

Mr. A. S. Barker
Area Planning Officer (North)
Aylesbury Vale District Council
66 High Street
Aylesbury
Buckinghamshire
HP20 1SD

Your ref: ASB/10/00500/AOP
Our ref: CB/10/00859/FULL
Date: 2 June 2010

Dear Mr. Barker

Proposed mixed use development including residential (C3) - some 900 dwellings - employment (B1), commercial (A1, A2, A3, A4, A5), primary school, health centre (D1), leisure and community (D2) land uses and associated roads, drainage, car parking, servicing, footpaths, cycleways, public open space/informal open space and landscaping on land at Valley Farm, Leighton Road, Soulbury

Thank you for your letter dated 18th May 2010 (received on 24th May 2010). In respect of the points raised therein, I would comment as follows.

With regards to the new Government's stated intention to abolish regional housing targets, at the time of writing it is not entirely clear what impact this new national policy will have on the emerging Core Strategy for Luton and southern Bedfordshire. It is quite possible that the 'Policy' section below is already out of date.

Policy

It might be helpful if I set out the background to the Core Strategy Preferred Options (CSPO) document published for consultation in April 2009

The 'growth agenda' referred to in the document has been set by Government through the Sustainable Communities Plan (2003) which made Luton and southern Bedfordshire part of one of four growth areas in the east and south east of England. In this area these proposals were elaborated through the (March 2005) Milton Keynes and South Midlands Sub-Regional Strategy (SRS). The SRS identifies the Luton/Dunstable/Houghton Regis/Leighton-Linslade urban areas as a housing growth area and Policy 2(b) sets a minimum housing requirement of 26,300 for the growth area to 2021. The later (May 2008) East

of England Plan (EEP) Policy H1 takes account of completions between 2001 and 2006 and identifies the residue minimum requirement for 2006-2021 as 21,900.

In 2007, a consultation exercise was undertaken on a Core Strategy Issues and Options Paper which set out various strategic spatial options to secure the implementation of the growth allocated to this area. Valley Farm formed part of one of 13 potential areas for development. The 13 sites were only broad areas of search and did not indicate in any way preferred locations for development and did not indicate that Valley Farm was in any way preferable to other locations. It follows that no weight should be given to the application site being identified as a potential area for development.

The CSPO document is the next stage in the process and sets out the spatial development principles and preferred policy approaches for delivering growth.

In existing urban areas opportunities exist for new development, particularly residential, thereby minimising development in the countryside. An 'urban area first' principle is therefore preferred. Development would be focused on the 'main conurbation' of Luton/Dunstable/Houghton Regis because most existing services and facilities are located there and it also offers the greatest potential for efficient public transport use and new employment. Leighton-Linslade would benefit from new development at a smaller scale as it represents a smaller urban area with fewer services and facilities. The emerging Core Strategy states that 60% of all new residential development should be in existing urban areas up to 2021, with 40% thereafter up to 2031. Indeed, up to the year 2012/13, most new residential development will be in those areas.

Evidence shows that not all development needed can be delivered within existing urban areas. Therefore, sustainable urban extensions are the preferred means of delivering the rest. The Council considers the most sustainable form of urban extension are those with sufficient 'critical mass' to function in a way that ensures they do not place unreasonable burdens on existing or new infrastructure. They should also contribute to serving the needs of existing communities within adjacent urban areas where infrastructure deficits exist. Whilst this approach may take a little longer to deliver because larger urban extensions tend to be more complex and time consuming to bring forward, the Council considers it preferable to identify a small number of large scale sustainable urban extensions than to release a larger number of non-strategic, smaller urban extensions that will be unlikely to deliver appropriate amounts of supporting infrastructure. Allied to this is a key aim of the emerging Core Strategy to secure the regeneration of existing urban areas, particularly Luton which has significant areas of deprivation.

Following earlier consultation and analysis of evidence, three preferred urban extensions and one preferred direction of growth have emerged. The three preferred urban extensions are:

- North of Houghton Regis, delivering around 7,000 homes;
- North of Luton, delivering around 4,000 homes; and

Central Bedfordshire Council

Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ

Telephone 0300 300 8000

Email customer.services@centralbedfordshire.gov.uk
www.centralbedfordshire.gov.uk

- East of Leighton Buzzard, delivering around 2,500 homes.

The preferred direction of growth lies to the east of Luton. This is mainly within North Hertfordshire District and would therefore be planned for through their Core Strategy. The LDF Planning Authority, the Luton and South Bedfordshire Joint Committee, considers that 5,500 new homes should be delivered in this area.

Central Bedfordshire Council recognises that in light of a recent Luton Borough Council decision, development to the East of Luton is not supported by the Borough Council. This is not the position of the Joint Committee. However, as development would not deliver dwellings to the East of Luton until 2016 to 2017, and then initially only 100 dwellings within this period, the decision by the Borough Council does not impact upon the deliverability of housing in the short term.

Turning to Valley Farm, Paragraph 84 of the SRS envisages that Leighton-Linslade will have to make an “*appropriate contribution*” towards growth. It is recognised in the SRS that there will be a need for a review of the Green Belt around the built-up area to accommodate urban extensions and SRS Policy 2(b) provides for such a review. It is important to note, however, that the review is to be undertaken through Local Development Documents (Policy 2(a) and paragraph 88) and not ad hoc releases of Green Belt and other rural land through development control decisions.

The application site was put forward by the applicants as a possible urban extension, but was rejected in favour of a more sustainable urban extension to the east of the town. There is nothing within the SRS or the EEP to indicate that the application site is a more appropriate urban extension than that proposed or that any such extension should come forward other than through an Local Development Document. As mentioned above, the strategy of accommodating growth in sustainable urban extensions provides an opportunity to enhance the infrastructure of the growth area; an opportunity that is wasted by smaller ad hoc urban extensions.

Whilst paragraph 88 of the SRS envisaged that construction on one or more urban extensions should start by 2009, that has clearly been overtaken by the recession and commencement is now expected somewhat later. Notwithstanding this situation, the Council is confident of meeting the 26,300 minimum requirement by 2021.

The Council considers that approval of this planning application could potentially delay the delivery of sites to the south and east of the town which are needed to provide a constant supply of new housing as well as critical new community infrastructure for the town. As a result, it would conflict with the emerging planning objectives and spatial vision for a more self-contained Leighton-Linslade, as identified in the CSPO document.

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Priory House, Monks Walk
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Bedfordshire SG17 5TQ

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Email customer.services@centralbedfordshire.gov.uk
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Environmental, economic, social and community infrastructure

Landscape

Whilst the application site is located outside the Central Bedfordshire boundary, the landscape is continuous; the form and character has guided development in the past and should continue to direct development now to determine where development is or is not appropriate and to ensure growth fits within the landscape context. The western settlement edge of Linslade is well contained by the landform and vegetation/tree cover in the adjacent countryside. The Council considers that the proposed development to the west of Linslade will be seriously detrimental to the existing character and quality of the local landscape, detract from the rural settings of settlements and impact on the amenity value of the local countryside.

Employment

The Luton and South Bedfordshire Joint Employment Land Review (January 2008) advises that the main conurbation will be the primary employment location and is likely to attract the majority of jobs. The future scale of expansion at London Luton Airport would be a significant employer and influence on the employment opportunities over the plan period. New strategic employment locations would be promoted around the proposed M1 Junction 11A and near to the airport. Whilst some limited new job growth would be encouraged at Leighton-Linslade to support the additional housing proposed there, the application site was not identified as the preferred location for new employment land in the Employment Land Review, primarily due to its location at the rear of an existing housing development and in sensitive landscape which makes access difficult and raises concerns about potential visual impact. Direct access onto/from the Linslade Western Bypass would be needed to make the site more appealing for employment uses and any development is likely to be modest, given the limited scale of the site and the limited employment market in Leighton-Linslade.

Education

The new scheme would incorporate the provision of a primary school on site to serve the development (that would have its own catchment area) and financial contributions, appropriate to the scale of the development, would be made to satisfy both secondary and special education needs off site. There would be limited, if at all any, surplus capacity at any of the nearby middle or upper schools in Central Bedfordshire to accommodate pupils from the proposed development, as any existing surplus is expected to be absorbed by the additional pupil yield from both existing and future planned developments in the Leighton-Linslade area.

Sustainable Transport

There are a number of concerns in respect of cycling, public transport and the travel plan.

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Bedfordshire SG17 5TQ

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Email customer.services@centralbedfordshire.gov.uk
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Cycling – Primary access off Leighton Road

- The shared footpath/cycleway on either side of the access would be discontinuous and a realignment of Leighton Road would be necessary to facilitate continuous length.
- The proposal does not indicate how cyclists would transfer from the cycleway to the highway, nor does it explain why cyclists wishing to go towards Soulbury would have to divert into the estate in order to go straight on.
- The cycleway should also extend down the hill towards the town, as well as providing a continuous link to the railway station.
- There appears to be a lack of connectivity to the north west
- If a signalised access is preferred, advance stop lines would be necessary to give cyclists the advantage. However, a ‘continental’ style roundabout with single lane entry and zebra crossings on all four arms would be more attractive to cyclists and pedestrians.
- Cyclists are allowed to use the road and it should be designed to allow this to happen safely. The junction design fails to incorporate features that result in naturally lower speeds and a safe environment for cyclists and pedestrians. The use of right turn lanes is one shortcoming.
- The separate bus access should also accommodate cyclists and may be a preferred option, although the discontinuous cycle route would remain.

Cycling – Secondary access off Derwent Road

- The design of the access should be revisited in the context of *Manual for Streets* which would suggest that the proposed visibility splays would be excessive in this location and would encourage higher speeds.
- In terms of promoting sustainable travel, Derwent Road has the potential to be an extension to the site. Measures should be introduced in Derwent Road to encourage 20mph speeds, for example, actual road humps rather than the virtual option proposed and a school safety zone to facilitate safe and sustainable travel to the lower school and beyond.
- Given the site’s proximity to the internal path network across Bideford Green to the railway station, cyclist and pedestrian access from the site should be a priority at the Derwent Road junction, although it is not clear whether the access would be of sufficient width to provide an attractive and safe opportunity for cycling and walking.
- There should be enhancements to the roadside footpath network, in particular to address the lack of an adequate footpath along Derwent Road. Financial contributions should be made towards upgrading the existing internal footpath network to cycle route standard. This network is not public highway, but the responsibility of the Southcott Management Company Limited, so some negotiation would be required.
- There is a lack of clarity about management of the secondary access, as it has the potential to encourage ‘rat running’ and cause problems at the Bunkers Lane/Wing Road junction which is now working well as a mini roundabout that supports cycling use and slows down traffic. The secondary access should be for sustainable travel modes only therefore facilitating these modes rather than the car.

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Chicksands, Shefford
Bedfordshire SG17 5TQ

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- If the development is to maximise the opportunities available for sustainable travel, enhancements to the interchange facilities at the railway station should be considered. This would include improvements to the existing railway footbridge and bus facilities.
- With regard to on-site provision, whilst designs that encourage lower speeds are supported, the needs of more vulnerable road users, such as schoolchildren, must be taken into account. There is concern that whilst a number of routes through the development would be designated 'pedestrian only', only one would be a 'cycleway'. All segregated routes should be open to all in order to maximise the potential for cycling. The one off-road route is to the west of the site, ignoring the fact that all of the key destinations are to the east.

Public transport

- The bus strategy is inadequate due to the nature of the existing service which does not provide direct access to the town centre. It would likely discourage residents from using public transport.
- A direct, bespoke bus service is required, travelling along the Soulbury Road corridor only, for commuters using the railway station and facilitating access to the town centre. The applicants would be expected to provide this service and it should run from 6.00am to 9.00pm with frequencies of 20 minutes in the peak and 30 minutes off peak from commencement of development and frequencies of 15 minutes and 20 minutes upon full occupation. The service would need to incorporate real time technology and financial contributions towards enhancing bus infrastructure along Soulbury Road would be required in addition to the necessary waiting facilities within the development.

Travel plan

- The framework travel plan falls short in terms of a commitment to provide everything that is deemed necessary to encourage sustainable travel from/to the site. The management of this is crucial to mitigate the traffic that would otherwise be generated and a more detailed travel plan should be submitted and secured as part of this planning application.
- The travel plan is also deficient in terms of the setting of targets in that this Council would expect a target of a 20% reduction in single occupancy car use over and above the baseline figure referred to in the Transport Assessment rather than a target to achieve that baseline figure only.
- There is a lack of clarity about how the different uses on the site would be dealt with in terms of travel plan obligations and about the role of the travel plan co-ordinator to manage the whole.

Countryside Access

General Comments

- The proposed open space, country park, woodland planting and other informal spaces appear to be sufficient for a development of this size, although the masterplan is obviously locating these areas where there are considerable constraints rather than where there has been assessment of

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need/deficiencies.

- Development of this size would place additional pressure on the existing green infrastructure around Leighton-Linslade. The Council refutes the suggestion in the '*Open Space and Recreation Technical Appendix*' that there would be only a 'minor' increase in residents using Linslade Wood. All user surveys and countryside data suggest that people want to use established landscape areas (due to their longstanding beauty, topography, etc.) for their informal recreational enjoyment and it would take time for users to change habits and to be attracted to newly laid out and planted provision. New residents may use the new 'country park', however, they are more likely (especially those in the north of the development) to use existing facilities – namely Linslade Wood and Stockgrove Country Park.

Country Park

- In order for the applicants' 'offer' to be credible, the Council needs to see much more detail on the quality of provision on this site. The Council would suggest that if the site is to be considered as 'country park' standard, it should be expected to conform to Natural England's 'Green Flag' standards.

Access Routes and Rights of Way

- The access routes (footpaths and cycle ways) in some areas are sufficient. However, there is a need to provide more access, particularly bridleway access, which is an acknowledged deficit in the area. The Council would like to see the route to the north east into Linslade Wood to be provided to a full multi-user standard, that is, access should be sufficient for walkers, cyclists and horse riders. The Council would expect to see a Pegasus crossing provided on the B4032. Given appropriate highways design, this should be achievable.

Existing sites

- There are a number of important Council-owned countryside sites which are in close proximity (15 minutes drive) to the proposed development – Linslade Wood, Stockgrove Country Park and Tiddenfoot Waterside Park. Based on surveys, it is estimated that at least 30% of the new residents would visit these sites.
- The Council is particularly concerned about the impact this development would have on Linslade Wood (both the community woodland and the ancient woodland). The development proposes a number of properties to be built in the adjacent field and with access routes from the development into Linslade Wood. The applicants should provide a wider landscape buffer between the housing and the wood. Furthermore, substantial S106 contributions should be offered to enable the wood to deal with the increased demand.
- Stockgrove Country Park will come under increased pressure throughout the development (particularly until all elements of the proposed 'country park' are provided) and even once the development is complete. Stockgrove Country Park is an established country park which comprises 80 acres including a SSSI, lakes, marshes, ancient oak woodlands and

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Bedfordshire SG17 5TQ

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Email customer.services@centralbedfordshire.gov.uk
www.centralbedfordshire.gov.uk

meadows. It will always be popular and visitor forecasts suggest that visitor numbers, including visitors from new developments, will continue to grow.

S106 Contributions

- PPG17 is clear that planning obligations may be used as a means to remedy local deficiencies in the quantity or quality of open space and countryside recreational provision. A suite of contributions would have to be provided to mitigate the impact that this development would have on the countryside and particularly those sites which would be under greater pressure. These improvements can only be achieved by means of S106 obligations to improve countryside access.
- If granted permission on appeal, the proposed 'Stoke Road' development (adjacent to the eastern boundary of Linslade Wood) would deliver significant contributions towards Linslade Wood and the Leighton-Linslade Green Wheel proposals.

Conclusion

- The proposed development would put the Council's countryside facilities under pressure. It would take a significant number of years before the proposed 'country park' could compare with the existing facilities at Linslade Wood and Stockgrove Country Park
- The open space and 'country park' would have to be provided early in the phasing. Delay in providing such green infrastructure should have a bearing on the amount of funds provided through the S106 obligations to support the other sites.

Sewerage system

Anglian Water Services Limited comments as follows.

- There are assets owned by AW or those subject to an adoption agreement within or close to the site boundary that may affect the layout of the development.
- There is sufficient water resource capacity to supply the development. However, AW would wish to see measures taken by the applicants to ensure that the proposed buildings are constructed to high water efficiency standards to minimise growth in demand for water from the new development and help ensure sustainable use of the region's water resources.
- The proposed development could not be supplied from the water supply network that at present has inadequate capacity.
- The foul sewerage system could not accommodate flows from the development. AW is not aware when capacity will become available, but this is unlikely to be within the standard planning permission timescales. If development proceeds before further capacity is provided, it is possible that this would result in environmental and amenity problems downstream.
- The foul drainage from the proposed development would be treated at Leighton-Linslade Sewage Treatment Works (STW) that at present has not got available capacity for these flows. Whilst the STW has sufficient

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consented dry weather flow capacity, process capacity is a constraint. As the site is currently environmentally compliant, AW would have no plans for process upgrades during the next charging period.

From copies of documents sent to me I understand that you are aware of comments made by The Greensand Trust, NHS Bedfordshire, Natural England, Sport England and Voluntary and Community Action Central Bedfordshire.

I will advise you of further consultation responses received as soon as I am able.

Yours sincerely

C. J. Murdoch
Senior Planning Officer

Direct telephone 0300 300 5305

Email chris.murdoch@centralbedfordshire.gov.uk

Please reply to:

Central Bedfordshire Council

Council Offices

High Street North

Dunstable

LU6 1LF

Central Bedfordshire Council

Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ

Telephone 0300 300 8000

Email customer.services@centralbedfordshire.gov.uk
www.centralbedfordshire.gov.uk