

## **Draft Development Strategy and the proposed urban extension north of Luton**

1. This note addresses issues related to the proposed urban extension to the north of Luton contained in the Development Strategy, including issues related to the new road infrastructure proposed. The note responds to issues raised by Cllr Nicols in his email of 15/10/12.

### **Overall requirement for new development**

2. One of the underlying concerns expressed is that the overall level of housing provision is too low and that any necessary increase might be imposed on a particular area by a Planning Inspector without proper scrutiny or consultation. The level of housing proposed in the Development Strategy will be one of the key issues discussed at the forthcoming Public Examination. However, the notion that an inspector could unilaterally impose a new housing target and new sites to meet this target is incorrect.
3. The level of new housing currently proposed is lower than that set out in a combination of the withdrawn Joint Core Strategy and adopted LDF documents for the north – annual provision of 1,438 homes as opposed to 1,810 homes previously. This compares with net completions in 2011/12 of 1,310 new homes. The recent emphasis from Government on local evidence to underpin housing targets is among the key factors that support a change to the previous approach.
4. Nevertheless, should the planning inspector conducting the Public Examination not support this view, there would be a further opportunity to consider possible alternatives, including further consultation. The revised regulations governing the process stipulate that an Inspector's report and recommendations are no longer binding on the Local Planning Authority and there would appear to be greater flexibility in how the Council responds to issues raised by the Inspector.

### **Sustainability Appraisal**

5. A further query raised is in relation to the Sustainability Appraisal of the draft Development Strategy. The sections of the Sustainability Appraisal relating to the assessment of sites were presented to the Sustainable Communities Overview and Scrutiny Committee meetings on 16 May and 11 June 2011 and the Committee was able to consider these documents alongside the draft Development Strategy.
6. The Sustainability Appraisal report was a new document produced by Central Bedfordshire Council officers. It used elements of previous analysis to inform the conclusions but not without reviewing the relevance and currency of that analysis. In terms of the relationship

with Luton Borough, the Duty to Cooperate places a clear requirement on Central Bedfordshire Council to work closely with adjoining authorities on strategic planning issues. Any reference in the Sustainability Appraisal to cross boundary working will be made in that context.

7. In terms of the north Luton proposal the Sustainability Appraisal stated *“This development is dependent on the construction of the Luton Northern Bypass and Junction 11A on the M1.”* This statement was not intended to indicate the standard of road provided, nor its routing or timing. Rather, it was simply a statement that there needs to be a strategic link between the M1 and A6 to facilitate this development. This remains the case.
8. The M1/A6 link is perhaps a more accurate term to describe the road than the Luton northern bypass. It remains the case that a road linking the M1 and A6 will be required and the statements made by the Executive Member and by Officers at previous meetings still stand.

#### **M1/A6 link road**

9. In relation to the specific query about the proposed road between the M1 and A6, the revised Development Strategy to be considered by Executive and Council in November will clarify the authority’s position.
10. Historically, this link road has been seen as part of a wider Luton northern bypass route linking the M1 with the A505 to the east. As part of the work undertaken by the Joint Technical Unit the cost of the link between the M1 and A505 was estimated at around £480m. At the time (2010) the cost-benefit ratio was considered to be questionable. In the current economic climate, this link is simply unaffordable.
11. The proposals for the link between the M1 and A6 contained in the Joint Core Strategy were, to some extent, a remnant of the wider Luton northern bypass scheme. The cost of the route between the M1 and A6 outlined in the Joint Core Strategy was estimated at being *at most* between £100m and £140m. This route would have been for a two-lane dual carriageway road, accommodating speeds of 70mph and including bridges across it. Given recent experience with the urban extension at North Houghton Regis, this cost is beyond that which could be secured from a development of the size proposed (4,000 dwellings).
12. As things stand, there is little likelihood of securing major public funding for such a scheme. It was therefore necessary to consider alternatives that achieved the aims of alleviating traffic congestion in local villages, whilst also accommodating development. This process was started through the draft Development Strategy (June 2012), where the route of the bypass was not specified but a Framework Plan provided for, which would consider the detailed route, timing and phasing of the road. The revised Development Strategy to be considered by Executive

and Council in November will contain more detail in terms of the broad parameters for this road but the detail will be worked up and consulted on through the Framework Plan process.

13. Broadly, this road will need to perform a number of functions. It will act as a “strategic” link in terms of providing a route between the two major roads of the M1 and A6. It will provide an alternative route for HGVs rather than travelling through the local villages. In addition to these roles, the road will accommodate the traffic arising from the development proposed to the north of Luton (around 4,000 dwellings and 20ha employment land) and the Sundon Rail Freight Interchange proposal.
14. Such a road would not need to be to the same specification as that contained within the joint strategy. Specifically, the road would not need to be dualled except for that part connecting Junction 11A of the M1 with the proposed rail freight interchange. Additionally, the road would not need to be of a standard which allowed speeds of 70mph, nor would it, for this reason, require bridges across it or a high level of lighting. All of these changes would result in a cost substantially less than for the bypass set out in the joint strategy.
15. The Development Strategy will require the road to be in place as soon as possible but it will need to be realistic about the funding arrangements. Developers are only likely to be able to make a limited contribution to the road upfront, in advance of housing completions. It is likely that the road would need to be completed in stages, as housing completions progress. The fact that this road will be delivered in stages will not ultimately affect its ability to perform a strategic function. The detailed arrangements for this staged approach would need to be considered through the Framework Plan process.

### **Summary**

16. In summary, the concern that a planning Inspector would be able to make unilateral changes to the Strategy without consideration by this Council or public consultation is considered to be unfounded.
17. In terms of the M1/A6 link road, officers consider that it will be possible significantly to reduce the price of this road whilst at the same time retaining its strategic function. The broad parameters of this will be set down in the next iteration of the Development Strategy but the details will be worked through and consulted on through the Framework Plan process.