

18 April 2013

Sue Frost
Interim Local Planning and Housing Team
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Shefford
Bedfordshire
SG17 5TQ

Dear Ms Frost,

REPRESENTATIONS TO THE EAST OF LEIGHTON LINSLADE FRAMEWORK PLAN AND ASSOCIATED PLANNING APPLICATIONS ON BEHALF OF ALISON CHILTERN - HUNT

These representations are submitted on behalf of Alison Chiltern-Hunt, following our meeting with your colleague David Hale on 20 March 2013. Alison Chiltern-Hunt is the freeholder of the land edged red on the attached plan (DTZ1), extending to 5.4 ha (13.4 acres). The land is located to the north east of Leighton Linlade on the northern side of Vandyke Road and currently in agricultural use.

We understand that the public consultation on the East of Leighton Linlade Framework Plan ('the Framework Plan') took place in November / December 2013. We were not contacted as part this consultation despite having had meetings with adjoining land owners (Arnold White Estates) to discuss their proposals in 2011 who could have given your Council our contact details. As such, we have not commented on the proposed Framework Plan to date.

Additionally, up to this point we have not commented on the main planning applications submitted in 2008 and 2011 by adjoining landowners (Chamberlains' Barn - SB/08/00329/OUT, CB/11/01937 and Clipstone Park - CB/11/02827/OUT). These applications do not include the land owned by my client but will have a significant impact on this land if approved.

This letter sets out our comments on the above documents.

East of Leighton Linlade Framework Plan

These representations are submitted with reference to paragraph 182 of the National Planning Policy Framework which sets out the tests of soundness against which draft Local Plans are to be examined but also form a strong framework against which all emerging planning policy can be assessed.

These are:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

Our client is strongly supportive of the wider intentions of the draft Framework Plan and the principles behind the proposals for the East of Leighton Linlade urban extension. We do not however, consider that the proposed allocation of our client's land for employment use has been considered in sufficient detail to ensure it has been positively prepared, justified, effective or sustainable and in accordance with National Policy.

We understand that the allocation of my client's land reflects the original masterplan for the area produced by Arnold White Estates in their 2008 application and more recent discussions the Council have had with the promoting landowners.

Our concern is that a robust and evidence based case in support of the allocation of this land for employment use has not been made and on this basis we consider that:

- The allocation has not been positively prepared as there has been no employment study undertaken to gauge the viability and sustainability of employment uses at this location.
- The allocation is not currently justified as the two further employment zones located towards the southern end of the proposed extension (circa 11 ha (27 acres)) provide a more sustainable development cluster for employment uses with better transport links and future access to the national motorway network via the proposed Houghton Regis link road to the M1.
- The allocation of the land in question is not effective as it is not deliverable in terms of financial viability and will not be developed for the proposed uses within the development timeframe.

The more accessible employment zones proposed near Stanbridge Road are large enough to generate a 'critical mass' of employment floorspace. This would support ancillary and complementary facilities creating a successful employment hub. Employment development at Vandyke Road would struggle to attract developers and occupiers when in competition with these more sustainable alternatives. As the Stanbridge Road zones would provide a sufficient supply of employment floorspace to satisfy demand generated by the urban extension, Vandyke Road would not be developed for employment use and may subsequently be promoted for alternate uses.

- The development of employment uses in this location would not be sustainable. Notwithstanding the above points, if a further employment zone were developed in this location, occupiers could be drawn away from the town centre. This would damage the economic vitality of the Town Centre and increase the number of car trips generated as occupiers will no longer benefit from the public transport facilities available in central Leighton Buzzard.

We do not consider that the above points are insurmountable but require further robust, evidence based studies to be produced that support of this allocation. These should identify suitable and sustainable employment generating uses and a clear strategy for development of this land for the uses proposed.

Current Planning Applications

As with the Framework Plan, we are broadly supportive of the development proposals set out in the planning applications CB/11/01937 and CB/11/02827/OUT.

Our concerns are that the land owned by our client has been excluded from the Chamberlains Barn application (CB/11/01937) but the site has been identified as 'future employment land'. Notwithstanding our above comments on the suitability of this land for employment uses in the absence of detailed employment studies, we consider that the exclusion of this land from the planning application would lead to piecemeal development. The impact of this would be magnified as a result of the site's location adjacent to the proposed Neighbourhood Centre, an import focal point for the wider development.

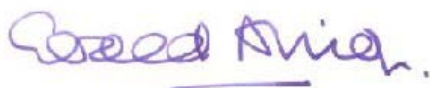
To ensure the development East of Leighton Lindslade is successful and capable of delivery, and the neighbourhood centre is served by complementary employment generating uses, a detailed employment study and development strategy that supports the proposed employment allocation should be produced by the consortium currently promoting the wider development.

To ensure that any development strategy for this land is implemented by the promoters, the development of this area for employment generating uses or other complementary uses should be linked to the planning permission granted for the wider development. To this end we consider that a single s106 agreement tying in all the relevant planning applications would ensure comprehensive delivery of planning obligations.

Our client realises the importance and public benefits that would arise from the development as a whole and would be prepared to consider entering into a s106 agreement that addressed the obvious concerns caused by the proposed employment allocation covering their land.

I hope this is clear but I would welcome the opportunity to discuss our findings with you in further detail.

Yours sincerely,



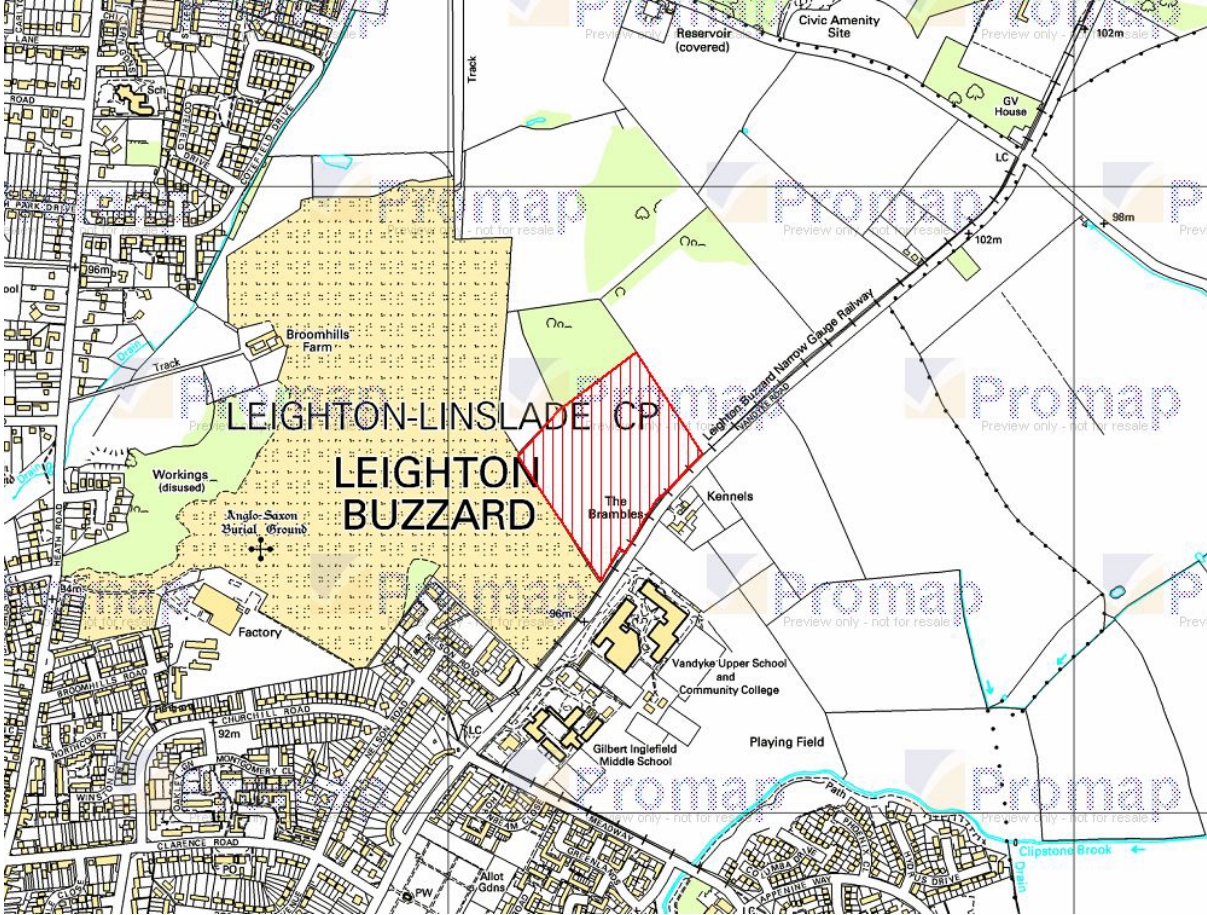
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Copied to:
Alison Chiltern-Hunt
David Hale – Planning Manager South

Alison Chiltern-Hunt – Land ownership



Plan: DTZ1