

**Luton & South Bedfordshire Joint Committee**

**23 October 2009**

**Agenda Item No. 5**

<b>AUTHOR</b>	<b>Joint Officer Team (David Atkinson, Joint Technical Unit)</b>
<b>SUBJECT</b>	<b>Emerging Core Strategy Public Consultation: Overview of the type of responses received and the overall levels of support and objections to its emerging contents.</b>
<b>PURPOSES</b>	<b>To set out a picture of the type of response received and broadly the overall level of support and objection.</b>
<b>RECOMMENDATIONS</b>	<b>To note the report as a overarching commentary on the type and origin of the consultation responses received together with an indication of the level of support and objection.</b>
<b>REASON FOR RECOMMENDATIONS</b>	<b>To enable the 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.</b>

**1. BACKGROUND**

- 1.1 This report provides an overarching commentary on the responses received regarding the Core Strategy and Key Diagram: Preferred Options document during the recent public consultation which ran from 17 April to 12 June 2009. This document was produced to indicate the spatial options for growth being favoured by the Joint Committee and to seek further views on these. The Core Strategy is being prepared in the context of Luton and southern Bedfordshire lying within a Growth Area as defined by the East of England Regional Spatial Strategy. The emerging Core Strategy is being prepared in the light of this reality.
- 1.2 A total of 1,452 separate individual respondents submitted a total of 1,501 responses ranging across all elements of the 'Preferred Options' version of the Core Strategy. Detailed analysis of all the representations has not identified any new substantive issues to those set out in the report on this matter received by the Joint Committee on 24 July 2009. Some submissions contain multiple responses covering a variety of topics which explains why there are more responses than respondents. Five responses derive from campaigns and take the form of, for example, petitions and multiple postcards and express views on a topic from a group.

Such responses have been treated as one record in the schedule appended to the accompanying report on this agenda with the number of signatories associated with that response clearly recorded in that schedule record. There were two standards letters commonly received but these have been individually recorded

- 1.3 This report aims to provide an overview of what the response to the consultation 'looks like' by:
- identifying where, generally, responses have come from;
  - what type of respondent took part: for example, whether they are organisations or members of the public etc;
  - providing an overview of the extent to which responses may be repeated;
  - what formats the responses take, for example, what proportions take the form of detailed statements, letters, postcards, petitions etc; and
  - providing an overview of the collective responses received from groups.
- 1.4 Appendix A includes charts that relate directly to the responses received to the nineteen online questions posed on the 'Preferred Options' document in the form of whether respondents tended to support or object to a particular element of the document. The questions were intended to help guide respondents to formulate their responses on the various chapters contained within the document (two related supplementary questions were also included in the associated Core Strategy Preferred Options Summary Leaflet that related to Chapter 4 of the document 'Spatial Strategy and Key Diagram'). The nineteen questions (including the two related supplementary questions from the summary document) are set out in Appendix C under the chapter headings to which they relate.
- 1.5 The body of the report now follows: each of the elements set out in paragraph 1.3 is taken in turn.

## **2. OVERVIEW OF THE GEOGRAPHIC DISTRIBUTION OF RESPONDENTS**

- 2.1 This section provides an overview of the geographic location where the different responses come from. It is clear from the distribution of the respondents that the majority of them originate from two of the areas that will be most affected by the proposed urban extensions. The total number of households that responded was 879. Of these a total of 608 responses originate from the area close to the preferred Direction of Growth to the East of Luton, with a total of 175 responses received from around the preferred sustainable urban extension to the East of Leighton Buzzard. Smaller numbers of respondents originate from near to the other two locations preferred for sustainable urban extensions (North of Houghton Regis and North of Luton) and some from within existing urban areas: a combined total of 96. A summary of the responses by growth location are listed in Table 1 below. See Appendix B for maps illustrating the geographical distribution of responding households.

**Table 1: Response by Growth Area**

<b>Broad location of households who responded by preferred growth location</b>	<b>Numbers of households who responded by location</b>	<b>Proportion of total household response</b>
Households near to the preferred Direction of Growth to the East of Luton	608	69.2 %
Households near to the preferred sustainable urban extension to the East of Leighton Buzzard	175	19.9 %
Combination of Households near to the preferred urban extensions to the North of Houghton Regis and North of Luton	96	10.9%
<b>Total</b>	<b>879</b>	<b>100%</b>

### 3. TYPE OF RESPONDENT OVERVIEW

- 3.1 The total of 1,501 responses received regarding the 'Preferred Option' version of the emerging Core Strategy come from a variety of respondents, including statutory consultees, private companies and individual local residents. Individuals represent the largest single respondent group, accounting for 1,326 (92%) responses (see Table 2 below). The other respondent groups are significantly smaller with with 52 (4%) coming from statutory respondents, and 35 (2%) each from key stakeholders other organisations/companies. The response received by type of respondent is set out visually in Chart 1, 'Respondent by Type', beneath Table 2 below

**Table 2: Respondent by Type**

<b>TYPES OF RESPONDENT</b>	<b>NUMBER OF RESPONDENTS</b>	<b>NUMBER INVITED TO COMMENT</b>
Statutory Consultees <sup>1</sup>	52	400
Key Stakeholders <sup>2</sup>	35	n/a
Other Organisations / Companies <sup>3</sup>	35	n/a
Individuals <sup>4</sup>	1326	n/a
<b>Total</b>	<b>1452</b>	<b>400</b>

**Notes;**

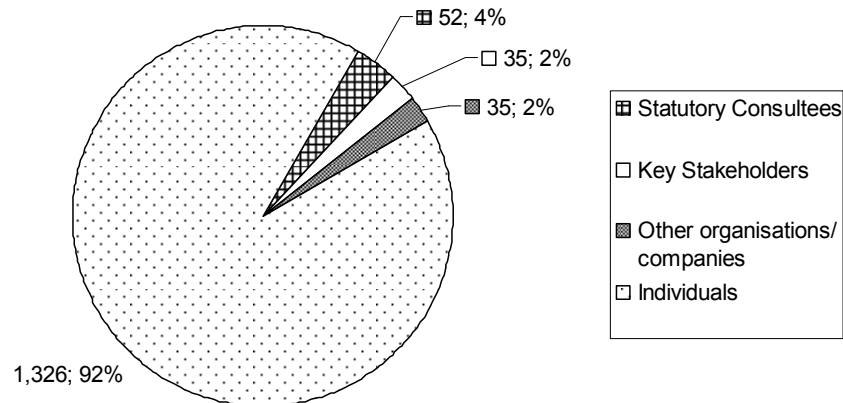
1 Parish Councils, National bodies, neighbouring planning authorities, Government advisory organisations etc.

2 Local interest groups, land owners, developers, etc

3 Of which 7 suggested they have a voluntary, community or minority role

4 A total of 199 responses are made up of a set of standard letters that are recorded as individual responses.

**Chart 1: Respondent by type**



#### **4. EXTENT OF RESPONSE REPITITION AND AN OVERVIEW OF THE TOPIC AREAS AFFECTED**

- 4.1 Some respondents sent their responses in more than one media format. For example, they may have sent them in the form of an e-mail and followed this up with a letter. The carefully undertaken processing of all the representations has ensured that where this is the case a single response has been recorded.
- 4.2 In the light of the breadth of the spatial planning topics covered by the 'Preferred Options' Core Strategy and the fact that many of these topics are closely interlinked and interdependent on each other some responses relate to several parts of the document. This is particularly the case in certain particularly interdependent topic areas. These topic areas, recorded under chapter headings for ease of reference are:
- Spatial Portrait;
  - Spatial Strategy;
  - Accessibility and Transport; and
  - Providing New Homes.

This matter has resulted in some unavoidable repetition in the detailed schedule of responses attached to the accompanying report on the agenda. This is because it is considered necessary to accurately and comprehensively record and consider the representations under all the areas of the document to which they relate.

#### **5. FORMATS OF THE RESPONSES**

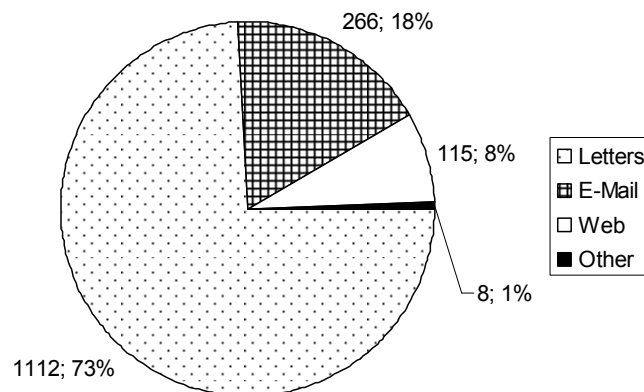
- 5.1 Respondents were able to make comments on the 'Preferred Options' Core Strategy using a variety of media formats and these are set out in Table 3 below. The collective responses comprise a collective group of representations such as a petition or other form of multiple response (see Section 6 and Table 4 below). Of the overall total number of individual responses received a total of 1112 responses (74%) were made by letter<sup>5</sup>, with 266 (18%) by e mail, 115 (8%) through the website and finally 8 (1%) others. The collective responses also include a set of responses submitted anonymously to the questions set out in the Core Strategy Summary Document. They also include 4 petitions, and 1 set of postcard responses. Each of these elements are discussed in more detail in Section 6 below together with other collective representations received from multiple respondents.

**Table 3: Responses by format**

<b>CONSULTEES &amp; RESPONSES</b>	<b>NUMBER</b>
Number of Respondents	1452
Number of Responses received	1501
<b>FORMAT OF RESPONSES RECIEVED</b>	<b>NUMBER</b>
Letters	1112 <sup>5</sup>
E-Mail	266
Web	115
Collective Responses	8
<b>Total</b>	<b>1501</b>

**Note:** 5 Includes 199 letter responses received in the form of two standard letters and recorded as individual responses.

**Chart 2: Formats of Responses**



## 6. OVERVIEW OF COLLECTIVE RESPONSES RECEIVED FROM GROUPS OF RESPONDENTS

6.1 Six sets of collective responses have been submitted representing the views of six separate groups of respondents. These are set out in Table 4 below with Chart 3 illustrating the split of individual responses within each set of collective responses as a proportion of the total collective response. Collectively these comprise the views of 6,714 individual responses. Firstly, a set of representations have been received anonymously to the questions set out in the Core Strategy Summary Document and comprise the views of 112 separate respondents, these have been split into four subsets based on whether respondents supported or objected to two questions included in the Core Strategy Summary Document. The split looks like this:

*Split of respondents who responded anonymously to Question 3 in the Core Strategy Summary Document: 'Do you support the Spatial Development Principles?'*

- 36 of the 112 respondents support the preferred Spatial Development Principles;
- 78 do not support them.

*Split of respondents who responded anonymously to Question 4 in the Core Strategy Summary Document: ‘Do you support the approach of Preferred Option CS1 – Spatial Development Strategy’?*

- 37 people supported the Spatial Development Strategy;
- 79 do not support it.

It will be noted that these four figures do not add up to 112, this is because a small number of respondents both support and do not support these two elements of the emerging Core Strategy. This small group do not specify the elements of the Spatial Development Principles and the Spatial Development Strategy they support and do not support.

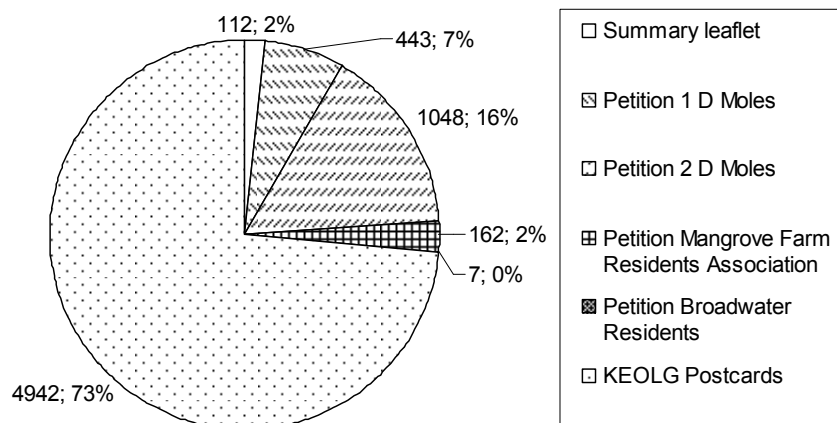
- 6.2 A total of four petitions have also been received. Two of these came under the name of D Mole and collectively comprise the views of 1,491 respondents and express their opposition to development in the area to the East of Luton particularly around Cockernhoe and Lilley. They believe this countryside should be protected as green belt. The second petition has been received from the ‘Mangrove Hall Farm Residents Association’ and this collectively comprises the views of 162 respondents, they express their opposition to development to the East of Luton. They state that the area is designated green belt and should remain so, they also feel there are areas more suitable for development and that developing in this area will give rise to traffic problems. They also have concerns about the availability of employment opportunities. The fourth petition has been received from the ‘Broadwater Residents’ and this comprises the views of 7 respondents, they consider developing to the north and north west of Luton to be preferable: these areas easier access to the M1 and other main roads, they also raise infrastructure concerns in relation to developing East of Luton.
- 6.3 One set of postcards has been received from the group ‘Keep East of Luton Green’. Collectively this comprises the views of 4,942 respondents. The cards express the respondents’ opposition to development to the area East of Luton. The respondents consider that such a development would destroy an Area of Outstanding Natural Beauty and development here would fail to assist the regeneration of the Luton, Dunstable, and Houghton Regis conurbation. They are also concerned about the amount of traffic such a development would give rise to on the edge of Luton.
- 6.4 Table 4 below sets out these responses in detail, with Chart 3 providing a visual picture.

**Table 4: Overview of the Collective Responses Received**

TYPE OF COLLECTIVE RESPONSE	HOW RECORDED	NUMBER OF INDIVIDUAL RESPONSES WITHIN EACH COLLECTIVE RESPONSE
Anonymous set of responses relating to the summary leaflet	Recorded as four sub-sets of responses relating to two questions from Core Strategy Summary Document	112

Petition submitted under the name: D Moles	Recorded under name: D Moles	443
Petition submitted under the name: D Moles	Recorded under name: D Moles	1048
Petition submitted on behalf of 'Mangrove Hall Farm Residents Association'	Recorded as Organisation	162
Petition submitted on behalf of 'Broadwater Residents'	Recorded as Organisation	7
Set or postcards submitted under the name: 'Keep East of Luton Green'	Recorded as Organisation	4942
<b>Total</b>		<b>6714</b>

**Chart 3: Overview of Individual Responses incorporated within Collective Responses**



## 7. FINANCIAL IMPLICATIONS

- 7.1 There are no direct financial implications as a consequence of the public consultation response. However, the manner in which they are used in progressing the LDF, in terms of spatial development allocations including sustainable strategic urban extensions, for example, could have financial implications for the delivery of the LDF. These implications were agreed by the Finance Manager (Environment and Regeneration) on 8 October 2009.

## 8. LEGAL IMPLICATIONS

- 8.1 This is a non-statutory part of the plan-making process and there are no associated legal implications for the Joint Committee. These implications were agreed by John Secker, Legal Services, Luton Borough Council on 8 October 2009.

## **9. EQUALITIES IMPLICATIONS**

- 9.1 The 'Preferred Options' Core Strategy has been subjected to an Equalities Impact Assessment to identify the contribution its contents can make towards achieving acknowledged equalities issues across Luton and southern Bedfordshire.

## **APPENDICIES**

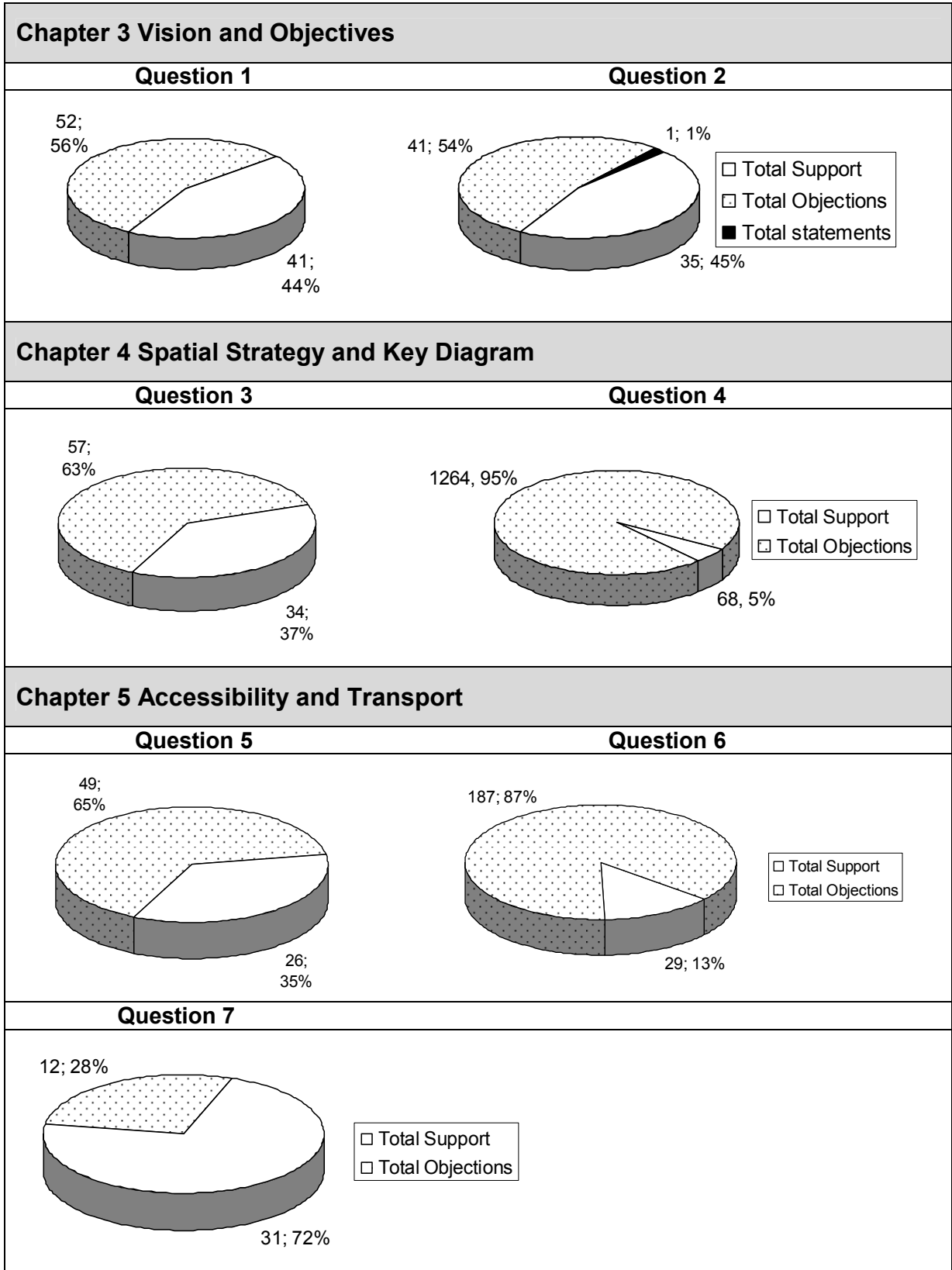
**Appendix A** – Luton and South Bedfordshire Core Strategy and Key Diagram: Preferred Options Public Consultation Analysis: Quantitative Overview of Responses Received, by topic, and associated online respondent guiding question

**Appendix B** – Maps illustrating the geographic distribution of responding households

**Appendix C** – The Online Respondent Guiding Questions by 'Preferred Options' document chapter

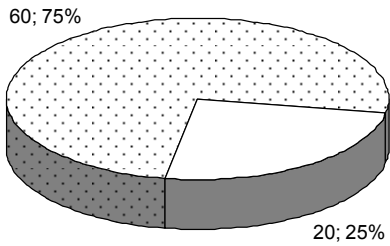


**Appendix A - Luton and South Bedfordshire Core Strategy and Key Diagram: Preferred Options Public Consultation Analysis: Quantitative Overview of Responses Received, by topic, and associated online respondent guiding question.**

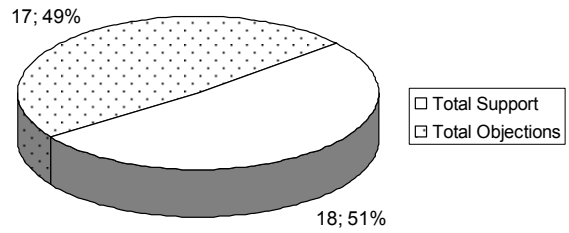


## Chapter 6 Providing New Homes

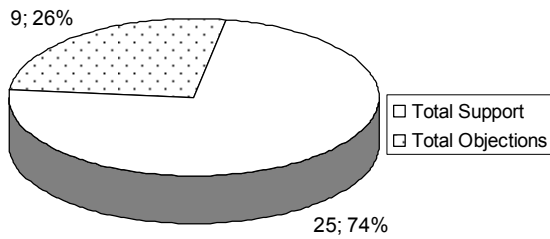
### Question 8



### Question 9

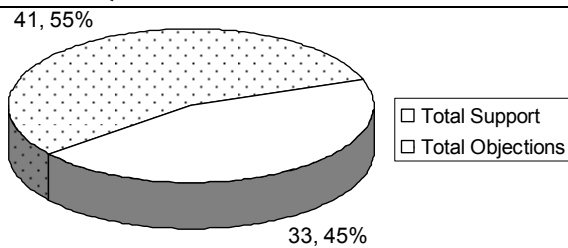


### Question 10



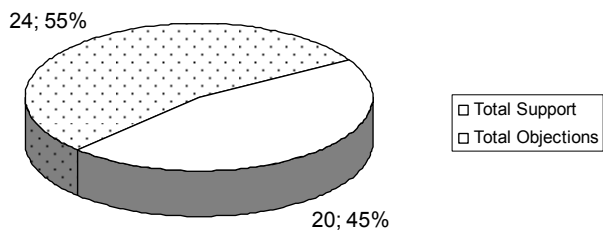
## Chapter 7 Our Economic and Employment Needs

### Question 11



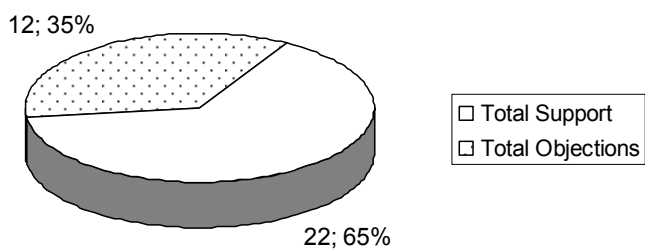
## Chapter 8 Building Communities

### Question 12



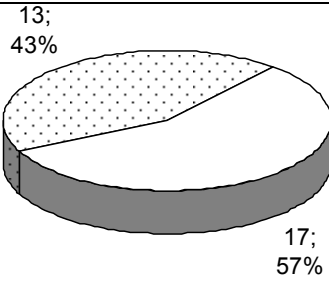
## Chapter 9 Improving the Town Centres

### Question 13

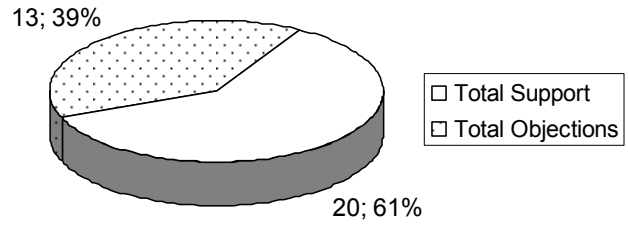


## Chapter 10 Adapting to and Mitigating Climate Change

**Question 14**

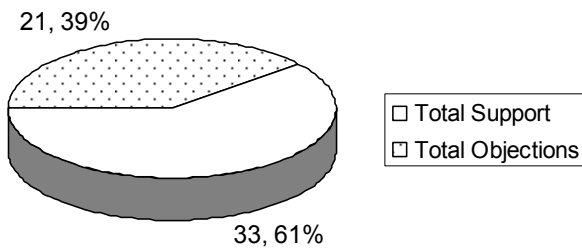


**Question 15**



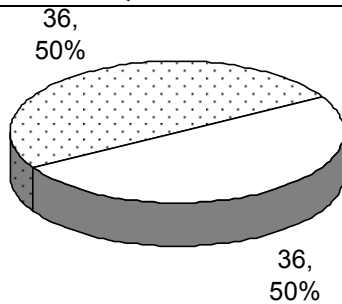
## Chapter 11 Green Infrastructure and Space

**Question 16**

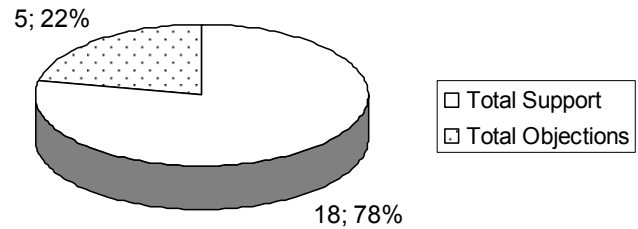


## Chapter 12 Preserving and Enhancing our Countryside and Heritage

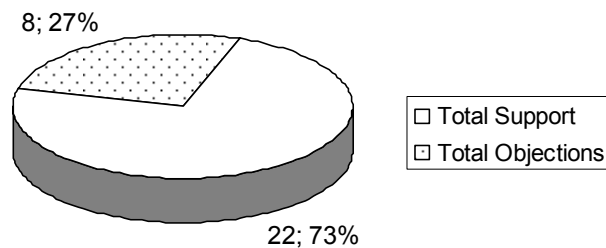
**Question 17**



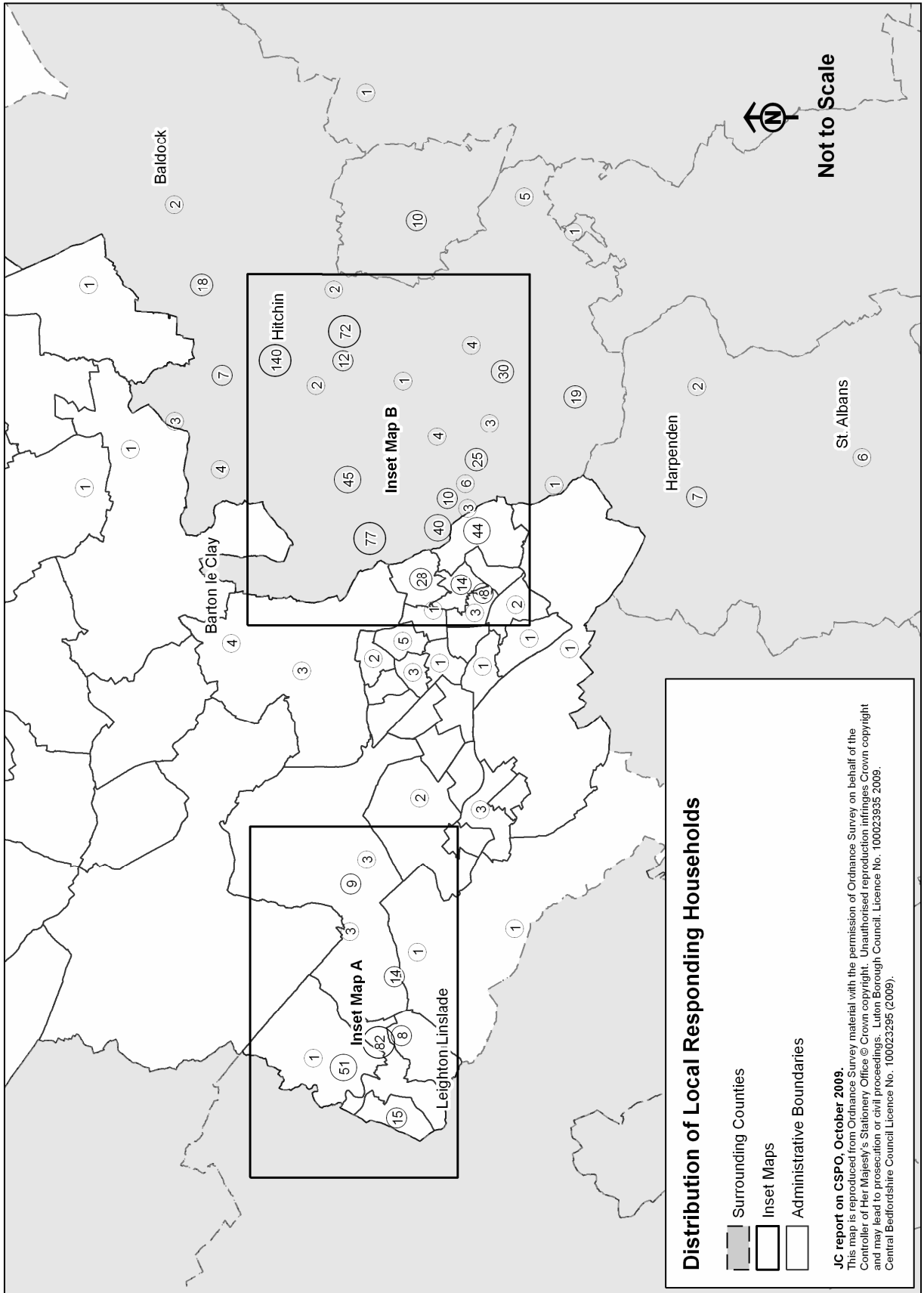
**Question 18**

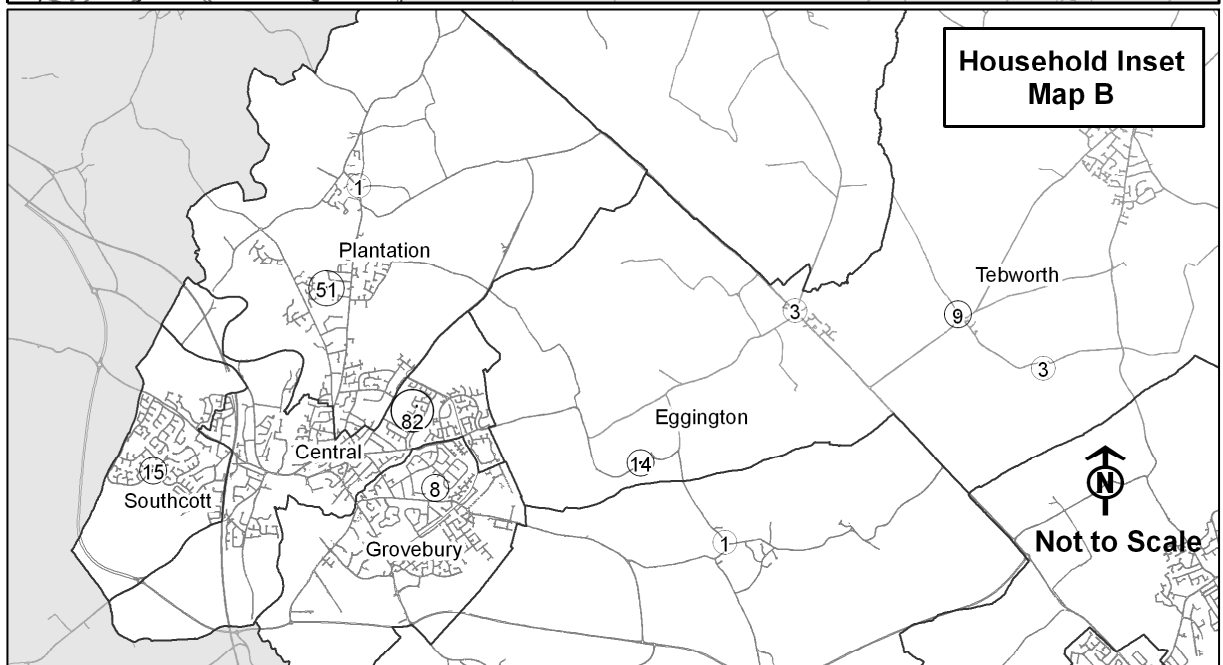
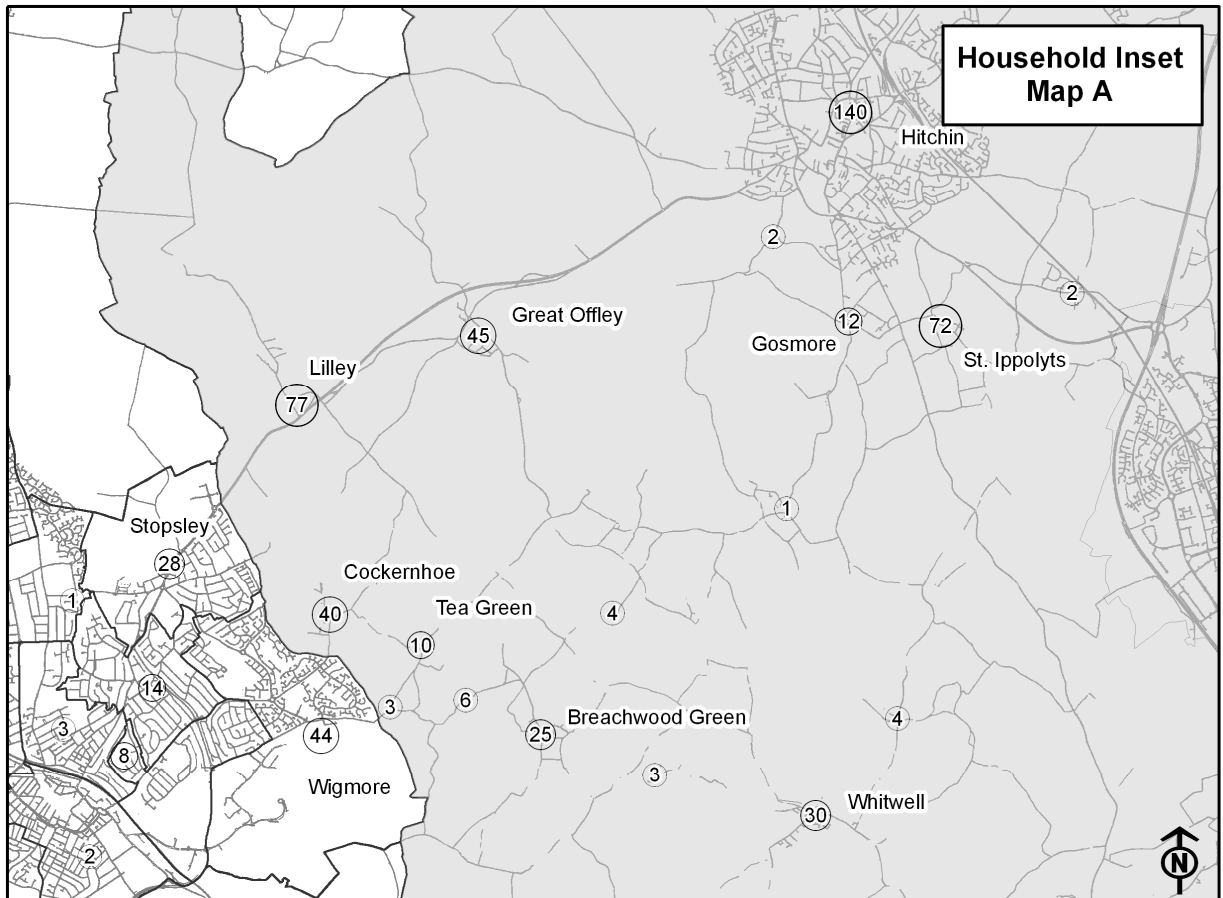


**Question 19**






**Appendix B – Maps illustrating the geographic distribution of responding households**





**Local Responding Households Inset Maps A and B**

-  Administrative boundaries
-  Road network
-  Buckinghamshire/Hertfordshire

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## Appendix C – The Online Respondent Guiding Questions by ‘Preferred Options’ document chapter

1. **Introduction**
2. **Spatial Portrait**
3. **Vision and Objectives**
  - *Associated guiding questions: Do you support the Spatial Vision for Luton and South Bedfordshire;*
  - *Do you support the Strategic Objectives for Luton and southern Bedfordshire*
4. **Spatial Strategy and Key Diagram**
  - *Associated guiding questions: Do you support the Spatial Development Principles?*
  - *Do you support the Spatial Development Strategy and Key Diagram? (\*NB Two Questions covering the same ground were also asked in the ‘Core Strategy: Preferred Options Summary Document’)*
5. **Accessibility and Transport**
  - *Associated guiding questions: Do you support the proposals for strategic transport infrastructure?*
  - *Do you support the proposals for strategic highway transport infrastructure?*
  - *Do you support the proposals for maximising sustainable travel?*
6. **Providing new Homes**
  - *Associated guiding questions: Do you support the proposals for the proposed housing targets?*
  - *Do you support the delivery of a constant supply of housing land?*
  - *Do you support the provision of housing for all needs?*
7. **Our Economic and Employment Needs**
  - *Associated guiding question: Do you support the proposals for providing and supporting employment framework?*
8. **Building Communities**
  - *Associated guiding question: Do you support the proposals for providing social and community infrastructure in Luton and southern Bedfordshire?*
9. **Improving the Town Centres**
  - *Associated guiding question: Do you support proposals to improve town centres in Luton and southern Bedfordshire*
10. **Adapting to and Mitigating Climate Change**
  - *Associated guiding questions: Do you support the proposals for resource efficiency measures in Luton and southern Bedfordshire?*
  - *Do you support the proposals for flood mitigation measures in Luton and southern Bedfordshire?*
11. **Green Infrastructure**
  - *Associated guiding question: Do you support proposals for green infrastructure and green space within Luton and southern Bedfordshire?*

**12. Preserving and Enhancing our Countryside and Heritage**

- *Associated guiding questions: Do you support proposals to protect, conserve and enhance countryside and heritage?*
- *Do you support the proposals concerning heritage and townscape in Luton and southern Bedfordshire?*
- *Do you support the proposals to protect and enhance biodiversity and geology within Luton and southern Bedfordshire?*