## 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

ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4298	Mrs Helen Stone	Leighton Buzzard	Paragraph 2.11	No

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.

JC Response: Not Agree Proposed Action: No action required

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.

4305 Goodman Cambridge Question 2 No

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.

JC Response: Not Agree Proposed Action: No action required

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 delivery additional new employment land including the delivery of strategic employment sites.

4315 Mr D Compton Leighton Buzzard Paragraph 4.16 No

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.

JC Response: Not Agree Proposed Action: No Action

JC Reason for Response: A Sustainable Urban Extension is proposed in Leighton Linslade.

4334 Mr D Compton Leighton Buzzard Paragraph 4.16 No

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.

JC Response: Not Agree Proposed Action: No Action

JC Reason for Response: A Sustainable Urban Extension is proposed in Leighton Linslade.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4348	Mr J Dolan	Luton	Paragraph 4.16	No

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.

JC Response: Not Agree Proposed Action: No Action

JC Reason for Response: A Sustainable Urban Extension is proposed in Leighton Linslade.

4306 Goodman Cambridge Paragraph 4.18 No

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.

JC Response: Not Agree Proposed Action: No Action

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.

4307 Goodman Cambridge Paragraph 4.22 No

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.

JC Response: Not Agree Proposed Action: No Action

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 then small urban extensions

4296 David Adams Leighton Buzzard Paragraph 4.27 No

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 in the narrow gauge railway; the lack of employemnt; and building on the flood plain

JC Response: Not Agree Proposed Action: No Action

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.

4308 Goodman Cambridge Paragraph 4.31 No

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.

JC Response: Agree Proposed Action: No Action

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.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4309	Goodman	Cambridge	Paragraph 4.33	No

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.

JC Response: Partially agree Proposed Action: No Action

JC Reason for Response: Reserve and contingency sites are being identified as part of the Delivery and Implementation for the Core Strategy.

4304 Geraldine Beecroft Leighton Buzzard Question 4 No

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.

JC Response: Statement with which Proposed Action: No Action neither agree nor disagree

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.

4335 Mr D Compton Leighton Buzzard Question 4 No

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.

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 neither agree nor disagree

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.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4316	Mr D Compton	Leighton Buzzard	Question 4	No

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.

JC Response: Statement with which Proposed Action neither agree nor disagree

Proposed Action: Further work to be undertaken to test the proposals and identify measures to mitigate impact

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.

4349 Mr J Dolan Luton Question 4 No

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.

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

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.

4310 Goodman Cambridge Question 4 No

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.

JC Response: Not Agree

Proposed Action: No Action

JC Reason for Response: Preferred Options based on evaluation of evidence that has identified the four identified SUE's as the most sustainable.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4303	Miss Caroline Hamilton	Leighton Buzzard	Question 4	No

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.

JC Response: Statement with which neither agree nor disagree

Proposed Action: No Action

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.

4294 Keep Hitchin Special Not Known

Question 4

No

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.

JC Response: Not Agree

Proposed Action: No Action

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.

Bruce McIntee 4293

Not Known

Question 4

No

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.

JC Response: Not Agree

Proposed Action: No Action

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.

4355 Alison Nash Leighton Buzzard

Question 4

No

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.

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

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.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4323	Dr M Nasir	Caddington	Question 4	No

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.

JC Response: Not Agree

Proposed Action: Further work to be undertaken to test the proposals and identify measures to mitigate impact

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.

4341 Dr M Nasir Caddington Question 4 No

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.

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

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.

4301 Susan Rowe Leighton Buzzard Question 4 No

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.

JC Response: Not Agree

Proposed Action: No Action

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.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4297	Mrs Helen Stone	Leighton Buzzard	Question 4	No

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 Linslade 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.

JC Response: Not Agree

Proposed Action: No Action

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.

4302 Mr Andrew Wingrove

Leighton Buzzard

Question 4

No

Comment: I strongly object to the eastern Leighton Buzzard development.

JC Response: Statement with which neither agree nor disagree

Proposed Action: No Action

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.

4329 Mr S Worts Houghton Regis Question 4 No

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.

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

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

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4319	Mr D Compton	Leighton Buzzard	Paragraph 4.45	

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.

JC Response: Agree Proposed Action: Delivery Plan to be included in the Submission Stage.

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.

## 4338 Mr D Compton Leighton Buzzard Paragraph 4.45

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.

JC Response: Agree Proposed Action: Delivery Plan to be included in the Submission Stage.

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.

4352 Mr J Dolan Luton Paragraph 4.45

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.

JC Response: Agree Proposed Action: Delivery Plan to be included in the Submission Stage.

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.

4344 Dr M Nasir Caddington Paragraph 4.45

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.

JC Response: Agree Proposed Action: Delivery Plan to be included in the Submission Stage.

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.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?		
4326	Dr M Nasir	Caddington	Paragraph 4.45			
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JC Resp	onse: Agree Proposed Action: Delivery Plan to be include	led in the Submission Stage.				
	on for Response: The evidence supporting the Core Strategy will need to demo cture. The Core Strategy will be accompanied by a Delivery Plan at submission					
4330	Mr S Worts	Houghton Regis	Paragraph 4.45			
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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.						
4311	Goodman	Cambridge	Paragraph 5.3	No		
these site	nt: Various potential locations for Park and Ride facilities are identified, however es. Goodman considers that a major development at M1 J12 has the potential to cal Development Framework.					
JC Resp	onse: Not agreed Proposed Action: No action					
JC Reas	on for Response: The locations of the Park and Ride sites are based on existing	g technical evidence. More wo	ork will be undertaken to refine thes	e locations.		
	Mrs Helen Stone	Leighton Buzzard	Question 5	No		
Comment: There are no adequate proposals put forward for Leighton Linslade, with the investment emphasis directed solely to Luton, Houghton Regis and Dunstable. The proposed 2500 dwellings for Leighton Linslade cannot be integrated into the already congested and inadequate road and rail links.						
				ind Dunstable.		
The prop		congested and inadequate real real congested and inadequate real congestions.	oad and rail links. nfrastructure needed to support gro			

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4295	Keep Hitchin Special	Not Known	Question 6	No

Comment: I speak as Chairman of "Keep Hitchin Special". We are concerned about the new bypass from the M1 through to the A505 and the amount of traffic this will generate through Hitchin and onto the A1M also the loss of valuable agricultural land and erosion of the Green Belt. The Park and Ride alongside the A505 is we feel in the wrong location.

JC Response: Not agree

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 its timely delivery

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.

4318 Mr D Compton

Leighton Buzzard

Paragraph 6.3

No

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.

JC Response: Not agree

Proposed Action: No Action

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.

4337 Mr D Compton

Leighton Buzzard

Paragraph 6.3

No

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.

JC Response: Not agree

Proposed Action: No Action

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.

4351 Mr J Dolan

Luton

Paragraph 6.3

Vο

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.

JC Response: Not agree

Proposed Action: No Action

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.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4343	Dr M Nasir	Caddington	Paragraph 6.3	No

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.

JC Response: Not agree Proposed Action: No Action

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.

4325 Dr M Nasir Caddington Paragraph 6.3 No

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.

JC Response: Not agree Proposed Action: No Action

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.

4339 Mr D Compton Leighton Buzzard Question 8 No

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.

JC Response: Not agree Proposed Action: No Action

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.

4320 Mr D Compton Leighton Buzzard Question 8 No

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.

JC Response: Not agree Proposed Action: No Action

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.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4353	Mr J Dolan	Luton	Question 8	No

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.

JC Response: Not agree

Proposed Action: No Action

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.

4327 Dr M Nasir Caddington Question 8 No

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.

JC Response: Not agree

Proposed Action: No Action

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.

4345 Dr M Nasir Caddington Question 8 No

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.

JC Response: Not agree

Proposed Action: No Action

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.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4332	Mr S Worts	Houghton Regis	Question 8	No

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.

JC Response: Not agree Proposed Action: No Action

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.

4336 Mr D Compton Leighton Buzzard Paragraph 6.28 No

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.

JC Response: Not agree Proposed Action: No Action

JC Reason for Response: The Preferred Options are based on an existing technical evidence base. Land to the east of Leighton Linslade has been identified for an urban extension within the Core Strategy. Further technical work will be undertaken to refine these options.

4317 Mr D Compton Leighton Buzzard Paragraph 6.28 No

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.

JC Response: Not agree Proposed Action: No Action

JC Reason for Response: The Preferred Options are based on an existing technical evidence base. Land to the east of Leighton Linslade has been identified for an urban extension within the Core Strategy. Further technical work will be undertaken to refine these options.

4350 Mr J Dolan Luton Paragraph 6.28 No

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.

JC Response: Not agree Proposed Action: No Action

JC Reason for Response: The Preferred Options are based on an existing technical evidence base. Land to the east of Leighton Linslade has been identified for an urban extension within the Core Strategy. Further technical work will be undertaken to refine these options.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4342	Dr M Nasir	Caddington	Paragraph 6.28	No

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.

JC Response: Not agree Proposed Action: No Action

JC Reason for Response: The Preferred Options are based on an existing technical evidence base. Land to the east of Leighton Linslade has been identified for an urban extension within the Core Strategy. Further technical work will be undertaken to refine these options.

4324 Dr M Nasir Caddington Paragraph 6.28 No

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.

JC Response: Not agree Proposed Action: No Action

JC Reason for Response: The Preferred Options are based on an existing technical evidence base. Land to the east of Leighton Linslade has been identified for an urban extension within the Core Strategy. Further technical work will be undertaken to refine these options.

4321 Mr D Compton Leighton Buzzard Question 10 Yes

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.

JC Response: Partially agree Proposed Action: No Action

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.

4340 Mr D Compton Leighton Buzzard Question 10 Yes

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.

JC Response: Partially agree Proposed Action: No Action

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.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4354	Mr J Dolan	Luton	Question 10	Yes

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.

JC Response: Partially agree

Proposed Action: No Action

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.

4328 Dr M Nasir Caddington Question 10 Yes

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.

JC Response: Partially agree

Proposed Action: No Action

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.

4347 Dr M Nasir Caddington Question 10 Yes

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.

JC Response: Partially agree

Proposed Action: No Action

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.

4333 Mr S Worts Houghton Regis Question 10 Yes

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.

JC Response: Partially agree

Proposed Action: No Action

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.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4300	Mrs Helen Stone	Leighton Buzzard	Paragraph 7.7	No

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.

JC Response: Not Agree Proposed Action: No Action

JC Reason for Response: A range of new land uses are proposed in the urban areas to support the additional housing growth proposed.

4312 Goodman Cambridge Paragraph 7.11 No

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.

JC Response: Not Agree Proposed Action: No Action

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.

4313 Goodman Cambridge Question 11 No

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.

JC Response: Not Agree Proposed Action: No Action

JC Reason for Response: The Core Strategy is based on evidence studies to identify the most sustainable locations for employment use.

4314 Goodman Cambridge Question 12 No

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.

JC Response: Not Agree Proposed Action: No Action

JC Reason for Response: The Core Strategy is based on evidencestudies to identify the most sustainable locations for development.

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ID	Name/ Organisation	Post Town	Paragraph/Question	Support?
4322	Mr D Compton	Leighton Buzzard	Question 17	Yes

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.

JC Response: Not Agree Proposed Action: No Action

JC Reason for Response: The Core Strategy is based on evidencestudies to identify the most sustainable locations for development.

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