



Consultation Statement

North of Luton and Sundon RFI Framework Plan (March 2015)



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1 Introduction

1.1 Background

- 1.1.1 This document is a Consultation Statement. It has been written in accordance with Central Bedfordshire Council's (CBC) Statement of Community Involvement, adopted in October 2012. The Statement of Community Involvement sets out the key stages of consultation for Planning Applications and Local Plan Documents. For Supplementary Planning documents it suggests that drafts should be subject to involvement by people and the community in a similar way to Local Plan documents, for a minimum of four weeks. All comments should be considered and fed into the final document if appropriate.
- 1.1.2 This Consultation Statement details the engagement undertaken during the production of the Framework Plan for the Land North of Luton and the Sundon Rail Freight Interchange (RFI) Strategic Allocations, as identified in the emerging Central Bedfordshire Development Strategy (2014). It includes a detailed analysis of the feedback which was received and demonstrates how this feedback was taken into consideration when preparing a final Framework Plan to take to Sustainable Communities Overview and Scrutiny Committee (OSC) and Executive.
- 1.1.3 The Framework Plan has been produced by CBC, working in partnership with both the North Luton Consortium (NLC) and Prologis, who are the developers of the sites.

1.2 Framework Plan

- 1.2.1 The Framework Plan is a high level document which has been produced to show how the development, as outlined in the emerging Development Strategy, could be progressed. The Framework Plan is not intended as a rigid Masterplan, rather as a guide to inform future masterplans and planning applications, and therefore retains an element of flexibility.
- 1.2.2 The Framework Plan aims to:
- Establish an overall framework which identifies the opportunities of both Strategic Allocations and maximises their development potential.
 - Provide a level of certainty for communities, stakeholders and developers.
 - Explain the mechanism for consultation and the process moving forward.
 - Identify technical work required through subsequent masterplanning and planning applications.
 - Provide an indication of likely Planning Obligations to be provided as part of the development.

2 Policy

2.1 National Policy

2.1.1 Paragraph 155 of the National Planning Policy Framework states:

'Early and meaningful engagement and collaboration with neighbours, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that local plans, as far as possible, reflect a collective vision a set of agreed priorities for the sustainable development of the area'

2.1.2 Paragraphs 188-191 also note the participation of other consenting bodies in pre-application discussions should enable early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle. The guidance notes Local Planning Authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage, which can improve the efficiency and effectiveness of the planning application system for all parties.

2.2 Local Policy

2.2.1 The Development Strategy (2014) is currently undergoing public Examination by a Planning Inspector with the second round of hearings expected to continue in Spring 2015. It is this Examination which will assess the principle of the allocation of both sites. This Framework Plan has been written to demonstrate how the required development could be delivered on the sites.

2.2.2 The Development Strategy allocates Land North of Luton and Sundon RFI under policies 61 and 64 respectively. The supporting text for these policies states that a Framework Plan will be prepared as technical guidance. It states that the Framework Plan will be prepared in partnership between the developers and Central Bedfordshire Council, and in consultation with Luton Borough Council, service providers and statutory bodies.

2.2.3 The Planning and Compulsory Purchase Act 2004 requires Local Authorities to prepare a Statement of Community Involvement. CBC adopted their Statement of Community Involvement (SCI) in October 2012. Consultation on the Framework Plan has met the requirements of the SCI and any future masterplans or planning applications will need to comply with the guidance given in the SCI for major applications (para 6.11):

- *"Developers or landowners take a key role in this [public consultation] as part of their obligation to the local community;*
- *Consultation carried out at the earliest stage of the application process with local people to explore their reactions and optimise potential community benefits as part of the development;*
- *Extra effort made to engage with hard to reach groups;*

- *Exhibitions and/or workshops being held to involve people in a non confrontational way, if appropriate.”*

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3 Previous consultation

3.1 Outline

3.1.1 As stated previously, the principle of development for both Strategic Allocations has been subject to extensive public consultation through the Local Planning process. Both sites were consulted on as part of the consultation undertaken for the Joint Core Strategy and then the Development Strategy, as detailed below. This Framework Plan reflects on the comments made through these Local Plan consultations.

3.2 Joint Core Strategy for South Bedfordshire and Luton

3.2.1 Land to the North of Luton and Sundon RFI were first identified as strategic allocations in the Joint Core Strategy for Central Bedfordshire and Luton. This document was prepared between 2007 and 2010 and was informed by four stages of extensive consultation. Development options, and subsequently preferred options, were consulted upon using community forums, exhibitions and workshops which were extensively advertised and well attended. Static displays were also available to view in key locations in South Bedfordshire and Luton. Formal periods of public consultation, whereby documents were published and written responses could be submitted, were also conducted and these opportunities were well advertised.

3.3 Development Strategy for Central Bedfordshire

3.3.1 Following the withdrawal of the Joint Core Strategy in 2011, Central Bedfordshire Council prepared a new Development Strategy to guide development in Central Bedfordshire. Land to the North of Luton and Sundon RFI were included as locations for growth within this Local Plan and consulted upon through three stages of consultation. Initial engagement commenced in December 2011 with workshops and a period formal consultation where over 6,000 people and stakeholders were notified. Subsequent consultations in 2012 and 2013 involved formal periods of consultation whereby documents were published and written responses could be submitted, this was supported by exhibitions and further workshops. All consultation activities were well publicised and documents were readily available in public locations and on the Council's website.

3.4 Engagement in preparing the Framework Plan

3.4.1 In developing the Framework Plan the Council, NLC and Prologis engaged with specialist organisations and CBC Officers. This enabled preliminary views to be taken into account in preparing the Framework Plan and ensured that the final draft was fit for purpose.

- 3.4.2 Meetings were held with organisations including the Chilterns Conservation Board and Network Rail early in the process; and a number of internal meetings were also held with CBC transport, education, highways, environment and leisure Officers for example. CBC also engaged with specialist Officers from Luton Borough Council, including highways, local plans and education.
- 3.4.3 An afternoon workshop was arranged with CBC Officers on the afternoon of 16th September 2014 to gain informal feedback on the Framework Plan prior to formal publication. This workshop followed an open discussion format allowing all officers to put forward their points of view and raise any queries or areas of concern with the Local Planning Team, NLC and Prologis. Following this workshop, officers were given the opportunity to submit any comments in writing to the Local Planning Team.
- 3.4.4 The views raised through this early engagement helped share the final draft Framework Plan.

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4 Formal consultation on Framework Plan

4.1 Outline

- 4.1.1 A formal period of consultation on the Framework Plan ran from 10th November to the 5th December 2014. This period of five weeks exceeded the minimum requirement set out in the CBC Statement of Community Involvement (SCI), which requires a four week consultation for masterplans.
- 4.1.2 CBC led the consultation with assistance from the NLC and Prologis, and Camargue PR were appointed to assist with the publicity material and exhibition events. The aim of the consultation was to engage residents, community groups, local businesses and statutory consultees to gain feedback on the draft Framework Plan. The consultation enabled comments to be made on:
- The vision for the area and the distribution of land uses; and
 - The preferred route of the M1-A6 Link Road.

4.2 Duty to Cooperate

- 4.2.1 Appreciating the proximity of the site to Luton Borough and complying with the Duty to Cooperate were key aspects of the consultation. The Consultation Strategy was discussed with Luton Borough at a meeting between officers held in September 2014. At this meeting it was agreed that:
- Posters be displayed across Luton at suggested locations;
 - CBC Officers would attend the Luton North Area Board meeting on 16 October 2014 to give a presentation on the Framework Plan proposals;
 - An exhibition be held in Luton;
 - Copies of documents be made available in public places in Luton;
 - The consultation was covered in local newspapers that circulate in the area; and
 - An advert be placed in November 2014 edition of *Lutonline*, the newsletter sent to Luton residents.
- 4.1.4 A further meeting was held with Luton Borough Council's local planning officers in October 2014 to provide an overview of the draft Framework Plan in advance of the public consultation.

4.3 Publicity

Website

- 4.3.1 A dedicated page on the Council's website was set up with a memorable and short address:

www.centralbedfordshire.gov.uk/north-luton

This website address was published on:

- Consultation documents;
- Letters/ emails/ leaflets sent out;
- Posters; and
- At public exhibitions.

4.3.2 It should be noted that wherever the website address was published, a phone number was also provided to allow those without internet access to request paper copies of documents.

4.3.3 All consultation documents were made available on the website in addition to background information, guidance on the next steps following consultation and a section on frequently asked questions. The website also provided the opportunity for residents to complete the consultation questionnaire online.

4.3.4 The website was regularly updated, and has remained live to allow interested parties to keep up to date with progress of the Framework Plan.

Briefing of CBC members and Parish Councils

4.3.5 Neighbouring Parish Councils were notified in advance of the public consultation and provided with key information about the Framework Plan. All CBC Members were also notified via Members Information Bulletin and briefings were held with the Ward Members and Portfolio Holder prior to the commencement of public consultation. A private timeslot was allocated prior to the start of the first exhibition to allow Parish Councils, CBC and LBC Members the opportunity to discuss the proposals with officers before the exhibitions opened to the public.

Attendance at the North Luton Area Board

4.3.6 Officers from CBC attended the North Luton Area Board's meeting on the 16th October. At this meeting officers gave a presentation on proposals and then answered questions.

Letters and Emails

4.3.7 Prior to the start of the consultation, detailed letters and emails were sent to:

- Statutory Consultees;
- Parish Councils;
- CBC and LBC Councillors;
- Local MPs (Andrew Selous, Kelvin Hopkins and Nadine Dorries);
- Libraries in LBC and CBC which were in close proximity to the site (with copies of consultation documents to make available for public inspection)
- All those who had commented on the Development Strategy at Publication in 2014.

- 4.3.8 These letters and emails included information on the consultation and the exhibitions planned for Sundon and Luton. Letters also contained information on where consultation documents could be accessed.
- 4.3.9 Further batches of emails were sent out using *Govdelivery* to all those who had signed up through the CBC website to receive alerts on 'consultations' or 'latest news'. A further email was sent out after the Sundon exhibition to give an update and remind people of the exhibition planned for Futures House, Luton.

Leaflet drop to Streatley, Sundon, Chalton and the northern area of Luton

- 4.3.10 It was agreed with LBC that a leaflet drop to the northern part of Luton was necessary to inform residents of proposals.
- 4.3.11 Around 1,500 leaflets were delivered to all homes and businesses in the parishes of Streatley, Sundon and Chalton; and around 8,500 leaflets were delivered to the homes and businesses in Luton which lie directly south of the Land North of Luton Strategic Allocation. An external distribution company was appointed to do this and used GPS tracking to give an accurate record of where these leaflets had been dropped. These leaflets provided information on the consultation and encouraged people to attend the exhibition events planned for Sundon and Luton.
- 4.3.12 A small number of residents who visited the Luton exhibition event complained that they had not received a leaflet, though lived within the leafleted area. The GPS tracking record allowed officers to confirm that leaflets were indeed delivered to these addresses.

Posters

- 4.3.13 Posters were displayed in locations across southern Central Bedfordshire and north Luton, near to the site. Appropriate locations in Luton were provided by LBC. These posters were displayed in prominent public places and included information on the exhibitions and where to access consultation documents. Where practicable, in locations where posters were displayed, such as libraries and community centres, hard copies of the Framework Plan were also made available.

Social Media

- 4.3.14 Officers from CBC's Communications Team ensured that both the consultation and the exhibition events were well publicised on the Council's Facebook and Twitter pages, providing notifications at regular intervals. The Communications Team also monitored these pages and responded to any comments or messages this generated.

Press

- 4.3.15 Information on the consultation was placed in CBC's Winter edition of *News Central*. *News Central* is a free magazine delivered to residents of Central Bedfordshire four times year and also published online. Since *News Central* only captures Central Bedfordshire residents, an advert was also placed in the November 2014 edition of *Lutonline*, a monthly newsletter prepared by LBC and delivered to 72,000 homes across Luton as well as being made

available in libraries, community centers, leisure centers, council offices and online.

4.3.16 Detailed articles were also published in *Staff Central*, the weekly email newsletter sent to all employees at CBC, and the Members Information Bulletin. This increased awareness amongst staff and members, and articles included contact details for relevant officers to be used for any external or internal queries.

4.3.17 A press release was also issued to all the newspapers which covered the Luton, Streatley and Sundon areas at the start of the consultation period, and this gave good press coverage. A second press release was issued after the first exhibition to provide feedback on the high level of attendance and publicise the second exhibition date.

4.4 Exhibitions

4.4.1 Two public exhibitions were held during the consultation period:

- Sundon Village Hall, Saturday 22nd November 2014 10am-2pm
- Futures House (Luton), Friday 28th November 2pm-8pm

4.4.2 Both exhibitions were scheduled to take place mid way through the consultation period to allow people the opportunity to read through the draft Framework Plan before they came to the exhibitions with any specific questions. The exhibitions were both well staffed by CBC and representatives of the NLC and Prologis in anticipation of people coming in with questions.

4.4.3 Sundon Village Hall was chosen as an exhibition venue due to its accessible large hall and proximity to the site. This exhibition was held on a Saturday to allow people who might work during the week to attend. A large number of Central Bedfordshire residents attended this exhibition, but also a number of residents from Luton.

4.4.4 It was agreed with Luton Borough Council that an exhibition be held in Futures House in Marsh Farm to ensure that Luton residents had the opportunity to attend. This event went on into the evening to ensure that people could attend after work if they wished.

4.4.5 Both exhibitions were set up with static boards displayed around the room and larger plans placed on central tables. The boards gave information on the proposals; suggested benefits of development; explained the concept of an RFI; and detailed the next steps. An interactive board was also provided to allow people to attach comments on sticky notes.

4.4.6 The boards from these exhibitions were displayed in the reception area of CBC's Chicksands offices following the Futures House exhibition and remained there until the consultation period closed. Electronic copies of these boards were also provided online. In addition to this a specialist poster was produced for Futures House which contained the content of the exhibition boards and this was displayed until the end of the consultation period.

- 4.4.7 At both exhibitions requests were taken for hard copies of consultation documents, these were then posted following the exhibition. Copies of consultation documents were also left at Futures House.
- 4.4.8 In total 222 people attended the Sundon exhibition with a further 128 attending the exhibition at Futures House.

4.5 Questionnaire

- 4.5.1 A questionnaire was provided to allow consultees to respond to the Framework Plan. This could be completed online via the dedicated webpage; a pdf of the questionnaire could be downloaded from the dedicated webpage; or paper copies were made available on request and at the exhibitions. Some questionnaires were collected at the exhibition events and a freepost address was also set up for paper copies. There was also an email address (LDF@centralbedfordshire.gov.uk) to send any electronic copies of the questionnaire.
- 4.5.2 The questionnaire sought views on the following:
- The vision and aims guiding the Framework Plan;
 - The Framework Plan's approach to the local context, including features, constraints and opportunities in and around the site;
 - Strategic highway infrastructure;
 - Green infrastructure;
 - Transport;
 - Community uses;
 - Education;
 - Homes;
 - Employment;
 - Infrastructure;
- There was also a section for any further comments.
- 4.5.3 Some consultees chose to send letters in response to the consultation rather than using the questionnaire. These were received by email or by post via the freepost address.

5 Results of consultation

5.1 Responses received

5.1.1 In total 171 responses were received to the consultation, 140 of these were received through the questionnaire (received online, via email, through the freepost address or collected at exhibitions). The other 31 responses were letters, of which 25 were sent by email and three using the freepost address. Three further responses were received from CBC officers.

5.2 Issues identified

5.2.1 The issues identified have been discussed in detail in the report appended to the OSC report. The resulting changes to the brief are also appended to the OSC report. (to be included in this Consultation Statement on adoption)