

Towards a Core Strategy Development Plan Document for the Luton and southern Bedfordshire Area.

Appendix B: Summary of Alternative SSSA Proposal at West of Luton (a.k.a. Bushwood)

1. BACKGROUND

- 1.1 In January 2009 the Joint Technical Unit was made aware of a significant alternative proposal for an Urban Extension on land to the West of Luton. This site roughly coincided with the Area M site tested at the time of the Core Strategy Issues and Options Document published in 2007. Whilst not a preferred option, the promoter of the development submitted a series of documents during the Summer of 2009 supporting their representation that this was a preferable alternative.
- 1.2 Following the Luton and southern Bedfordshire Core Strategy Preferred Options consultation during Spring and Summer of last year, the Joint Committee considered the Report of Consultation at its 23rd October 2009 meeting (Agenda items 5 and 6) and this position was re-affirmed.
- 1.3 Since that time, a considerable number of representations have been submitted both for and against the "Bushwood" proposal as reported elsewhere on this agenda. In the light of the public interest in this potential strategic alternative, it is appropriate that the Joint Committee be given an opportunity to consider these submissions.

2. THE SUBMISSIONS MADE BY THE DEVELOPER.

- 2.1 The main submissions made by the developer consist of the following documents:
 - A. The Case for Bushwood (Luton West)
 - B. Analysis and Representations on the L&SB Core Strategy Preferred Options
 - C. Bushwood Master Plan: A Vision for Luton and Dunstable
 - D. Bushwood (Luton West) Landscape Assessment
 - E. Bushwood (Luton West) Transport Strategy
 - F. Luton West Model Results Summary (supplemental to document E.)
 - G. Bushwood Luton West: Phase 1 Ecology Report.
 - H. Heritage Assessment Summary Report
 - I. Bushwood (Luton West) Drainage and Utilities Strategy
 - J. Sports Facilities in Bushwood (Luton West)
 - K. Assessment of Potential Locations for Luton Town Football Club Community Stadium
 - L. Assessment of Noise Impacts
 - M. A Financial Appraisal Draft nr 2 dated October 2009 and marked Private and Confidential

- 2.2 All these documents will be available at the meeting except for document M.
- 2.3 **A. The Case for Bushwood (Luton West).** The consultant sets out the purpose of this document as explaining why the proposal is an appropriate location for delivering a significant proportion of the development required and is the most appropriate of all the alternatives. It sets out how it complies with the MKSM sub-regional strategy, sets out the objectives of their scheme, examines the evidence supplied by themselves, introduces the Bushwood Master Plan, compares it with the alternatives and offers a conclusion.
- 2.4 That conclusion is presented here in full as it is a clear précis of the document and indeed of the proposal as a whole.

“The Bushwood proposals represent a highly sustainable urban extension that warrants full and proper consideration as part of the preparation of the Core Strategy. It is important to acknowledge that the Luton West site brings with it, inherent advantages over Area M, identified by the JTU at the Issues and Options stage. Notwithstanding this, an important part of the JTU’s evidence, in the form of the Halcrow Employment Land review, identified Area M as one of the three appropriate locations for strategic employment provision. Luton West also has clear advantages over the other preferred locations for growth (especially Luton North and Luton East).”

“The sustainability credentials of the proposals are underpinned by the integration with the increased patronage of the Luton Dunstable Guided Busway to achieve deliverable sustainable public transport provision.

“The other unique attribute of the Luton West location is its close proximity to key attractors such as Luton Town Centre, parkway Station and London Luton Airport. The close proximity of the site means that for trips to the Town Centre cycling and walking are real alternatives to the use of the private car.

“Overall, the Bushwood proposals represent a viable and deliverable urban extension, the inclusion of which within the Core Strategy will ensure its soundness.”

- 2.5 **B. Analysis and Representations on the L&SB Core Strategy Preferred Options.** The conclusion by the consultant is that the evidence base for the preferred options does not support the proposals made. It does not provide evidence of deliverability and the availability of resources to pay for key items of infrastructure. It has an inadequate Sustainability Appraisal and proposes unsustainable growth locations. It does not address the public expression for a minimal loss of the green belt.
- 2.6 The document goes on to say that the Core Strategy proposes development outside of the Plan area and that there has been an inadequate testing of the alternatives.
- 2.7 **C. Bushwood Master Plan: A Vision for Luton and Dunstable.** This document sets out the key elements of the proposed development. It provides for 5,500 dwellings, 35% affordable home, specialist residential accommodation for the elderly, employment land to provide 4800 jobs, a new community stadium and community play and sports facilities of various kinds. It will provide a 30 acre site for Luton Town Rugby Club. It will also provide a new route for buses via an existing tunnel under the M1 and new walking and cycle routes including a new bridge over the M1. The

internal neighbourhoods will have their own local centre and primary school. There will be an extensive network of open spaces which will separate the existing settlements from the new development.

- 2.8 **D. Bushwood (Luton West) Landscape Assessment.** A landscape assessment was prepared by a Landscape Architect. It is concluded that the proposal lies outside of the Chilterns AONB and would not give rise to significant effects on the AONB. They would concur with a previous South Bedfordshire District Landscape Character Assessment that the area is of moderate visual and landscape sensitivity. This contradicts the Bedfordshire County Council's assessment which shows a significant part of the site as highly sensitive to new development.
- 2.9 **E. Bushwood (Luton West) Transport Strategy.** The consultant provides a detailed report and states that Bushwood can be compared fairly with the other potential development sites only if its accessibility is tested on the properly designed public transport package which is proposed. This approach targets three areas, within Bushwood itself, within the Luton and Dunstable area and across the wider region. The common factor is the extent to which the intention is to focus efforts on making car use unattractive and to offer improved bus services, bus services linking up with the busway, cycling routes, car sharing, pedestrian routes and other innovative measures.
- 2.10 **F. Model Results Summary (supplemental to document E.)** This additional report concerns a "run" of a transport model to show the impact of the development on local roads. The consultant concludes that:
- "The results confirm that whilst there would be increases in flows and delays there would not be widespread congestion and that measures to mitigate the problems would be confined to junction improvements on the surrounding network. There would be additional traffic through the neighbouring villages of Caddington and Slip End, however the relative increase is not unmanageable and measures to reduce and divert through movements can be expected to have an ameliorating effect. Finally, when assessed on a like-for-like basis there are no clear benefits for the East [sic. the original East of Luton proposal now deleted] and in almost all the key measures the West produces more sustainable results."*
- 2.11 **G. Luton West: Phase 1 Ecology Report.** This document provides a detailed technical assessment of ecological interests in the area and provides a useful description of the main habitats and areas of ecological interest. It is noted that careful design and layout will be required to limit the land take of the proposed stadium and the park and ride facility in the north. An approach to mitigation is offered as a result.
- 2.12 **H. Heritage Assessment Summary Report.** This is a desk based assessment of the heritage resources on the site. There are no Scheduled Ancient Monuments or other designated archaeological sites on or near the site. Some areas will require further field archaeology and potential management plans once assessed.
- 2.13 **I. Bushwood (Luton West) Drainage and Utilities Strategy.** This is a technical assessment of flood risk, drainage, electricity, telecoms, water supply and gas supply utilities necessary to support the development. It concludes that's the site is not at risk of fluvial flooding but that surface water run-off will require land to be set aside along the M1 for this purpose. A new sewer connection of about 3.5 km would be required

from the site to the East Hyde STW. Existing high voltage overhead electricity cables can be diverted underground.

- 2.14 **J. Sports Facilities in Bushwood (Luton West).** This document sets out the provision of sports facilities to meet the needs of the new residents of Bushwood, address the lack of facilities in the existing villages, offer a wider than local range of facilities cost effectively and provide specialist facilities for individual sports. The recommended list of facilities includes; a 6 court sports hall, 6 lane swimming pool, health and fitness centre, 4 community halls, 32 – 36 hectares of sports pitches a community stadium (possibly for Luton Town Football Club) and a site for the relocation of the Luton Rugby Club.
- 2.15 **K. Assessment of Potential Locations for Luton Town Football Club Community Stadium.** This report assesses a number of known potential locations for a relocation of the Football Club and compares them to the proposals included within the Bushwood development. One of the options compared is the site presently allocated for such a use in the Luton Borough Local Plan (Policy SA1) at Stockwood Park. The report concludes that the site identified in the Bushwood Master Plan performs better on the grounds that it is closer to the Kenilworth ground, has better public transport potential and is easier for pedestrians to access. It is also not subject to other land use alternatives. On the other hand, the site identified in the Bushwood Master Plan has a greater impact on the Green Belt and a wildlife designation.
- 2.16 **L. Assessment of Noise Impacts.** This is a technical assessment which concludes that the site is subject to noise from approaches to London Luton Airport and from noise from the M1 motorway. It is concluded that with careful location of the residential area, the noise from the airport is not a constraint to development. It is suggested that noise bunds can be constructed along the M1 to mitigate localised noise.
- 2.17 **M. Financial Appraisal.** A financial appraisal can only be a snapshot in time and great care has to be taken when, as in this case, it is prepared as an initial appraisal rather than a full financial viability statement. This appraisal concludes that after taking into account the likely cost of the package of affordable housing, community facilities, stadium, leisure pool, sports village, country park and schools as well as the cost of the necessary infrastructure, then the scheme is financially viable.
- 2.18 (Note of HoJTU: The appraisal does not include a sum for other costs that may be incurred such as any commuted sum for the running of the stadium, any special engineering works or a land budget for noise attenuation measures, land acquisition costs for land outside of the client's control, any as yet unforeseen utility costs, support for bus services or any substantial off-site road infrastructure improvements that may be required. The appraisal is also highly sensitive to changes in construction costs and the price of the houses.)

3. COMMENTS

- 3.1 Understandably, the Bushwood proposals were prepared prior to the changes brought about by the Coalition Government in recent weeks and could not have taken the changes into account. For the reasons set out in the main report, the revocation of the Regional Spatial Strategy means that less housing is proposed. Together with the reduction in the plan period, this results in substantial drop (over ten thousand houses) in the requirement.

- 3.2 Therefore it is recommended that the East of Luton housing recommendation (cited though not exclusively as a comparator to the Bushwood proposal) be removed from the Core Strategy. Of the remaining urban extensions, the Core Strategy looks to the Houghton Regis (North) allocation as an appropriate location, not least due to its ability to assist in the delivery of a core element of the Strategy; the A5 – M1 link. It looks to Luton North as an important location, albeit in the longer term for the delivery of housing and employment that can take advantage of the new J11a to the motorway. It looks to the proposal to the east of London Luton Airport to deliver strategic employment resources that can be directly linked to the M1 and Luton itself. It looks to Leighton – Linslade as an area that can deliver required housing in the early years of the plan.
- 3.3 It is therefore considered that in the short to medium term, there is no requirement to allocate a further urban extension or replace others with this proposal. Thus it is not supported as a preferred option.
- 3.4 It is of course open to the developer to challenge this view in the normal manner through representations to the Secretary of State prior to the Plan being submitted for approval. The merits of the alternatives can be discussed at the subsequent Examination before an independent Inspector. It is also open to any proposer of development to submit a planning application in the normal manner.