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6<sup>th</sup> May 2011

Dear Mr Vickery,

1. I refer to your letter of 15<sup>th</sup> April 2011 advising of the Exploratory Meeting to be held on 18<sup>th</sup> May. On behalf of the Joint Technical Unit, I thank you for the opportunity to respond to the significant concerns that you have identified relating to the soundness of the Luton and southern Central Bedfordshire Core Strategy.
2. As you have appreciated during the course of our previous correspondence<sup>1</sup> my authority to respond derives from a delegated authority given to me by the Luton and South Bedfordshire Joint Committee<sup>2</sup> and not from its constituent Councils. That delegated authority allows me to make only “minor changes” to the Core Strategy. It would be fair to say that most actions necessary to address your concerns would go further than that. However, you have helpfully stated in your letter that:  
  
*“It may be that some particular decisions of principle will have to wait until after the EM so that the two Councils’ Joint Committee can decide them.”*
3. Therefore I will highlight those matters where I will require a decision of the Joint Committee before I may confirm the necessary actions. It would in consequence be helpful if during the EM itself you were able to outline the subsequent procedure that would be followed for receiving the views of the Joint Committee, as reappointed, and for taking them into account when making your decision.
4. The remaining part of this letter addresses the concerns set out in Annexe 1 of your letter in the order given.

### Introduction

5. It is my view, based on the detailed response I set out in the remainder of this letter, that there will be a need to defer the start of the Hearings to enable the Joint Committee to suggest alterations to the Core Strategy. There will also be a

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<sup>1</sup> Letters and documents 1 – 17: <http://www.shapeyourfuture.org.uk/ExploratoryMeeting.html>

<sup>2</sup> A S.29 body under The Luton and South Bedfordshire Joint Committee Order 2007

need, in some part due to the delay caused by a deferral, to amend and update parts of the evidence base.

6. It is my estimate<sup>3</sup> that it will require a deferral of between three to six months to undertake these alterations and updates depending upon the decisions taken by the Joint Committee on key items of concern.
7. A meeting of the Joint Committee will be arranged as soon as possible after this EM. The calendar of meetings for the JC are as follows:

24 June (Dunstable)  
29 July (Luton)  
4 November (Dunstable)  
2 December (Luton)  
3 February 2012 (Dunstable)  
30 March (Luton) (last meeting of the L&SB Joint Committee)

8. It will be my intention to present the note of the EM as produced together with my recommendations to the earliest practical meeting of the Joint Committee. This will include a recommendation to alter the delegated authority arrangements to deal with a broad range of potential changes to speed up the process of decision making in the future.
9. In preparing the Core Strategy, the Joint Technical Unit has addressed directly the guidance set out in paragraph 4.1 of Planning Policy Statement 12 which states:

*“Every local planning authority should produce a core strategy which includes:*

*(1) an overall vision which sets out how the area and the places within it should develop;*

*(2) strategic objectives for the area focussing on the key issues to be addressed;*

*(3) a delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram; and*

*(4) clear arrangements for managing and monitoring the delivery of the strategy.*

10. It is within this context that the key questions that follow are considered.

### **Is the CS legally in ‘general conformity’ with the Regional Strategy?**

11. The current Regional Strategy for the Luton and South Bedfordshire Joint Committee area is the East of England Plan 2001 - 2021, published in May 2008 (BD8). This Plan is complemented by the earlier Milton Keynes South Midlands Sub-regional Strategy 2005 (BD7) from which the East of England Plan draws policies relevant to this area.

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<sup>3</sup> See Appendix A for details

12. The Luton and south Central Bedfordshire Core Strategy was agreed by the Joint Committee and then published as a pre-submission document in November 2010. At the time, the Regional Strategy had been revoked by a letter from the Chief Planner at the Communities and Local Government office to all Authorities on 6<sup>th</sup> July 2010. The regional planning support framework was subsequently dismantled and the remaining regional planning staff at the East of England Regional Assembly and the Government Office for the East of England left on 31<sup>st</sup> March this year.
13. By the time the Core Strategy was submitted on 8th March 2011, a series of legal challenges to this decision resulted in the Secretary of State conceding that the Regional Strategies remained in place. Therefore as the legal position presently stands, the Core Strategy must be “in general conformity” with the Regional Strategy by reason of Section 24(1) of the Planning and Compulsory Purchase Act 2004.
14. It is the generally settled opinion that the Government have made their intentions clear: Regional Strategies will be revoked through the enactment of the Localism Bill, currently making its way through Parliament, and through compliance with the relevant procedures. In a more recent development, the Government have made it plain also that it expects local planning authorities to progress their plan-making swiftly in the interests of returning the Country to economic growth.<sup>4</sup>
15. This has placed all the participants in the process of plan-making on the horns of a dilemma: speed versus adapting to changing Government policy.
16. All regional planning work on the replacement to the East of England Plan ceased in April 2010. However, I consider that it would be helpful to the Exploratory Meeting if a view is expressed by the former Head of Planning for the former East of England Assembly<sup>5</sup> on where this leaves the Core Strategy in its relationship with the Regional Strategy. This letter is attached and provides useful context for the remainder of my letter.
17. The Core Strategy had its origins in a Regional Strategy that was written in better economic times and that is now out of date in terms of its assumptions about future public investment in infrastructure. The Core Strategy has had to adapt quickly to a situation where no regional planning process currently exists which would have allowed the Regional Strategy itself to be adapted to difficult public investment circumstances.
18. The Joint Committee therefore authorised such an “adaptation” by reducing the time period for which the Core Strategy plans and by limiting its ambitions for growth during the Summer of 2010.
19. Therefore, whilst I agree that the Core Strategy as written does not correctly reflect the legal position of the Regional Strategy as we find it today, it could not have done so as it was written at a time after support for regional planning was withdrawn but before the Regional Strategy as a legal document was “re-instated.”

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<sup>4</sup> Appendix B - Letter from the Chief Planner; “Planning for Growth” CLG 31<sup>st</sup> March 2011

<sup>5</sup> Appendix C – Letter from Adrian Cannard, Head of Planning EERA 2006 – 2010.

20. Today in those circumstances, the current options are:
- To withdraw the Core Strategy.
  - To defer its consideration until the Localism Bill is enacted and the revocation of the RS through required procedures are completed.
  - To explain how much “in general conformity” with the RS the Plan actually is in any case.
  - To argue that the Regional Strategy is out of date in its policy context and content. However, if the process of approving the Core Strategy in this manner takes a substantial amount of time, option 2 will occur by default.
21. The Joint Committee has not had an opportunity to consider the content of the Core Strategy in the light of the current legal position of the Regional Strategy. Any alteration to the document will therefore require a decision from the Joint Committee on how it wishes to proceed.
22. Turning to your specific concerns, there is no definition of what “in general conformity” means since the original definition was withdrawn from use.<sup>6</sup> However it is not unreasonable to consider that the Core Strategy is in general conformity with the Regional Strategy unless there are significant inconsistencies between them. You have referred to three issues where, if there were significant inconsistencies, I would agree that the matter of “general conformity” may be so determined: housing numbers, employment provision and timeframe.

#### Housing Numbers

23. This letter is accompanied by Background Paper No. 1 – Housing Numbers, which explains the reasoning behind the numbers included within the Core Strategy.
24. In summary, the evidence for the local growth/need calculations is from the locally produced forecasts. The justification is that it is a more cautious but nevertheless realistic approach to providing for growth, at a time when rapid changes in government policy requires caution. However, the Core Strategy allows for a step change in housing to be provided should better economic times emerge over the next 15 years and if commensurate public and private investment increases.

#### Employment Provision

25. Background Paper No. 2 – Employment explains the reasoning behind the decisions made on employment land provision.
26. The revised calculation for employment land provision is based upon a particular method of balancing housing growth with jobs and then translating that into the necessary land allocations. The principal source is the evidence document EC2.

#### Timeframe: Regional Strategy v Core Strategy.

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<sup>6</sup> Contained within the superseded Planning Policy Statement 12; 2004; CLG.

27. The origins of a re-consideration of the timeframe for the Core Strategy being reduced from 20 to 15 years lies in the peer review undertaken by Mr. Roy Foster of the Planning Inspectorate in a note following two advisory visits in January 2009.<sup>7</sup> In commenting on the difficulties that the Core Strategy may face if it were to prove that the then promoted East of Luton urban extension could not come forward, then it was suggested that a 15 year timeframe could be explored.
28. In November 2009, support for the East of Luton urban extension was withdrawn by Luton Borough Council. The Joint Committee took this into account when considering the content of the Pre-Submission version of the Core Strategy published in November 2010. The East of Luton urban extension as originally proposed was withdrawn.
29. However, two additional factors were emerging prior to publication of the Core Strategy: the extent to which the Core Strategy was predicated upon substantial infrastructure and the funding that was likely to be available. In the Regional context, both are explained within the letter previously referred to and included in Appendix C.
30. The Joint Technical Unit assisted the then Local Delivery Vehicle (Luton Gateway) in producing a Study of the infrastructure that would be associated with the growth proposals of the Core Strategy (GEN 1.1 & 1.2). This set out the scale of the strategic infrastructure that would be associated with the growth and did so using a “worst case” approach that would underscore the scale of the funding sourcing that was going to be required.
31. This was, in part, the testing process required by the Regional Strategy to consider the scale of growth that could be achieved in the period 2021 to 2031. Mr Cannard’s letter makes it clear that if the review of the Regional Strategy had continued beyond April 2010, it would have made this even plainer. Indeed Mr Cannard goes further and explains how Government Policy towards the funding of infrastructure and the ambitions of the Regional Strategy were and still are closely interlinked.
32. The Joint Committee decided during the Summer of 2010 that a reduction in the time period of the plan from 20 years to 15 years would be a realistic compromise between the uncertainty of the funding of infrastructure from both public and private sources and the need to provide reasonable certainty about delivering housing for the 15 year period also expected by Government Planning Policy.<sup>8</sup>

### **Are the Proposals Map changes and Key Diagram clear and legal?**

33. The JTU’s understanding of the Inspectorate’s advice is the same as that expressed by yourself. The JTU is currently seeking its own legal advice in the light of Mr. Peter Village’s Legal Opinion. This will be available for the Exploratory Meeting. In the meantime, the opinion of the JTU is included within Background Paper 3: The Proposals Map and Key Diagram.

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<sup>7</sup> Appendix D - PINS Advisory Visit – Note following visits 13 & 19 January 2009

<sup>8</sup> Planning Policy Statement 3 – Housing 2010; paragraphs 34 & 53

34. In respect of your practical concerns, I agree that there are a number of explanations and some amendments to the Key Diagram and the Proposal Map Amendments that would aid clarity. These are set out in Background Paper 3 – The Proposal Map and Key Diagram. Any further alterations necessary in the light of the discussions at the Exploratory Meeting and subsequent decisions by the Joint Committee, will also be made.

### **Consultation procedures – legal compliance**

35. I note the Legal Opinion of Mr. Peter Village about the legality of the consultation procedures. Mr. Village does not mention the impact that the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 had on consultation procedures. Essentially this changed the process to the extent that relevant parts of the December 2007 SCI upon which which Mr. Village relies became redundant.
36. I have sought Counsel Opinion on the impact that those changes have had and the degree to which the Joint Committee have conducted consultations in a manner which allowed representations on alternative sites to be made. This will be available for the Exploratory Meeting. In the meantime, the opinion of the JCU is included within Background Paper 4: The Statement of Community Involvement.
37. The manner in which consultations have been conducted is set out in the submission documents (JCS3). The opportunities for engagement by Mr Village's clients and others were continuous throughout the period from 2007 to 2011. These included specific consultations from June to October 2007; from April to June 2009 and from November to January 2010/11. Representations have been made by many for alternative sites. I am unaware of any further alternative sites being put forward. I am of the view that no party was prejudiced by the process followed.
38. I disagree that there is a need for a specific consultation on alternative sites. Nevertheless, should the Joint Committee consider that further consultation is required for other reasons associated with the need for substantial changes to the Core Strategy, then this would provide the opportunity for further representations to be made and thus deal with Mr. Village's point.

### **Is the CS effective?**

39. I consider that the Vision and Strategic Objectives are sufficiently clear from which to derive appropriate policies. However a critical analysis of a more detailed kind than included within the self assessment conducted using the PAS Toolkit (JCS8) has been undertaken. This is Background Paper 5 – Addendum to PAS Self Assessment.

### Vision and Strategic Objectives

40. The Vision is derived directly from the two Sustainable Community Strategies of its constituent Councils and is referenced as such within the Vision section of the Core Strategy. The vision refers to specific geographical areas within the Luton and south Central Bedfordshire area and recognises the importance of the Luton and Dunstable conurbation.

41. The Strategic Objectives flow directly from this Vision. In their degree of precision and in their content, they clearly direct the shape of the policies to come.
42. However, there is other material throughout the Core Strategy that can be cross-referenced with the Strategic Objectives; including those which show how the key issues and trends result in rather than justify these Objectives. If a re-ordering of the information within the Core Strategy document would assist in the understanding of those relationships, this can be undertaken.

#### Policy effectiveness

43. Background Paper 5 draws from an internal audit conducted in the light of your comments which takes each policy in turn and assesses the degree to which the “what, where, when and how” questions are answered. In respect of your specific examples, the following paragraphs are drawn from the assessment.

#### Critical questions

44. I agree that the position of **Sundon Quarry** within the Core Strategy could be made clearer. The justification for identifying the area either as broad strategic location or as a specific allocation within the Core Strategy is the unique location and combination of circumstances which suggest that a Rail Freight Interchange is an opportunity not to be missed. The reason for the uncertain language within the Core Strategy has been that it is not been definite that the promoter of the site is ready to commit to its implementation in the light of other RFI proposals in the surrounding regions or to the necessary infrastructure to allow the RFI to operate effectively.
45. I have re-examined the representation to the Pre-Submission Core Strategy made by the promoter of Sundon Quarry and I consider that there is sufficient support by them to consider Sundon Quarry as a new strategic allocation specific to its potential use as an RFI. Certain questions remain to be resolved such as the fact that it will be dependent upon the new Junction 11a and a new access from the M1 to Sundon Road. These can be explored with the promoter further.
46. This potential change to the Core Strategy will require a decision from the Joint Committee. Should the allocation (and the necessary Green Belt alterations that may be required) be agreed as a way forward, there will be a requirement to amend the Core Strategy document accordingly, update the Sustainability Appraisal and conduct further consultations. The potential timetable is included in Appendix A.
47. The development to the **North of Luton** has been associated from the beginning with the achievement of the strategic east-west transport route that would link the A5 north of Dunstable via the M1, the M1 to the A6 and eventually from the A6 to the A505. However it is known that the cost of the section between the M1 and the A505 would far exceed any reasonable contribution from the private sector and would be reliant upon significant public investment. Therefore the question that the Core Strategy seeks to answer is; what is the minimum requirement for strategic road infrastructure that is required to allow the North Luton

development to proceed with the minimum of disruption to the existing traffic conditions in the area.

48. It is, ultimately, a question of timing. The Core Strategy is constructed to allocate the land to provide long term certainty of the direction of growth. But at the same time it seeks to place the commencement of the development towards the middle of the plan period to offer the best possible opportunity for that necessary infrastructure to be committed in place at the appropriate time.
49. Later in responding to your concerns over the highway evidence it will be shown that strategic road infrastructure has been at the centre of decision making about the content of the Core Strategy.
50. It is considered that an allocation to the North of Luton provides reasonable certainty to the development industry and local interests in the medium term. If it is considered that there is no pressing need to allocate the site at this stage, in the light of the Core Strategy's intention that it will not deliver dwellings until 2019, then it will be necessary to lay the alternative "broad location" option and its consequences and risks before the Joint Committee for consideration. This would be a decision for the Joint Committee to make. I would in these circumstances agree that a future Area Action Plan would be an appropriate DPD mechanism. There would remain a need to consider the relationship between this site and Sundon Quarry in respect of delivering the necessary access from the M1 to the A6 and this will require further discussion with all relevant parties.
51. In respect of the **Luton Town Football Club Stadium**, whilst this is a matter of significant interest within Luton and surrounding area, other strategic elements of the Core Strategy are not dependent upon its implementation. In my view the retention of the saved policy is sufficient and the Core Strategy does not need to include it within Policy CS7. However, there are a number of representations, including that of Luton Borough Council itself, that would wish an alternative location to be explored. The only alternative promoted within the Plan is that made by the promoter of the alternative urban extension to the West of Luton. Therefore the inclusion of the LTFC Stadium within the Core Strategy as a strategic allocation, broad location or not at all will be a matter for the Joint Committee to decide.
52. In respect of the **strategic allocation policies** within the Core Strategy, Background Paper 5: Addendum to the PAS Self-Assessment includes tables for each of the Strategic Site Specific Allocations to show in summary the information available either from within the evidence base or from work that has been undertaken with the principal landowners/developers of each SSSA. From this a list of potential changes to the Core Strategy has been suggested should it be concluded that more detail is necessary.
53. From this work, three conclusions can be drawn. In respect of the East of Leighton Linlade SSSA a draft Master Plan to a significantly complete extent already exists. If agreed by the Joint Committee, it can be used for the purposes of providing the details for the Core Strategy.
54. In respect of the North of Houghton Regis SSSA, significant progress on preparing a Framework Plan has been made and much of the information on



strategic infrastructure, main land uses, viability and social and community requirements already exists within the evidence base. It is also known that the relevant landowners/developers are advanced in knowledge about the constraints and opportunities of their sites. It would be possible therefore to provide the detail indicated within a reasonable time period.

55. In respect of the North Luton SSSA, again much information is contained within the evidence base and can be drawn into the Core Strategy more explicitly. However, there has been less discussion with the landowners/developers of the site than at other SSSAs and no jointly agreed Framework or Master Plan is in progress that would deliver the level of detail suggested. Nevertheless, it would be possible to engage further with the main landowners/developers of the site to provide the detail indicated within a reasonable time period.
56. However, if this site is altered to be a broad location of growth rather than an allocation, then it can be expected that the amount of information that can be obtained from that source will be less than ideal. As indicated elsewhere, a decision on whether the site is promoted as an allocation or a broad location of growth will need to be made by the Joint Committee.
57. In respect of the town centre policies CS19 and CS21, Background Paper 5 suggests that a review of these policies is undertaken.

#### Delivery and implementation effectiveness

58. The statutory basis for the Joint Committee does not allow it to compile a Local Development Scheme beyond its end point of 31<sup>st</sup> March 2012. However, there is no reason why separate LDSs could not be prepared by each of the constituent Councils. Therefore a schedule of proposed development plan documents has been prepared and is included in Appendix E. This can be discussed with, and then presented to, both Councils in due course.
59. I have noted your doubts about the delivery of policies by Luton Borough Council in the light of its representations to the Core Strategy. I have referred the matter to that Authority but I do not expect a response before the Exploratory Meeting. Any response will be relayed to you when received.
60. In response to your similar concern about the employment area at East of London Luton Airport, part of which includes land in North Hertfordshire, Background Paper 11: Delivery of an Improved East of London Luton Airport has been attached.
61. In summary, whilst North Hertfordshire were not part of the Joint Committee arrangements, they have nevertheless maintained contacts with the Joint Committee (attending both the Joint Committee itself and the Members Steering Group meeting) and are fully aware of the recommendations being made. The delineation of the boundary of the East of London Luton Airport employment area as an extension to the Century Park proposals was constructed with the close co-operation of officers from both North Hertfordshire and the Joint Technical Unit.
62. North Hertfordshire District Council's Local Development Scheme 2011 refers to this area as a potential allocation within their Land Allocations DPD. Whilst it is

generally settled opinion that North Hertfordshire is antipathetic to development within this area, it is a matter that will require testing within one Core Strategy or another as a direct result of Policy 2(a) of the MKSMSRS. I consider that the best method for delivering this potential allocation is to test its appropriateness within this Core Strategy which will then, if you consider that the case has been made, trigger its allocation as North Hertfordshire District Council suggests within its own LDS.

63. If this is not possible, it will be necessary for the Joint Committee to consider changes to the Core Strategy that will allow the recommendation to be dropped. It will then fall to Luton Borough Council to pursue the matter through its own representations to the North Hertfordshire Core Strategy. It can reasonably be expected however that this pursuit will be in a context where the Regional Strategy that promoted the area as an area of search will have been revoked.
64. In respect of the details of the East of London Luton Airport recommendation, the Key Diagram can be amended to make it clear that it is advisory only. The accompanying detailed Map is clearly labelled as a recommendation to North Hertfordshire District Council and not as an amendment to the Proposals Map. However, if this proves to be a cause for confusion, the Map can be re-located to an Appendix within the Core Strategy and the indication on the Key Diagram removed. Background Paper 11 includes further information about the access arrangements and discussions with the potential developer.
65. Background Paper 6 – Contingency Planning includes detailed information drawn from the evidence of the critical<sup>9</sup> infrastructure that will be required. It includes an assessment of what would happen if the individual projects were cancelled or delayed.
66. For many of the critical infrastructure projects, there is no alternative. It is a fundamental principle of the Core Strategy that if the critical infrastructure is not provided, the growth cannot be accommodated in the manner envisaged. In my view, the changes necessary to accommodate the loss or significant delay to many of the critical infrastructure projects would be a substantially different Core Strategy. As Mr Cannard states in his letter, in the context of the work that was suspended on the replacement East of England Regional Strategy:  
  
*“It follows that issues of non-delivery of the above [in the letter] strategic infrastructure would have triggered a re-examination of the allocations.”*
67. In respect of the strategic allocations these are substantial in size and it is not possible to provide “contingency sites” in the same manner as might be possible for much smaller allocations without substantially changing, both metaphorically and on the ground, the direction of the Core Strategy. The Core Strategy therefore provides a set of possible contingency scenarios instead within the Contingency Plan section.

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<sup>9</sup> The Core Strategy defines the meaning of “critical” or “essential” rather than “vital” infrastructure. The meaning of “vital” will need to be defined if it is to be used as an alternative category.

## **Whether the CS justifies the proposed development and proposals**

68. The evidence submitted with the Core Strategy includes details of the physical, social and green infrastructure needed. The principal sources of information can be found in numerous documents.<sup>10</sup>

### Green Belt

69. Background Paper 7: Green Belt provides a detailed explanation of how sufficient land has been safeguarded to meet longer term development needs.

### Strategic Flood Risk Assessment

70. The Level 2 Assessment of Strategic Flood Risk has not been completed. Background Paper 8 includes an assessment of the need for and programme for its completion. The conclusion is that a Level 2 SFRA is not required on the basis that it is considered more appropriate to integrate the output of such highly detailed information within the subsequent master planning process.

### Housing Trajectory

71. The Housing Trajectory will be included within a new Appendix to the Core Strategy. The 2010/11 monitoring figures will be available by September 2011.

### Housing numbers,

72. The update to the SHLAA has been commenced and it is anticipated that this will not be completed until September. Further explanation of the derivation of the housing numbers is included in Background Paper 1a.

### Highway evidence

73. Background Paper 9 – The Strategic Transport Infrastructure provides details of each of the strategic highways projects and presages the work to be submitted on transport modelling. Further information can be found in Background Paper 3: Proposals Map and Key Diagram. I consider that the bypass routes are reasonably firm. I consider that the level of detail shown in the Proposals Map Amendments is sufficient to show their strategic importance. Nevertheless, there is sufficient information about these bypasses and junctions to include them within the Proposals Map Amendments if necessary.

### Infrastructure

74. The evidence provided does include detailed information on the provision of infrastructure associated with the Core Strategy over the whole of the 15 year period of the plan. It breaks down the information by growth location, phasing, cost and timescale. It is based on a sophisticated Infrastructure Model which can be interrogated in many ways and can produce tables of information in any manner that is considered appropriate. An example of what can be done is

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<sup>10</sup> See in particular ENV4, ENV5, GEN1.1, GEN1.2, GEN3, GEN6, GEN7, GEN8

included in Background Paper 10 – Delivering and Funding the Core Strategy in the form of a potential replacement to Table 4.1 of the Core Strategy. I would welcome a discussion at the Exploratory meeting on what are the reasonable expectations for the layout of the information within the Core Strategy document itself.

75. Table 4.1, the Infrastructure Schedule, included within the Core Strategy is a simplified version of the information contained within the Infrastructure Delivery Plan & Funding Study (IDP&FS: GEN1.1/1.2). It contains information about the first five years of the Core Strategy as recommended by the Planning Inspectorate.<sup>11</sup>
76. The Funding Gap identified by the Core Strategy on page 53 for the first five years is stated in the text to be £28 Million taking into account the estimated developer contributions that could reasonably be collected. For details of how funding for this could be found lies in Chapter 11 of the IDP&FS. However, I consider that the question of how a funding gap can be filled, even if the amount can be pinned down for more than a short period of time, cannot be answered in a period of economic uncertainty and public finance constraints. What underpins the Core Strategy is an Infrastructure Model that can be kept up to date and provide a method for tracking the gap and assisting in the search for specific solutions to individual barriers to growth.
77. Nevertheless, Background Paper 10 includes details of a number of initiatives towards dealing with the funding requirements of specific infrastructure projects and specific growth locations as far as is known at this time.
78. The IDP&FS was itself part of a continuous approach towards updating previous viability studies. That approach also included discussions with landowners and developers and internal assessments. But this will always, by necessity, be a work in progress and will require continuous updating throughout the period of the Core Strategy. It is possible to provide a more up to date assessment of the viability of the strategic site allocations but that in turn will date very quickly depending upon the rate of improvement in the economy, the financial position of each potential developer, changes in costs and the current funding position of the public sector. If another snapshot of this position via an updated Viability Assessment for the Core Strategy as a whole is considered to be essential, it will be necessary to defer the Hearing for this to be produced. This will be a decision for the Joint Committee.

### **The CS's monitoring arrangements**

79. Appendix F sets out a proposal for the construction of a more comprehensive Monitoring Section of the Core Strategy.

### **Missing policy**

80. Appendix G sets out the options for a proposed Gypsy and Traveller Policy or approach. The JTU would welcome views from participants in the EM.

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<sup>11</sup> See paragraphs 22 - 26 and associated inset box within [http://www.planningportal.gov.uk/uploads/pins/ldf\\_learning\\_experience\\_sept2009.pdf](http://www.planningportal.gov.uk/uploads/pins/ldf_learning_experience_sept2009.pdf)

## **Future Examination of the CS**

81. The Joint Technical Unit notes that there are other, as yet un-named, issues.

Yours sincerely,

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