

**Luton and South Bedfordshire Joint Committee**

**23 July 2010**

**Agenda Item No. 7**

<b>AUTHOR</b>	<b>Joint Officer Team (Graeme Markland, Joint Technical Unit)</b>
<b>SUBJECT</b>	<b>Core Strategy Public Consultation: Overview of misplaced responses and informal representations on the West of Luton (Bushwood) proposal</b>
<b>PURPOSES</b>	<b>To add to the known responses received to the Preferred Options Core Strategy of April 2009 and indicate the emerging level of support or objection to Bushwood.</b>
<b>RECOMMENDATIONS</b>	<b>To note the report as an amendment to Agenda item 5 of the 23 October 2009 Luton and South Bedfordshire Joint Committee 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 addendum to that previously given to the Luton and South Bedfordshire Joint Committee on 23 October 2009 on the responses received to the Core Strategy and Key Diagram: Preferred Options document. This public consultation was held between 17 April and 12 June 2009. It also reports informal representations received on the developer-proposed Bushwood (West of Luton) urban extension.
- 1.2 During the Preferred Options consultation some 1,501 responses were received from members of the public and stakeholders. However, it became evident in April 2010 that a number of representations were missing from the detailed schedule of comments received. This document had been attached as an appendix to the original agenda item on 23 October 2009. It was established that 14 responses sent to the JTU via e-mail had wrongly been identified as duplicates of originals received by other means. In retrospect it can be seen that the risk of confusion was high as e-mails were addressed to a variety of individuals within the Joint Committee (JC) Councils rather than the one created for the purpose.

- 1.3 The 14 misplaced responses have now been analysed and JC responses proposed in an identical way to those originally reported. An update on the original consultation analysis is given below.
- 1.4 Following the Preferred Options consultation a motion was raised – and lost - to remove the East of Luton SUE from the Core Strategy at the 23 October 2009 JC meeting. The suggested JC responses and associated proposed actions recorded in the detailed schedule of comments were therefore approved.
- 1.5 However, at Luton Borough Council's (LBC's) Full Council meeting on 3 November 2009 a similar motion was proposed to remove the proposed housing development East of Luton. This motion was passed. At LBC's Executive meeting on 7 December this resolution was confirmed and a motion passed to instruct the JC that Luton Borough Council's response to the Core Strategy should be amended to reflect this decision.
- 1.6 Since the Preferred Options stage the promoters of the Bushwood proposal, the Luton and Central Bedfordshire Economic and Development Partnership have been undertaking consultation and meetings to promote their scheme. This relates to the area of land bounded by Hatters Way and Slip End village north-south and the M1 and Caddington village east-west. They have been active in terms of hosting or attending public events, distributing leaflets and promoting the scheme in the local press.
- 1.7 A campaign group called CaSE4 has formed in the Caddington and Slip End area to coordinate objections to the proposals. This group has organised petitions, postcard campaigns and hosted meetings.
- 1.8 Both the Bushwood promoters and CaSE4 have encouraged supporters or objectors to send correspondence indicating support or objections to the Joint Committee. This has been an informal exercise and has not been encouraged by either the JC or the Joint Technical Unit (JTU). To date a considerable amount of correspondence has been received. To help inform Members about how the local community is responding to the Bushwood proposal a report on the correspondence received by the JTU can be found at 6) below.

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

- 2.1 Of the 14 misplaced representations 7 were from identifiable households and all of these were within Leighton Linlade. This is not unexpected as a very high proportion of all e-mail responses received were from Leighton Linlade residents.

**Table 1: Response by Growth Area**

Broad location of households who responded by preferred growth location	Number of households who supplied addresses		Proportion of total known household response
	Misplaced response	+ previous households	
Households near to the preferred Direction of Growth to the East of Luton	0	608	68.6%
Households near to the preferred sustainable urban extension to the East of Leighton Buzzard	7	182	20.6%
Combination of households to the North of Houghton Regis and North of Luton	0	96	10.8%
<b>Total</b>	<b>7</b>	<b>886</b>	<b>100%</b>

### 3 TYPE OF RESPONDENT OVERVIEW

- 3.1 It is now known that 1,515 responses were received from 1,462 individuals or organisations. Of the 14 newly examined 5 were from individuals with land interests via 2 agents. One response was from the campaign group Keep Hitchin Special and one given as being on behalf of 10 local residents. The remaining 7 were from local residents. The new totals and proportions are detailed in Table 2.

**Table 2: Respondent by Type**

Types of Respondent	Number of Respondents	Respondent by Proportion
Statutory Consultees <sup>1</sup>	52	3.5%
Key Stakeholders <sup>2</sup>	40	2.7%
Other Organisations / Companies <sup>3</sup>	36	2.5%
Individuals <sup>4</sup>	1334	91.3%
<b>Total</b>	<b>1462</b>	<b>100%</b>

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.

- 3.2 It is certain that none of the recently analysed responses have been repeated in other formats and have therefore not been previously recorded.

## 4 FORMATS OF THE RESPONSES

- 4.1 All 14 responses received were e-mails, one a group petition that has been recorded as a collective response. These make a negligible difference to the proportions of responses received by format.

**Table 3: Responses by Format**

<b>Consultees &amp; Responses</b>	<b>Number</b>
Number of respondents	1,452
Number of responses received	1,515
<b>Format of Responses Received</b>	<b>Number</b>
Letters	1,112 <sup>5</sup>
E-Mail	279
Web	115
Collective Responses	9
<b>Total</b>	<b>1,515</b>

<sup>5</sup> Includes 199 letter responses received in the form of two standard letters and recorded as individual responses

## 5 OVERVIEW OF RESPONSES RECEIVED

- 5.1 The 14 respondents made 61 comments. The proposed response from the JC is that we disagree with 37 of the comments, agree with 7 and either partially agree or neither agree or disagree with the remaining 17.
- 5.2 The individuals did not raise any comment that has not already been reported. The e-mail forming a collective objection from 10 residents of Leighton Buzzard came under the name of Alison Nash. In addition to points already raised their statement includes their belief that the market town character will be lost. They believe the amount of housing to be built is disproportionate and the green space to be provided is not recompense for the loss of green belt. They also state the associated consultation with local residents was inadequate.
- 5.3 The five representations sent on behalf of land owners commonly contain objections to their land not being named as discrete urban extensions. Among other comments made they state that reserve sites should be identified with a trigger mechanism agreed for when to bring them forward. Some believe that the threshold for affordable housing provision should initially be set low with provision increasing as the state of the national economy improves.

## 6 INFORMAL RESPONSE RECEIVED REGARDING THE BUSHWOOD (WEST OF LUTON) PROPOSAL

- 6.1 The scale of support or objection to the Bushwood proposal is outlined below. An assessment of the main reasons for individuals supporting or objecting to the scheme is also given.

**Table 4: Support for or Objections to the Bushwood Proposal**

<b>Response by Format</b>	<b>For</b>	<b>Against</b>
Letter	12	36
E-Mail	2	12
Leaflet Slip	117	N/A
Petition	1,813	273 <sup>6</sup>
Postcards	N/A	2,083
<b>Total</b>	<b>1,944</b>	<b>2,404</b>

<sup>6</sup> Signed using the Number10.gov.uk e-petition system. At least one other CaSE4 petition exists but has not yet been submitted to the JC.

### **Support for Bushwood**

- 6.2 The campaign for the Bushwood proposal has generated 12 letters of support. Five of these are form letters sent by the Dallow School of Sport, the Dallow Development Trust Ltd, Shantona Womens Group, the Lotus Health Clinic and the Dallow Business Partnership. This letter states they have considered the proposal in relation to their organisations and wish to register support. They believe it to be a positive scheme that will be funded without burden to the public finances. They list perceived positives of the scheme, for example job and housing creation, the provision of sports facilities and the promotion of sustainable travel.
- 6.3 One letter was sent by the Bury Park Business Corporation. The remaining 7 were from groups representing the Turkish, Irish and Islamic communities and the Gaelic Athletic Association. The community groups support the scheme and the Luton Irish Forum make particular reference to the provision of a Gaelic Centre. Generally they groups see the development as being positive in helping develop the community. The Islamic Cultural Society and the Luton Bury Park Business Corporation refer to the benefit of moving LTFC which will give opportunities for local regeneration proposals.
- 6.4 The two e-mails received in support were from residents of Tilsworth and Shillington. They see the development as being positive as all the required infrastructure of a community will be provided on site, particularly for those with special needs.

- 6.5 There were 117 tear-off slips received that had formed part of a leaflet promoting the scheme. This has the statement “I would like to pledge my support for the new community proposals at Bushwood to the West of Luton as a preferred location for growth”. These have not been analysed for geographic distribution but it addresses from across Luton are represented. Some households have sent multiple responses.
- 6.6 The petition with 1,813 signatories supporting the Bushwood proposal is titled: “Support for the Relocation of Luton Town Football Club to a More Appropriate Site”. A statement follows that describes how residents of Dallow and Biscot wards believe that the proposal for a new stadium is a “golden opportunity” that would “enable Bury Park (sic) to be released for Regeneration work to improve the quality of life and well being of the local communities, residents and business”.

### **Objections to Bushwood**

- 6.7 With the exception of a representation from Markyate Parish Council, the letters against the Bushwood proposal came from local residents. Residents in Caddington, Slip End and Pepperstock have sent 34 of the 36 letters received. Of the E-mails received against the development 11 are from residents within the Caddington or Slip End area.
- 6.8 Both the letters and the e-mails have a similar content. There are no form letters. Concerns commonly include the scale of the development and the loss of both village identity and the surrounding green belt. Many of the respondents do not believe the proposed improvements would reduce or offset car use. It is believed by many that the community and social infrastructure of the Bushwood proposal is unaffordable or would never appear. A few respondents state there is no local support for the proposal and that it goes against the emerging Core Strategy. A common belief is that biodiversity and community safety would both suffer. Many respondents state we should develop brownfield sites within the Towns first. The final main concern is that community services and infrastructure are inadequate.
- 6.9 An action committee called CaSE4 was formed to coordinate resistance to the Bushwood proposal. The group distributed postcards that were marked for the attention of the Chairman and Members of the JC. Some 2,083 of these were received in the JTU offices. A statement on the postcard noted the individual’s objection to the proposal. It states the scheme does not fit with the findings of the core strategy and “poses insurmountable transport issues which the developers do not propose to resolve in their published plans”. It states the development would lead to the coalescence of Aley Green, Caddington, Chaul End, Woodside and Slip End with Luton and “create a suburb of Luton with poor transport links”. Finally, it invites members to take account of the evidence the JC has collated which does not support the development. The group is continuing to gather petitions and postcards in order to submit these should the Bushwood development partnership pursue their scheme further.

## **7 FINANCIAL IMPLICATIONS**

- 7.1 There are no direct financial implications as a consequence of the additional public consultation response. Similarly, representations of support or objection to the Bushwood proposal do not have direct financial implications. However, the manner in which public response is used in progressing the LDF could have financial implications for the delivery of the LDF.

## **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.

## **9 EQUALITIES IMPLICATIONS**

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

## **10 APPENDICES**

- 10.1 Appendix A – Luton and South Bedfordshire Core Strategy and Key Diagram: Preferred Options Public Consultation Misplaced Representations; Schedule of Responses, Suggested Joint Committee Response, Reason for Response and any Proposed Action.