Proposed changes to the North Luton and Sundon RFI Framework Plan – non-questionnaire responses

Reference	Name	Summary of Key issues	Response	Changes to the Framework Plan
EM1	David Logan	a. Objects to the principle of	a. The principle of development will	a. No change required.
		development on greenfield land on	be tested through the Development	b. No change required.
		the southern side of the Chiltern	Strategy examination and cannot	c. No change required.
		ridge because it would destroy the	be considered through changes to	d. No change required.
		'sense of place' of the Chiltern Hills	the Framework Plan. The Chilterns	e. Paragraph 4.2.1 revised to
		in this locality – the principle	AONB has been a key	clarify that a link to the A505 falls
		topographical and historical feature	consideration in developing the	beyond the remit of the Framework
		in this part of England.	Framework Plan and a number of	Plan and the CBC will work with
		b. Comments on CBC's predictions	mitigation measures are identified.	neighbouring local authorities to
		regarding growth in background	b. Future detailed transport	assess its feasibility further
		traffic and additional post	modelling/assessments will further	f. Reference to John Bunyan Trail
		development traffic within Luton's	consider and identify the level of	and Icknield Way Path included in
		highway network (and the nearby	traffic, and identify mitigation	paragraph 3.2.5.
		section of the M1) as being both	measures that address the issue of	
		unsound and that they are likely to	congestion, particularly on the A6.	
		be double what has been asserted.	Section 4.11 of the Framework	
		c. Objects to building new houses	Plan sets out the need for	
		in close proximity to and as an	increasing the attractiveness of	
		extension of Luton's existing urban	sustainable transport to reduce car	
		area as this would maximise the	dependency. These demand	
		proportion of cars related to new	management measures are also in	
		houses which would enter the	line with Luton Borough Council's	
		already congested roads within	approach to tackling congestion as	
		Luton, the A6 in particular.	set out in a number of their strategy	
		Furthermore, very concerned that	documents.	
		increased congestion will threaten	c. See comment b. above.	
		Luton as a sub-regional centre for	d. This is a strategic level issue	
		shopping, for other business and	being considered through the	
		for emergency responses.	Development Strategy and	
		d. Objects to CBC (and others)	therefore falls outside the scope of	
		pursuing unsustainable housing	the Framework Plan. The	
		demand largely caused by ongoing	Development Strategy makes	
		inward migrations into this locality	provision for 5,400 homes that will	
		and misleadingly referring to it as	help meet the identified housing	
		housing need (which really ought	needs of Luton which cannot be	
		to be based upon the natural	met within the borough boundary.	
		growth of the population).	The North of Luton site will provide	
		e. Objects to the promotion of a	homes to help meet this need.	

Reference	Name	Summary of Key issues	Response	Changes to the Framework Plan
		non-strategic M1 to A6 road link, misleadingly referred to as a strategic link, which, in the absence of links being in pace beforehand to both the A505 East of Luton and to Airport Way, will drag strategic traffic and additional local traffic onto already congested local roads within Luton and along rural roads in CB and NHD. f. Need to recognise the historical significance of the greenfield areas to the south and west of Streatley Village, notably their connection with John Bunyan and his allegorical references to this locality in 'Pilgrim's Progress'.	e. The M1-A6 Link Road will benefit the wider transport network and provide access to the strategic allocations (Land North of Luton and Sundon RFI). It forms part of a wider east-west orbital route around the Luton, Dunstable and Houghton Regis conurbation linking to the A5-M1 Link via the new Junction 11A. An extension of this strategic link between the A6 and A505 is not required to support the North of Luton and Sundon RFI developments and cannot be addressed through changes to the Framework Plan. CBC will however actively pursue separately with LBC, to look at the options and funding opportunities to take this forward in terms of wider subregional infrastructure requirements. f. The M1-A6 Link Road will provide a long term defensible northern boundary to Luton and the proposed development will provide a softer edge to the urban area through lower density development and landscaping along the northern edge. Reference can be made to the John Bunyan Trail and Icknield Way in the Framework Plan text.	
EM2	Anglian Water	a. Set out the infrastructure requirements for the site.	This will be considered through future detailed masterplanning and planning applications.	a. No change required.
EM3	Aylesbury Vale DC	a. Support the proposal	a. Support welcomed.	a. No change required.

EM4	Thames Water	a. Set out planning/infrastructure considerations moving forward.	a. This will be considered through future detailed masterplanning and planning applications.	a. No change required.
EM5	The Chiltern Society	 a. The route of the link road should be further south. b. The location of the AONB needs to be shown on the Plans CBC should make provision elsewhere for the loss of AONB 	a. A number of potential routes for the Link Road have been assessed and consulted upon. The preferred route has been selected based on technical evidence. The detailed route will be determined through the masterplanning and planning application process. b. The Chilterns AONB is shown as a hatched area on both the Constraints Plan (page 19) and Concept Plan (Appendix 1).	a. Additional wording included in section 4.2 to justify the route of the Link Road.b. No change required.
EM6	Harlington Parish Council	a. The Framework Plan isn't sufficiently detailed. b. There is an absence of detail on residential densities. c. The road alignment isn't sufficiently justified. d. The development proposes too much green space. This should be reduced to reduce the loss of Green Belt. e. The primary school will have an adverse impact on the AONB. f. The Framework Plan doesn't include sufficient additional detail on the RFI. The RFI will have a significant impact on the setting of the AONB and references to the RFI should be included in the design principles section, particularly in relation to building heights.	a. The level of detail is sufficient for a high level Masterplan which demonstrates how the policy requirements can be accommodated and delivered on site. Future masterplanning will be in greater detail. b. Paragraphs 4.16.2 and 5.1.4 refer to varying densities across the site which is considered appropriate at this stage. Exact densities will be determined through detailed masterplanning and future planning applications. c. The justification for the Link Road alignment will be made clearer in section 4.2. d. The overall open space provision is in accordance with the adopted standards specified by the CBC Leisure Strategy. Include references to the Leisure Strategy in the text. e. The open space associated with	a. No change required. b. No change required. c. Additional wording included in section 4.2 to justify the route of the Link Road. d. References to CBC's open space standards as set out in the adopted Leisure Strategy included in the Aims (6) and paragraph 4.5.1. e. Additional text included in paragraphs 3.4.1 and 4.6.1 clarifying that the open space provision associated with the primary school is located within the AONB; referencing the requirement for sensitive design and landscaping; and referencing design in accordance with Chilterns Conservation Board guidance. f. Additional detail included on the RFI in relation to presence of Open Access Land in paragraphs 3.5.3 and 4.5.1; and additional

			the central primary school will fall within the extent of the AONB whilst the school buildings will remain outside. Both the buildings and external spaces including playing fields will be sensitively designed to respect the AONB and in accordance with the Chilterns Buildings Design Guide, Management Plan and Environmental Guidelines for the Management of Highways. Measures to integrate development within the landscape setting will be required. f. There is less emphasis on the RFI although the level if detail is proportionate to this stage in the process and the North Luton site proposals. Reference is made to sensitive design in Aim 11 (paragraph 2.3.1) but additional wording will be included under section 5.1 Design Principles.	paragraph included in section 5.1 setting out the design considerations for the RFI.
EM7	Luton Borough Council	a. Requesting more clarity on the width of the green buffer along the southern edge of the site. Requested 250m through the representation to the Development Strategy. b. The Plan should confirm the exact percentage of affordable housing and the mechanisms to ensure Luton's residents have access. c. The secondary school should be located on the southern edge of the site. d. Walking and cycling routes should connect to the extensive	a. The width of green buffer will be determined through more detailed masterplanning as there will be varying widths depending on location, topography and ecological and heritage features on the ground. There is a significant amount of open space being provided overall and this reflects the need to provide north south connections from Luton and through to the AONB. b. This is a high level strategic masterplan which refers to the target percentage as 30% (para 4.16.1). The exact figure is not yet	a. Additional references to the purpose, varying width and future masterplanning of the green corridor along the northern edge included in paragraphs 3.6.6, 4.8.1 and 6.2.2. b. Reference to 30% as the CBC policy target in the emerging Development Strategy included in paragraph 4.16.1. c. Both sites will remain on the Concept Plan. Paragraph 4.14.1 revised to state CBC's preference for the central location. d. Reference included in section 4.11 to working with LBC to ensure

- network in north Luton.
- e. Bus routes should serve the whole development including the eastern parcels.
- f. Need to consider the draft Water Cycle Strategy and the Surface Water Management Plan which identifies two critical drainage areas on the site.
- g. The Framework Plan should account for the role of Bramingham Local Centre to serve the SA, which isn't noted on the Concept Plan.
- h. Confusion over the train station symbol at Sundon RFI on the Option 2 Concept Plan.
- i. Central Bedfordshire Council are urged to explore with Luton Borough Council and try to resolve the absence of a strategic connection from the proposed M1-A6 strategic link road further east to the A505.
- known and will become clear through future detailed masterplanning and planning applications. The NPPF states that policies should be sufficiently flexible to take account of changing market conditions over time (paragraph 50). The Development Strategy policy requires the use of a review mechanism to increase the provision should viability improve over the life of the development.
- c. The two sites shown are considered to be the most appropriate options. The location of the secondary school will remain flexible as identified on current Concept Plan. The central location is CBC's preferred site and this could be referred to in the written document.
- d. Agree. Section 4.11 sets out the approach to sustainable transport. It is considered that connections could easily be provided into Luton's extensive walking, cycling and public transport network and destination signage to tie into the infrastructure already in place will also be provided. Consultants are in the process of preparing a Sustainable Transport Strategy for the North of Luton site with more detailed options on this. CBC will work with LBC to identify the necessary sustainable transport measures.
- e. Agree. It is envisaged that the current frequent bus services will be extended into the site through

- sustainable transport options can be provided and to Sustainable Transport Strategies to identify opportunities for non-car based travel.
- e. Added a further bus symbol to the eastern parcel. Included text to section 4.11 referring to the preparation of Sustainable Transport Strategies.
- f. No change required.
- g. Added Bramingham local centre on the Concept Plan.
- h. Revised the Concept Plan and key. Removed the train station symbol and replaced with railway line graphic.
- i. Paragraph 4.2.1 revised to clarify that a link to the A505 falls beyond the remit of the Framework Plan and the CBC will work with neighbouring local authorities to assess its feasibility further.

			new or improved bus services. f. Agree. Further technical work on drainage will consider this and inform detailed masterplans and planning applications. g. Agree. h. Agree. i. This issue cannot be addressed through changes to the Framework Plan as the North of Luton and Sundon RFI allocations cannot deliver the connection. CBC will however actively pursue separately with LBC, to look at the options and funding opportunities to take this forward in terms of wider subregional infrastructure requirements. In the meantime further ongoing dialogue with transport officers in Luton will look to identify measures to help combat traffic congestion resulting from any increase in traffic as a result of the urban extension.	
EM8	Tom Chevalier Chairman of Icknield Way Path National Trail	a. The Framework Plan fails to identify designated Open Access Land. There should be formal access, ideally as a green corridor, to enable access into the Sundon Quarry Open Access area.	a. Noted and references could be included in the Plan. Need to maintain and manage site for its ecological value as well as allowing access.	a. Added reference in paragraph 3.5.3 and 4.5.1 to Open Access Land; and included Open Access Land as GI on the Concept Plan (as shown on Natural England's open access maps).
EM9	Bedford Borough Council	a. No comments.		a. No change required.
EM10	The Ramblers Association (Bedfordshire Area)	 a. Welcome the enhancement of the Theedway but this needs to be actioned early to ensure the protection of the area. b. Existing Rights of Way including the John Bunyan Trail are shown 	a. Detailed masterplanning will identify the width and phasing of the green buffer along the route of the Theedway, and it may need to vary due to topography, land uses and features on the ground such as	 a. No Change required. b. Reference to John Bunyan Trail and Icknield way Path included in paragraph 3.2.5; and Concept Plan revised to ensure footpaths 4 and 5 are routed along green corridors.

		smothered by residential development or positioned directly adjacent to highways which contradicts the text in the document. All footpaths should be routed along the greenways and not absorbed into the development. c. Seeking new Rights of Way linking bridleways from Bramingham Wood and Leagrave Park in the south to Sundon Footpath no.12 in the north.	ecology and heritage. b. Agree. Locally valued routes such as the Icknield Way Path and the John Bunyan Trail should be acknowledged in the Framework Plan text. The Concept Plan can be amended so that Footpaths 4 and 5 form the green corridor between the two parcels of residential to the north of the Hospice. The layout of the development parcels in this location should also be amended. This new green corridor is in addition to the one shown directly to the west of the Hospice. c. Opportunities will be sought to create new footpath links where possible, as set out in paragraph 3.2.5.	The current corridor shown in the eastern parcels has been moved further west to encompass and enhance the footpaths. c. No change required.
EM11	David Chamberlain Resident	a. Traffic issues on Sundon Park Road and surrounding area will be exacerbated. b. New infrastructure should be in place first.	a. Future detailed transport modelling/assessments will identify mitigation measures that address any congestion issues on the existing highway network. Section 4.11 sets out the approach to sustainable transport. Consultants are in the process of preparing a Sustainable Transport Strategy for the North of Luton site with more detailed options on this. CBC will work with LBC to identify the necessary sustainable transport measures. b. Section 6.2 identifies the infrastructure requirements for the sites. CBC will seek early delivery but some development will be needed to fund this.	a. No change required. b. No change required.
EM12	Colin Collier Resident	a. No objection to the housing scheme providing the	a. As above (EM11b).b. As above (EM7i).	a. No change required.b. No change required.

		infrastructure is in place first. b. Link road from A6 to A505 is needed.		
EM13	Linda Bain Resident	 a. Traffic congestion and an increase in lorries. b. Need for separate routes for walkers and cyclists between A6 and Streatley roundabout. 	a. The Link Road and direct route to the RFI provide a more direct link to the M1 and HGV movements will be expected to use this route. CBC will restrict HGV movements where possible (refer to paragraph 4.2.3); and as above in relation to traffic congestion (EM11a). b. Opportunities will be sought to create new footpath links where possible, as set out in paragraph 3.2.5.	a. No change required. b. No change required.
EM14	Robert Gray Resident	a. Concern about impact of traffic on A6.b. Need for alternative routes around the town.	a. As above (EM11a). b. As above (EM11a).	a. No change required.b. No change required.
EM15	Rodney Giles Resident	a. Convert the road between Luton and Streatley roundabout to dual carriage way.b. Should provide all school places.	a. As above (EM11a). b. Section 4.14 of the plan states that the development will provide 3 primary schools, including early year's provision, and a secondary school providing enough school places to cater for the new development.	a. No change required. b. No change required.
EM16	Gordon Atkins Resident	a. Concern over the size and noise levels of the RFI.b. The new junction on M1 should have access to Luton Road.	a. The RFI will be need to respond to the characteristics of the site and its surroundings. Noise will be assessed at planning application stage with any necessary mitigation measures; ensuring noise is limited to acceptable levels. b. The Concept Plan shows a	a. No change required. b. Concept Plan amended to show how Luton Road connects to the new M1 Junction 11A (in the same diagrammatic/simplified format).

			simplified layout for the new Junction 11A and demonstrates how the Link Road connects to the Junction. The approved detailed Junction design shows the connection with Luton Road and the Concept Plan should be amended to reflect this.	
EM17	Mrs A Williams Resident	a. Concern about traffic onQuantock Rise.b. Need for convenience shopping facilities closer to development.	a. As above (EM11a). b. New community facilities, including retail, will be provided within the development to cater for new residents.	a. No change required.b. No change required.
EM18	Cllr Sheila Roden (Luton Borough Council)	a. Concerns about congestion in the Toddington Road area.	a. As above (EM11a).	a. No change required.
EM19	Luton Friends of the Earth	a. Consultation was inadequate. b. Conflict with the Development Strategy. Too many homes and insufficient time to plan the development properly. c. Exceptional need has not been demonstrated to justify green belt release. Homes should be located elsewhere in Central Bedfordshire. d. Lack of connectivity between biodiversity features. Bramingham wood will be segregated from the countryside to the north. e. Adverse impact on the views of and from the Chilterns AONB. f. Quality of life for existing residents will be reduced and has not been considered. Luton is already overcrowded and health facilities are insufficient. The congestion and pollution caused by this development and the loss of green space would lead to poor	a. Public consultation on the Framework Plan was conducted in accordance with the Statement of Community Involvement. b. The principle of development will be tested through the Development Strategy Examination and this falls outside the remit of the Framework Plan. c. The principle of development will be tested through the Development Strategy Examination and this falls outside the remit of the Framework Plan. d. The layout has been structured around a network of Green Infrastructure, taking into consideration the existing features on the ground such as woodland and hedgerows. The Concept Plan will be amended to provide additional green links along the length of Footpaths 4 and 5 which	a. No change required. b. No change required. c. No change required. d. Concept Plan revised to ensure footpaths 4 and 5 are routed along green corridors. e. Additional references included relating to mitigation of impacts on the AONB, including measures relating to the Link Road and primary school located within the AONB (paragraphs 3.4.1, 4.2.2, 4.6.1, 4.6.2, 5.1.3, 5.1.6) f. No change required. g. No change required. h. No change required. i. Included additional paragraph (5.1.6) requiring the sensitive design of the RFI; included reference to the need for further ecological assessments as part of any detailed masterplanning and planning application (new

health.

- g. Luton's car use is already 12% above the national average and the scale of development will increase emissions. Congestion is already at an unacceptable level. The Link Road will increase congestion.
- h. Impact on water supply.
- i. The RFI would have a major adverse effect on the SSSI.
- j. Clarity should be provided on the amount of traffic/freight that will be generated by the development.

- provide an additional connection between Bramingham Wood and the AONB to the north.
- e. The AONB has been one of the principle considerations in preparing the Framework Plan and is referred to throughout the document. The requirement for appropriate mitigation, such as landscaping and building design is specified and references are made to Chilterns Conservation Board guidance. The two built uses within the AONB (school playing fields and section of the Link Road) will be carefully planned and designed mitigate against any impact on the AONB.
- f. The Framework Plan meets the overall open space requirements in CBC's adopted Leisure Strategy. Reference is made to the provision of new community facilities, such as health facilities, to meet the needs of the population. The delivery of health facilities will be determined through a health impact assessment provided in conjunction with the NHS/ clinical commissioning bodies.
- g. Future detailed transport modelling/assessments will identify mitigation measures that address any congestion issues on the existing highway network. Section 4.11 sets out the approach to sustainable transport. Consultants are in the process of preparing a Sustainable Transport Strategy for the North of Luton site with more detailed options on this

paragraph 3.5.4); and revised the Concept Plan to show an increased green buffer between the RFI site and the SSSI/CWS.

j. No change required.

			h. See comments from Anglian Water (EM2) and Thames Water (EM4) above. Water efficiency measures will be required to minimise water consumption. This will be considered through future detailed masterplanning and planning applications. i. Policy 64 requires the enhancement and management of the SSSI, and this is reflected in the Framework Plan. A landscaped buffer will separate the RFI from the SSSI, such that major adverse effects on the SSSI would not arise. Furthermore, the SSSI will be managed such that its ecological value is enhanced. The Concept Plan should be revised to show the extent of the RFI development and a green buffer along the eastern edge. j. Traffic/freight generation will be assessed in detail at planning application stage.	
EM20	Michael Brooks	a. The central section of the Link Road should follow the AONB boundary to minimise incursion. Road lighting should be limited to road junctions and immediate approaches, and should be fully shrouded. b. Para 3.4.1 is inconsistent. School grounds are an incursion into the AONB and its location should be adjusted so it falls outside. c. Bus services should be in place at an early stage of occupation. d. The development should	a. A number of potential routes for the Link Road have been explored in developing the proposals, all of which have been subject to public consultation. The preferred road position (as shown on the Concept Plan) has been informed by technical and engineering studies. The short section of the Link Road which passes through the AONB will be carefully planned and designed to minimise the impact. The detailed route of the road will be determined through the planning application process and	a. Additional wording included in section 4.2 to justify the preferred route of the Link Road and possible mitigation measures. b. Additional text included in paragraphs 3.4.1 and 4.6.1 clarifying that the open space provision associated with the primary school is located within the AONB and reference has been made to the requirement for sensitive design and landscaping. Also included reference to design in accordance with Chilterns Conservation Board guidance.

- support a park and ride service and contribute to bus priority measures on key routes.
- e. Important that an unimpeded segregated east-west cycle route is created, separate from the Theedway.
- f. Segregated cycle tracks should be provided where possible along the key routes into Luton.
- g. The buffering on both Sundon and George Woods is minimal.
- h. The need for green areas for informal recreation and access is not really addressed in the Framework Plan. Reliance can't be placed on the countryside to the north. The development needs to include a medium-sized informal public open space.
- i. Special attention should be paid to building height and traditional design is preferred.
- j. Landscaping needs to be generous throughout. Hard edges need to be avoided and screening should be maximised from all directions. Landscaping on the two parcels to the north of the link road needs to be increased.
- k. Lack of detail on the RFI.
- I. Complimentary spelt incorrectly in para 1.1.2.
- m. A direct link to the RFI from the Link Road is preferred.
- n. A bridge or underpass should enable the Link Road to cross Sundon Park Road.
- o. Lighting at the RFI should be low level and fully shrouded, and not visible beyond the site

- will be informed by future technical work.
- b. The open space associated with the central primary school will fall within the extent of the AONB whilst the school buildings will remain outside. Both the buildings and external spaces including playing fields will be sensitively designed to respect the AONB and in accordance with the Chilterns Buildings Design Guide. Measures to integrate development within the landscape setting will be required.
- c. Section 4.11 sets out the approach to sustainable transport. Consultants are in the process of preparing a Sustainable Transport Strategy for the North of Luton site with more detailed options on this. CBC will work with LBC to identify the necessary sustainable transport measures.
- d. A park and ride facility was previously considered in this location. A successful Park and Ride requires a Luton wide response which falls beyond the scope of this Framework Plan.
- e. The development will create a network of streets which will facilitate cycling across the development, into Luton and to the villages in the north.
- f. CBC will work with LBC to identify opportunities for segregated cycle tracks.
- g. The Concept Plan shows a green buffer around both Sundon Wood and George Wood. The width of these buffers will be

- c. No change required.
- d. No change required.
- e. Strengthened section 4.9 by including reference to walking and cycling routes.
- f. No change required.
- g. No change required.
- h. Included references to CBC's open space standards as set out in the adopted Leisure Strategy in the Aims (6) and paragraph 4.5.1.
- i. Included additional paragraph on design considerations and requirements for the RFI.
- j. Revised Concept Plan to show a more significant green corridor along the northern edge of the north east parcel.
- k. Included additional detail on the RFI in relation to presence of Open Access Land in paragraphs 3.5.3 and 4.5.1. Included additional paragraph in section 5.1 setting out the design considerations for the RFI.
- I. Corrected spelling error at paragraph 1.1.2.
- m. Revised the Concept Plan to include the direct link to Sundon RFI from the Link Road.
- n. Revised paragraph 4.4.2 to explain the approach to Sundon Park Road.
- o. Included additional paragraph in section 5.1 setting out the design considerations for the RFI.
- p. Included additional paragraph in section 5.1 setting out the design considerations for the RFI.
- q. No change required.
- r. No change required.

identified through the detailed s. No change required. boundaries. p. Buildings should be in a darker masterplanning and planning colour to reduce the visual impact. application process. g. Good pedestrian and cycle h. The proposed development access to the RFI is essential. meets CBCs overall adopted open space standards as set out in the r. The route of RoW Sundon FP1 Leisure Strategy. should be addressed in the Framework Plan. Any diversion i. The design principles are set out should not be lengthy. in section 5.1 and the design of the s. The development should seek development will be expected to the opportunity to connect Chalton meet the requirements of the FP12 by extension NE-wards adopted Design Guide and along the development boundary Chilterns Design Guidance. to Lodge Farm and back to Agree. This is emphasised in the Framework Plan particularly in Sundon Road. relation to the northern parcels and boundary. More emphasis could be placed on the landscaping of northern edge of the north-east parcel on the Concept Plan. k. There is less emphasis on the RFI although the level if detail is proportionate to this stage in the process and the North of Luton site proposals. Reference is made to sensitive design in Aim 11 (paragraph 2.3.1) but additional wording could be including under section 5.1 Design Principles. Noted. Will be corrected. m. Through the questionnaire there was majority support for a direct link to the RFI. The Link Road and direct route to the RFI provide a more direct link to the M1 and HGV movements will be expected to use this route. CBC will restrict HGV movements where possible (refer to paragraph 4.2.3).

n. The Link Road will cut through Sundon Park Road and vehicular

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			traffic will be re-routed via a new	
			local road to the RFI junction on	
			the Link Road. Sundon Park Road	
			will become a route for pedestrians	
			and cyclists and an appropriate at-	
			grade pedestrian and cycle	
			crossing point will be provided.	
			 A landscape impact assessment 	
			accompanying any future	
			masterplan or planning application	
			will identify the mitigation measures	
			required to minimise the impact of	
			the RFI. Reference is made to	
			sensitive design in Aim 11	
			(paragraph 2.3.1) but additional	
			wording could be including under	
			section 5.1 Design Principles.	
			p. A landscape impact assessment	
			will identify the mitigation measures	
			required to minimise the impact of	
			the RFI. Reference is made to	
			sensitive design in Aim 11	
			(paragraph 2.3.1) but additional	
			wording could be including under	
			section 5.1 Design Principles.	
			q. Agree.	
			r. This is covered by the	
			Development Strategy (paragraph	
			13.96) and will be determined	
			through detailed design and layout	
			of the RFI site.	
			s. Opportunities will be sought to	
			create new footpath links where	
			possible, as set out in paragraph	
			3.2.5. This will be considered	
			further through the detailed	
			masterplanning and planning	
			application process.	
			Spp. State of the	
EM21	Clifford Basset (land at	a. Promoting alternative site for an	a. The principle of development	a. No change required.
	Junction 12)	RFI. Suggest land adjacent to	and the merit of alternative sites	b. Inserted new paragraph (3.5.4)
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		Sundon Quarry is utilised for employment or mixed use, not an RFI. b. The impact on the SSSI hasn't been sufficiently assessed and potential mitigation hasn't been demonstrated. c. Comments refer back to their Development Strategy representations.	will be tested through the Development Strategy Examination and this falls outside the remit of the Framework Plan. b. A landscaped buffer will separate the RFI from the SSSI, such that major adverse effects on the SSSI would not arise. Furthermore, Policy 64 requires that the SSSI will be managed such that its ecological value is enhanced. The details of any necessary specific mitigation measures will be identified at planning application stage. Paragraph 3.5.4 requires further ecological assessments as part of any future planning application. c. See response to a. above.	referencing the need for further ecological assessments as part of any future planning application. Concept Plan revised to show additional buffering of the SSSI at Sundon Quarry. c. No change required.
EM22	DLA on behalf of AXA and GM	a. Seeking purely employment use on the additional land (between M1 junction and on land north and west of GM plant). b. Have commissioned air quality consultants.	a. Employment uses would be best suited on the additional land between the M1 and the Midland Mainline to compliment existing industrial uses and proposals at North Houghton Regis. A suitable buffer will be required between the new employment uses and the residential areas to the south. b. Noted.	a. Concept Plan amended to show employment uses on the additional land between the M1 and the Midland Mainline. b. No change required.
EM23	Bedfordshire Local Nature Partnership	 a. Not enough detail is provided. b. Lack of detail on the RFI. c. GI provision is based just on topography but should be developed in accordance with the GI Plan. d. Otherwise general support. 	 a. The level of detail is sufficient for a high level Masterplan which demonstrates how the policy requirements can be accommodated and delivered on site. b. Agree that there is less emphasis on the RFI although the level if detail is proportionate to this stage in the process and the North 	a. No change required. b. Additional detail on the RFI included in relation to the need for further ecological assessments as part of any future planning application (paragraph 3.5.4); Concept Plan revised to show additional buffering of the SSSI at Sundon Quarry; reference to the presence of Open Access Land

			Luton site proposals. c. The layout has been structured around a network of Green Infrastructure, taking into consideration the existing features on the ground such as woodland and hedgerows. d. Support welcomed.	included in paragraphs 3.5.3 and 4.5.1; and additional paragraph included in section 5.1 setting out the design considerations for the RFI. c. No change required. d. No change required.
EM24	Chilterns Conservation Board	a. Production of the Framework Plan is generally welcomed but considered premature pending outcome of the Development Strategy. b. Doesn't provide enough detail. c. Need for a stronger commitment to undergrounding power lines. d. Primary aim should be the provision of additional rights of way. e. Object to central primary school on basis of impact of formal playing fields in the AONB. f. Reference to future masterplanning is welcomed. g. Concerned that between the road and built up area there will be pressure for development. Question why the road can't take a more southerly and sinuous alignment.	a. The Framework Plan had been prepared to provide further clarity and detail on how the development specified in the Development Strategy policies could be brought forward. It forms part of the evidence base for the Development Strategy examination and provides a framework to guide future planning applications. b. The level of detail is sufficient for a high level Masterplan which demonstrates how the policy requirements can be accommodated and delivered on site. Future masterplanning will be in greater detail. c. The Framework Plan refers to the opportunity for undergrounding power lines. The wording in 3.2.2 could be strengthened. d. Opportunities will be sought to create new footpath links where possible, as set out in paragraph 3.2.5. e. The open space associated with the central primary school will fall within the extent of the AONB whilst the school buildings will remain outside. Both the buildings and external spaces including playing fields will be sensitively	a. No change required. b. No change required. c. Paragraph 3.2.2 revised to strengthen the commitment to undergrounding the power lines. d. No change required. e. Additional text included in paragraphs 3.4.1 and 4.6.1 clarifying that the open space provision associated with the primary school is located within the AONB; referencing the requirement for sensitive design and landscaping; and referencing design in accordance with Chilterns Conservation Board guidance. f. No change required. g. Additional wording included in section 4.2 to justify the preferred route of the Link Road and possible mitigation measures.

			designed to respect the AONB and in accordance with the Chilterns Buildings Design Guide, Management Plan and Environmental Guidelines for the Management of Highways. Measures to integrate development within the landscape setting will be required. f. Support welcomed. g. A number of potential routes for the Link Road have been explored in developing the proposals, all of which have been subject to public consultation. The preferred road position (as shown on the Concept Plan) has been informed by technical and engineering studies. The short section of the Link Road which passes through the AONB will be carefully planned and designed to minimise the impact. The detailed route of the road will be determined through the planning application process and will be informed by future technical work.	
EM25	Natural England	 a. Details of the buffer between the RFI and SSSI need to be determined. b. Absence of a Landscape Assessment to inform the proposed layout in the Framework Plan. The impact on the AONB has not been determined. 	a. Policy 64 requires the enhancement and management of the SSSI, and this is reflected in the Framework Plan. Such details are a matter for the planning application stage although the Concept Plan should be revised to show a green buffer between the RFI and SSSI. b. The content of the Framework Plan has been based on technical work. This is referred to in the Framework Plan (paragraph 1.4.5).	a. Included additional paragraph (5.1.6) requiring the sensitive design of the RFI; and reference to the need for further ecological assessments as part of any detailed masterplanning and planning application (new paragraph 3.5.4). Concept Plan revised to show an increased green buffer between the RFI site and the SSSI/CWS. b. Reference included referring to the need for further detailed

			Additional technical evidence will be required to inform future detailed masterplanning and planning applications. References should be made to specific technical work in relevant sections. The Chilterns Conservation Board has been consulted throughout the preparation of the Framework Plan.	landscape assessments to inform future masterplans and planning applications (para 3.3.2). Concept Plan revised to show a more significant green corridor along the northern edge of the north east parcel.
L1	Keech Hospice Care (additional comments to questionnaire)	a. Need for an increased buffer between the new residential development and Keech Hospice. b. Queries whether there will be a new access to the Hospice from the A6, via the Link Road.	a. The written document and Concept Plan can be revised to address this. b. The development presents the opportunity to improve the access to Keech Hospice Care and a reference should be included in the Plan.	a. Concept Plan revised to increase the green buffer around the hospice and remove a small parcel of residential to the south; and additional paragraph (4.5.4) included in the written document b. Included reference to opportunities for improved access to be explored through the planning application process in new paragraph 4.5.4.
L2	John and Shirley Walsh Residents	a. The Link Road will create additional traffic on the A6 which cannot cope at present. Highway infrastructure cannot cope with additional traffic. b. Loss of countryside, farmland and the AONB. All should be protected not just specific features. c. The plan gives little or no regard to existing residents. Very little separation between existing homes and the proposed development. A decent spinney would soften the impact of the development. d. The employment will consist of warehousing, with very few jobs and high traffic.	a. Future detailed transport modelling/assessments will identify mitigation measures that address any congestion issues on the existing highway network. Section 4.11 sets out the approach to sustainable transport. Consultants are in the process of preparing a Sustainable Transport Strategy for the North of Luton site with more detailed options on this. b. The principle of development will be tested through the Development Strategy Examination and this falls outside the remit of the Framework Plan. c. The Concept Plan shows a green corridor along the existing northern edge of Luton which will	a. No change required. b. No change required. c. Additional references to the purpose, varying width and future masterplanning of the green corridor along the northern edge of Luton have been included in paragraphs 3.6.6, 4.8.1 and 6.2.2. d. No change required.

			provide separation between the new development and existing residents. The width of green buffer will be determined through more detailed masterplans. d. Land North of Luton and Sundon RFI are expected to create around 3,000 new jobs. Further new jobs will also be created at Houghton Regis North. The Framework Plan identifies the location of employment uses.	
L3	David Roberts Resident	a. Development won't provide community benefits. b. The SSSI is not sufficiently protected. Development will have a significant impact. c. Not clear who will fund and deliver the Link Road and other essential infrastructure. d. The Link Road should be in place before the commencement of development. e. The existing highway network is already congested and the commitment to improving existing roads is questionable. f. There aren't enough jobs to provide for the number of new homes. g. Luton will simply become another commuter town. h. The new rail infrastructure for the RFI is outside of the red line boundary. i. No emphasis on the impact on Sundon.	a. The provision of community facilities and other supporting infrastructure is specified in the Development Strategy policies and Framework Plan. b. Policy 64 requires the enhancement and management of the SSSI, and this is reflected in the Framework Plan. A landscaped buffer will separate the RFI from the SSSI, such that major adverse effects on the SSSI would not arise. The Concept Plan should be revised to show the extent of the RFI development and a green buffer along the eastern edge. c. Paragraph 13.44 of Policy 61 specifies that the Link Road is to be funded through a S106 agreement with the developers and opportunities will be sought to secure external funding. d. Paragraph 13.44 of Policy 61 specifies that the timing and delivery of the road will be informed by detailed transport modelling and viability considerations, and will be delivered as soon as is viably	a. No change required. b. Included additional paragraph (5.1.6) requiring the sensitive design of the RFI; included reference to the need for further ecological assessments as part of any detailed masterplanning and planning application (new paragraph 3.5.4); and revised the Concept Plan to show an increased green buffer between the RFI site and the SSSI/CWS. c. No change required. d. No change required. e. No change required. f. No change required. g. No change required. i. Additional wording included in paragraph 4.6.2 referring to landscaping the northern edge of the site to minimise the impact on Lower and Upper Sundon. Additional paragraph (5.1.6) included in the Plan referring to the sensitive design of the RFI.

any congestion issues on the existing highway network. Section 4.11 sets out the approach to sustainable transport. Consultants are in the process of preparing a Sustainable Transport Strategy for the North of Lutor site with more detailed options on this. 1. Land North of Lutor and Sundon RFI are expected to create around 3.000 new jobs. Further new jobs will also be created at Houghton Regis North. The Framework Plan identifies the location of employment uses. 2. The Development Strategy makes provision for 5.400 homes that will help meet the identified housing needs of Luton which cannot be met within the borough boundary. The North of Luton site will provide homes to help meet this need. h. The new rall infrastructure will fall within the red line boundary. Four sidings will be created off the Midland Malniline to provide pick up/drop off access to the distribution facilities. I. Reference is made in the Framework Plan to the use of landscaping and design to mitigate against any impact on nearby villages. L4 Susanna Glenister a New nursery/early years provision will be required to that the development will provide 3 b. No change required.	
Danana Moon Day provision will be required to that the development will provide 3 D. No change required.	

L5	J Carter	a. RFI is too large and too close to	a. The Framework Plan and	a. New paragraph included (5.1.6)
5	Resident	existing housing in Sundon Road.	Concept Plan should be amended	referring to the design of Sundon
	resident	b. Direct link to the RFI is needed	to clarify the adjacent land uses	RFI in relation to existing
		(as per option 2) and should	and refer to a buffer between the	residential properties; and Concept
		include a bus link.	RFI and existing homes. The size	Plan revised to identify adjacent
		c. The Link Road is needed to	of any buffers and specific	land uses (green buffer between
		alleviate heavy traffic on existing	mitigation measures will be	the properties and RFI, and
		roads.	determined through the detailed	residential along Sundon Road).
		d. Need to retain green area	masterplanning and planning	b. Revised section 4.4 to specify
		around Sundon Road to mitigate	application process.	that access to the RFI will be via a
		impact on residents.	b. Through the questionnaire there	direct highway link to the RFI; and
		e. Public footpaths and bridleways	was majority support for a direct	revised the Concept Plan to include
		should be extended to create an	link to the RFI. Access to the RFI	the direct link to Sundon RFI from
		accessible network.	will therefore be via the new direct	the Link Road.
		f. Sundon Road should remain a	link to the Link Road and HGV	c. No change required.
		low density rural hamlet with	movements will be expected to use	d. See above (a.)
		minimal infill housing.	this route. CBC will restrict HGV	e. No change required.
		g. Land next to the grave yard in	movements where possible (refer	f. Revised the Concept Plan to
		Upper Sundon could have a low	to paragraph 4.2.3). Section 4.11	include a green buffer around
		density frontage.	sets out the approach to	Sundon Road hamlet and
		h. A major supermarket is needed	sustainable transport. It is	residential uses on land directly
		north of Sundon Park, which is too	considered that connections can be	adjacent.
		far for Sundon residents to access.	provided into Luton's extensive	g. No change required.
			walking, cycling and public	h. No change required.
			transport network. A sustainable	
			transport strategy for the RFI site	
			will provide more detailed options	
			on this.	
			c. Agree. The Link Road will	
			alleviate pressure on the existing	
			road network, forming part of a	
			wider east-west orbital route	
			around the Luton, Dunstable,	
			Houghton Regis conurbation, and	
			freeing up capacity on the existing	
			highway network.	
			d. The Concept Plan shows	
			significant green buffers around	
			the Sundon Road hamlet, but	
			could be amended to show an	
			additional buffer to the north. The	

			Concept Plan should be amended to clarify the adjacent land uses. The size of any buffers and specific mitigation measures will be determined through the detailed masterplanning and planning application process. e. Opportunities will be sought to create new footpath links where possible, as set out in paragraph 3.2.5. f. See a. above. g. This land falls outside of the strategic allocation boundaries and the scope of the Framework Plan. h. The North of Luton development will provide new retail facilities for new residents and the existing community.	
L6	Mrs V Cuthbert Resident	a. Congestion on the existing highway network at peak times, which can't be improved as a result of this development. b. The Framework Plan doesn't provide enough detail.	a. As above (EM11a). b. The level of detail is sufficient for a high level Masterplan which demonstrates how the policy requirements can be accommodated and delivered on site. Future masterplanning will be in greater detail.	a. No change required. b. No change required.
P1	CPRE Bedfordshire	a. The Framework Plan is premature as technical evidence has not yet been completed to demonstrate the sustainability of the scheme. b. Concerns over access to the potential minerals depot at the RFI, which appears to be via an existing track from Upper Sundon. c. The footbridges across the Link Road will be highly visible and have a significant impact on the	a. The content of the Framework Plan has been based on technical studies and engagement with specialist organisations. This is referred to in the Framework Plan (paragraph 1.4.5). Additional technical evidence will be required to inform future detailed masterplanning and planning applications. References could be made to specific technical work in relevant sections.	 a. No change required. b. Revised section 4.4 to specify that access to the RFI will be via a direct highway link to the RFI. c. No change required.

		AONB.	b. The potential minerals depot	
		AOND.	isn't referred to in the Framework	
			Plan. This was shown on the	
			exhibition boards as it is being	
			suggested as a potential change to	
			the Strategic Allocation boundary	
			by Prologis. This will be considered	
			by the Inspector in the Examination	
			of the Development Strategy.	
			Through the questionnaire there	
			was majority support for a direct	
			link to the RFI. Access to the RFI	
			will therefore be via the new direct	
			link to the Link Road.	
			c. Green bridges crossing the Link	
			Road are referenced in paragraph	
			4.5.2 of the Framework Plan.	
P2	English Heritage	a. Absence of reference to the	a. Include reference to the historic	a. Included reference to preserving
		historic environment in the Vision.	environment in the Vision.	heritage assets in the final bullet
		b. Paragraph 3.2.4 should also	b. Include a reference to Dray's	point of the Vision.
		refer to Dray's Ditches.	Ditches in paragraph 3.2.4.	b. Included additional sentence at
		c. No indication is given of the	c. The green corridor along the	the end of paragraph 3.2.4.
		width of the green corridor along	northern edge of Luton will vary	c. Included additional sentence at
		the northern edge of Luton, and it	along its length in response to	the end of paragraph 3.6.6
		may need to vary in proximity to	adjacent uses, topographical	clarifying that the width will vary
		the scheduled area of Dray's	features and the presence of other	and will be determined through
		Ditches. However a minimum width	ecological or heritage features,	detailed masterplanning.
		would be helpful for the purposes	such as Dray's Ditches. The	d. Included reference in paragraph
		of masterplanning.	minimum width of this corridor will	3.2.4 to Drays Ditches influence on
		d. Concerns about the close	be identified through the detailed	design in this area; and included
		proximity to the housing directly to	masterplanning process and will	additional sentence at the end of
		the north of Dray's Ditches.	take account of detailed technical	paragraph 4.8.1 stating the need
		Buffering is more generous	assessments, including a	for the corridor to be of a sufficient
		adjacent to Sundon park. The	programme of evaluation for	width to incorporate the scheduled
		document needs to give more	archaeological features and	area and its immediate setting.
		consideration to the significance of	deposits.	e. Included reference to the
			•	consideration of scale, massing
		Dray's Ditches as a boundary. Built	d. References to Dray's Ditches	l · · · · · · · · · · · · · · · · · · ·
		development to the north of Dray's	can be strengthened throughout	and form of the development at the
		Ditches would have a detrimental	the Framework Plan. The Concept	end of paragraph 5.1.3.
		impact on the significance of the	Plan indicates the presence of a	f. Revised Concept Plan to show a

		monument resulting in harm. The Plan needs to consider options for mitigating that harm, particularly increasing the width of the green buffer. e. Section 5.1 advises on the implications that heritage might have on scale, massing and form of the development. Reference should be made to the heritage supplement in the Design Guide. f. The green edge to the development alongside BW10 in the north-east appears too narrow.	green corridor in this location, the width of which will be identified through detailed masterplanning (see above). e. Section 5.1 sets out the design principles for the development. Reference is made to the Central Bedfordshire Design Guide, which includes a supplement on heritage. Reference is also made in paragraph 5.1.3 to the value that should be placed on heritage assets. The Council will expect developers to take this into account in designing the site through the detailed masterplanning /planning application process. f. The need for landscaping along the northern edge of the site is emphasised in the Framework Plan. More emphasis could be placed on the landscaping of the northern edge of the north-east parcel on the Concept Plan.	more significant green corridor along the northern edge of the north east parcel.
P3	Sundon Parish Council	Same letter as CPRE submitted. See comments above (P1).		
INT1	CBC Environmental Policy Team (Responses received following on consultation Framework Plan)	a. SRFI needs to be within the red line boundary b. Chiltern Way promoted route north-south should be shown through the RFI c. Not enough information about the RFI d. Green corridor linking Bramingham Park to George Wood needs to be a direct corridor not the staggered route that is shown. Also needs to provide a green context for Hospice.	a. Separation of the RFI site from North of Luton is appropriate given its coverage by a separate Development Strategy policy (64) and a separate allocation boundary. Both sites are covered by the Framework Plan. b. The route of the Chiltern Way is indicated on the Framework Plan. The Development Strategy policy acknowledges that the route of this Right of Way may need to be altered as a result of the	a. No change required. b. No change required. This matter is addressed at paragraph 13.96 and Policy 64 of the submitted Development Strategy. c. Included additional detail on the RFI in relation to presence of Open Access Land in paragraphs 3.5.3 and 4.5.1. Included additional paragraph in section 5.1 setting out the design considerations for the RFI. d. Revised the Concept Plan to

		e. This corridor should also provide a green bridge across to George Wood f. Prefer option 2 of the framework plan as it provides opportunity to landscape edge.	development, but that any diversion will be kept to a minimum where feasible. c. There is less emphasis on the RFI although the level if detail is proportionate to this stage in the process and the North of Luton site proposals. Reference is made to sensitive design in Aim 11 (paragraph 2.3.1) but additional wording should be including under section 5.1 Design Principles. d. The Concept Plan can be amended so that Footpaths 4 and 5 form the green corridor between the two parcels of residential to the north of the Hospice. This new green corridor is in addition to the one shown directly to the west of the Hospice. e. Green bridges crossing the Link Road are referenced in paragraph 4.5.2 of the Plan. f. Noted. The need for a landscaped edge to the development will be strengthened, particularly in relation to the northeast parcel.	ensure Footpaths 4 and 5 are routed along a green corridor. Moved the current corridor shown in the eastern parcels further west to encompass and enhance these footpaths. The large green corridor to the west of the Hospice remains. e. No change required. Reference already within the Framework Plan and crossing points are indicated on the Concept Plan, but their location has been corrected to reflect the route of the current footpaths. f. Concept Plan revised to show a more significant green corridor along the northern edge of the north east parcel.
INT2	CBC Transport Strategy Team Leader (email)	a. Sundon Park Road will be stopped-up to through traffic as part of the north of Luton development. There are no issues with this in terms of the movement of general traffic. It does raise an issue relating to pedestrian and cycle movements and in particular access to the sport, leisure and residential provision immediately to the north of the M1-A6 Link for those to the south of the	a. Through the questionnaire there was majority support for a direct link to the RFI. This means the Link Road will cut through Sundon Park Road and vehicular traffic will be re-routed via a new local road to the RFI junction on the Link Road. Sundon Park Road will become a route for pedestrians and cyclists and an appropriate at-grade pedestrian and cycle crossing point will be provided.	a. Concept Plan revised to include the direct link to Sundon RFI from the Link Road; Sundon Park Road removed and indicated as a pedestrian/cycle route; and a crossing point included over the Link Road. Revised paragraph 4.4.2 to explain the approach to Sundon Park Road and specify the need for an at-grade crossing.

development site. The lack of a direct pedestrian and cycle link along the alignment of the exist Sundon Park Road would have adverse implications in terms of encouraging sustainable travel movements in the locality. As so we should ensure that a suitable at-grade pedestrian and cycle crossing of the M1-A6 is provide as part of the development proposals.	ch Ch
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