land cannot be developed twice. Logistics development on land at M1 J12 is both more deliverable and also more beneficial in terms of the resultant environmental benefits.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Core Strategy is based on evidence studies and development in the SUE will comprise a range of land uses, including residential and employment land.</p>				
4313	Goodman	Cambridge	Question 11	No
<p>Comment: The strategy recognises that the strategic distribution sector is a significant source of growth and that strategic employment sites will be developed with high levels of accessibility to the national transport network. Given the accessibility of M1 J12 by both road and rail, the failure of the Core Strategy to identify it as a development location is a major flaw and one which should be both explained and corrected.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Core Strategy is based on evidence studies to identify the most sustainable locations for employment use.</p>				
4314	Goodman	Cambridge	Question 12	No
<p>Comment: As set out in PPS12 a Local Planning Authority cannot seek to simply roll forward the provisions of an old Local Plan into a new Local Development Framework. Not only is the safeguarding of the land at Junction 10A completely unsupported by any evidence base; it also ignores the detailed alternative sites assessment that was incorporated into the 2008 planning application in respect of Goodman's land at M1 J12. On this basis, it is clear that the provisions of Policy CS10 need to be seriously reviewed in advance of the next iteration of the Core Strategy.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Core Strategy is based on evidence studies to identify the most sustainable locations for development.</p>				

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4322	Mr D Compton	Leighton Buzzard	Question 17	Yes
<p>Comment: It is noted that the JC's preferred option is to protect, conserve and enhance the quality and character of the countryside and landscape of Luton and southern Bedfordshire in accordance with the findings of the South Bedfordshire Landscape Assessments 2007 and the Environmental Sensitivity Assessment 2008. Any development should include appropriate mitigation measures to reduce the impact on the countryside in accordance with those assessments. It is considered that in relation to my client's site, whilst the SHLAA considers the site undevelopable because of its green belt and area of great landscape value, it is not clear from the assessments mentioned above whether the site has been individually assessed or the area generally. It is considered that in accordance with the second tenet of CS15, mitigation measures can be undertaken to reduce the impact of the development on this site that would not affect the quality and character of the countryside.</p>				
<p>JC Response: Not Agree Proposed Action: No Action</p>				
<p>JC Reason for Response: The Core Strategy is based on evidence studies to identify the most sustainable locations for development.</p>				

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