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30<sup>th</sup> November 2016

Dear Sir/Madam,

**North Hertfordshire Proposed Submission Local Plan 2011-2031**

Thank you for consulting the County Council in relation to the above. This letter represents the services, functions and interests of the Environment Department of the County Council.

**Highways**

***Transport Modelling work undertaken to inform the Plan***

- the SHUM model was originally developed to support the Urban Transport Plan and was then used to inform the preparation of the Local Plan. A major update of the model was undertaken in 2012 to satisfy issues raised by Highways Agency (HA). The model was subsequently signed off by the HA as being fit for purpose. This version of the model was then used by both Stevenage BC and North Herts DC to help develop and refine their preferred strategies.
- WHaSH model developed as an extension to SHUM to support Welwyn Hatfield Local Plan work. As this was based on more up to date data (2013) and covered a wider extent of the A1(M), it was used to support the A1(M) strategy.
- Last year it became apparent that due to the amount of development proposed by NHDC in Letchworth and Baldock, there was a need to model

these areas in more detail. It was decided to extend the WHaSH model rather than SHUM and make this the new basis for Local Plan testing along the A1 corridor as it was more up to date and covered a wider area and included the impact of the Smart motorway. This new version of the model was called WHaSH BL.

- The WHaSH BL model was used to test NHDC's final preferred Local Plan strategy this summer. However due to time constraints it does not include the explicit impact of development growth in Stevenage (as the previous runs did). Instead growth external to NHDC is derived from a combination of COMET and Tempro.

### ***The limitations of the modelling***

- whilst the WHaSH BL model coverage now extends to Baldock and Letchworth it does not cover all of the Borough. To assess the impact of the proposed growth on places outside of the WHaSH BL model area there is a need to rely on the outputs of COMET.
- the WHaSH BL model was used to test North Herts Local Plan growth. Although external traffic growth was allowed for this was derived from Tempro and there has been no specific consideration of planned Local Plan growth in Stevenage, Luton or Central Bedfordshire and there is concern that the cumulative impact is not being fully reflected in the outputs.
- the recent COMET run (November 2016) includes specific Local Plan growth across all the Hertfordshire LPA's including Stevenage and is indicating that there are cumulative issues, especially around the junction 8 area which have not been reflected in the WHaSH BL and require further investigation.

### ***Consideration of Mitigations set out in the Infrastructure Delivery Plan (IDP)***

Sections 5.96 to 5.135 of the Infrastructure Delivery Plan provided commentary on the impact of the proposed growth on the transport network as identified by WHaSH BL. The assessment is split down on an area basis as set out in 5.97. Within the IDP the delivery schedule of the key mitigations is outlined in Appendix 1.

When cross referencing the list of mitigations identified in Appendix 1 with Table 5.4 there appears to be a number of omissions in the Appendix.

Table 5.4 lists 20 key junctions where there are traffic delay issues. These correspond with the junctions identified in the AECOM Local Transport Plan Modelling Report Table 5.1. The AECOM report explains for each of the identified locations a mitigation proposal which is tested within the model to establish whether it addresses the issues and does not create problems elsewhere. It is assumed therefore that each of the locations identified and the mitigations proposed are required to facilitate the growth. Accordingly the County Council would expect to see all mitigations listed in the AECOM work being identified in the IDP delivery schedule

in Appendix 1. Without the mitigations identified in the modelling it is unclear whether the growth can be accommodated.

The mitigation schemes contained within the IDP are a mix of schemes lifted from the UTPs and set out in AECOM Local Transport Plan Modelling Report. Whilst remaining relevant, these do not deal with all the congestion issues identified by the WHaSH BL or COMET model and which are in part a consequence of the growth proposed within the Local Plan.

***Outstanding issues from WHaSH BL and new intelligence from COMET (November 2016)***

As indicated above, there are some outstanding issues that have not been explored/resolved by the WHaSH BL model. In addition the new COMET November 2016 runs provide:

- additional intelligence to add to the collective knowledge from WHaSH BL.
- a means of properly assessing the cumulative impact of growth, including those areas outside the WHaSH BL model area.

The main implications of both of these issues are as follows:

*Hitchin*

Based on the WHaSH BL modelling the IDP recognises that a number of junction improvement schemes on the A505 and A602 and B656 will be required by 2031. These highway schemes were generally identified in the Hitchin Urban Transport Plan as being relatively quick win capacity improvement schemes which could be implemented within existing highway boundaries and were therefore seen as being deliverable. In principal schemes have been identified to mitigate these problem junctions as set out in AECOM Local Transport Plan Modelling Report at Table 5.1, together with indicative scheme proforma's for some locations at Appendix C. This report is part of the supporting evidence for the Plan. These have been reviewed and carried forward in the more recent Local Plan modelling work. There are existing problems at these junctions (as identified in the UTP) and a need to increase capacity even without full Local Plan growth coming forward.

The WHaSH BL model shows that the proposed junction improvements certainly reduce delay (in most cases back towards current day levels).

- The 2031 reference case is based on background growth – ie without Local Plan growth and generally shows worsening conditions compared with the base.
- The 2031 Do Minimum adds in the Local Plan growth and generally shows significant delay at a number of the locations.
- The 2031 Do Something shows the impact of adding in the identified mitigation measures (with Local Plan growth). Compared with the Do minimum delays are reduced at schemes HM7 (Woolgrove Road /

Cambridge Road and HM8 Pirton Road / Upper Tilehouse Street) so these can be seen as being successful mitigation measures.

- Scheme HM9 (Cadwell Lane / Wilbury Way) and Scheme HM10 (Upper Tilehouse Street/ A602 /Paynes Park) however continue to show long delays. Although they do provide some relief compared to the Do Minimum, conditions are forecast to be worse than would happen without local plan growth.

COMET confirms the issues identified by the WHaSH BL model and also shows congestion on the A600 Bedford Road, particularly on the southbound approach to the junction with Turnpike Lane in Ickleford.

There remain concerns that growth beyond North Hertfordshire (particularly to the west) is not fully accounted for in COMET and this might have implications for North Hertfordshire, particularly Hitchin (see below '*Luton and Central Bedfordshire Growth and Highways Schemes*').

At this stage there are relatively long term solutions to some problem junctions within Hitchin, but none for others, which will be subject to considerable future congestion. In addition to this we do not have a clear picture of the pressures coming from the substantive growth agenda/potential major road schemes coming forward or in association with the Luton Dunstable Houghton Regis conurbation.

### *Baldock*

The proposed developments in Baldock facilitate some key infrastructure, namely a new road associated with scheme BA1 linking A507 and A505 (with bridge across railway line) and also a southern link road to enable development of schemes BA3 and BA4.

From the most recent COMET run, whilst the new link road associated with BA1 helps to alleviate the Station Road/Clothall Road/Royston Road junction, which is an identified pinch point on the network, this piece of infrastructure also has the potential to lead to the creation of a rat run for strategic traffic seeking to avoid delays on the A1(M). In the COMET modelling this is manifesting in increased capacity pressures on the A505 along the Baldock Bypass on the approach to Junction 9 of the A1(M).

There is clearly a significant opportunity to manage growth at the settlement in a manner which can help address transportation issues in the town. However, the operation and design of the link road will be key to ensure it does not facilitate the strategic re-routing of traffic from the A1(M).

### *Letchworth*

COMET is showing capacity issues on the A505 through Letchworth with the Letchworth Gate/A505 /Pixmore Ave junction which are not picked up in WHaSH BL and for which no mitigation measures have yet been explored.

## *A1(M) Junction 8*

Of particular concern is the impact around A1(M) Junction 8. This is an area where there is particular concern in terms of cumulative impact not being reflected due to the approach being taken in the WHaSH BL modelling runs by North Herts DC and Stevenage BC. The COMET run has provided a means of properly assessing the cumulative impact in this area.

Whilst it is acknowledged that the WhaSH BL model run undertaken for North Herts has identified Junction 8 as requiring mitigation, initial outputs from COMET suggest that the impact is being underestimated. In addition and importantly, what COMET appears to be showing is that there is considerable rat running along local roads to avoid the junction.

For traffic travelling towards Junctions 8 from the west COMET is showing, as does WHaSH BL, significant traffic travelling through Great Wymondley and either choosing to continue along Graveley Lane into Graveley, or turning onto Arch Road through Little Wymondley through Titmore Green into Stevenage on Fishers Green Road. Significant increases in traffic during the peak period are forecasted through Titmore Green, for example, and yet this is not currently identified as a concern.

The junction in Great Wymondley (Hitchin Road/Arch Road) is identified in the IDP, however the suggested mitigation is to change the priority of the junction to address the issue. The concern is that this proposal seeks to address the manifestation of the problem, but little consideration is given to why this issue is occurring – and this appears to be strongly linked with traffic rat running to avoid Junction 8. The proposed mitigation will improve throughput of traffic through Great Wymondley, thus addressing a congestion point, but in real terms it is facilitating a rat run.

Further work is necessary, possibly in the form of link select analysis, to better understand where people are travelling from and to along the A602 corridor (including parallel local routes) so that a holistic approach can be taken for all those routes. More importantly, indications are that the full impact of growth on Junction 8 is not being fully reflected with a lot of traffic re-routing to avoid the junction. Improvements over and above those identified in the IDP appear to be required in conjunction with measures to limit rat running on less appropriate routes.

## *Royston*

The evidence and proposed mitigations for Royston area are limited as the WHaSH BL model does not cover the area. Paragraph 5.112 of the IDP recognises this limitation and sets out the requirement for additional traffic modelling to be undertaken using COMET, extending the WHaSH BL model or some other form of bespoke model to determine whether mitigation works should be pursued at key junctions within and around the town.

The paragraph goes on to state '*... if so these will be included in the infrastructure delivery schedule in a later iteration...*'. However, with the availability of the latest November outputs from COMET we are already able to establish that the A505, A1198 and A10 feeding it are forecast to be at capacity by 2031, with long junction

delays forecast on Old North Road in the town. There is a demonstrable requirement for mitigation measures which at this stage have not been explored to establish whether any would be viable.

### *Graveley/Knebworth*

In addition to the above there are also concerns in some of the villages. Graveley, for example, is likely to experience some of the impact of rat running to avoid Junction 8 and also traffic using the B197 rather than joining the A1(M) at Junction 9. This will potentially lead to a significant increase in traffic through Graveley during peak periods.

Also of concern is the impact of the proposed growth on Knebworth for which no specific mitigation is identified. The B197 Station Road/Watton Road junction and approaches, particularly through the constrained section past the shops, is a known existing pinch-point especially when there are delays or incidents on the A1(M).

COMET suggests that Knebworth should benefit from the Smart Motorway improvements to the A1M, which leads to traffic that was previously avoiding the A1(M) because of delay re-routing back to the motorway. However, the limitations of modelling being able to reflect some of the conditions in Knebworth, especially along the section of the B197 past the shops (which is effectively give and take during peak times where the carriageway is narrowed due to its geometry and parking). This impact is likely being underplayed in the modelling and as such it is felt that this location will need to be looked at in terms of mitigation.

### *Luton and Central Bedfordshire Growth and Highways Schemes*

For some years the County Council has made representations on emerging local plans (and made submissions to examinations) for Luton and Central Bedfordshire (and historically into the joint planning strategy for the conurbation previously progressed by the Luton/South/Central Beds Joint Committee). These representations/submissions have largely related to the need to assess the implications of the substantive scale of growth proposed for the LDHR conurbation and potential new road schemes proposed on the strategic highway/Hertfordshire highway network. The County Council's recent submission to the Luton Local Plan Examination is attached by way of example.

The County Council's COMET model does not identify any substantive impact arising from growth from the west, but the model is based on high level assumptions of the scale of growth likely to come forward (TEMPRO) and limited account of historically desirable (to LBC/CBC) strategic highways schemes that but could well surface as local plans progress (particularly through the CBC Local Plan).

As a consequence, to the County Council's knowledge there still does not exist a common understanding of the likely collective implications of the emerging growth strategies/highway schemes for the LDHR conurbation and the wider sub-region (including North Hertfordshire district). In terms of the implications of this on the NHDC Local Plan, it is the lack of reasonable certainty of the implications of growth from the west on the A505 and the extent to which it exacerbates issues that exist

and are projected to worsen at Hitchin and indeed further eastwards towards the A1(M) and along the A505 to Baldock/Letchworth. This strategic uncertainty is due in large part to the fact that the programming for relevant local plans has not been coordinated and that cooperation has perhaps not been as effective as it could have been.

### ***Moving forward***

Because of the issues identified above, the County Council has concerns about the extent to which the North Herts Local Plan will be considered to be sound at any examination. To move these issues forward the County Council would recommend in the first instance a meeting be arranged, as a matter of some urgency, between North Hertfordshire District Council, Stevenage Borough Council, Highways England, the County Council and potentially also Luton Borough Council and Central Bedfordshire Council. Given that a number of the issues are strategic, cross-boundary (including multiple boundaries) and likely to be on-going, the parties should consider whether cooperation arrangements should move to a more formalised format – at both officer and member level.

### **Minerals and Waste**

Please find attached forms relating to soundness issues identified in relation to minerals resource blocks and rail aggregate depot buffers and integration of waste management facilities in masterplans.

### **Historic Environment**

**Section 2 ‘A Picture of North Hertfordshire’** - should include the historic environment and recognise that this includes historic parks and gardens, historic landscapes, below ground archaeological remains as well as historic buildings, as per the definition of the historic environment in the NPPF.

**Section 4 Strategic Policies Paragraph 4.169** - to avoid possible misunderstandings with the interpretation of data, this paragraph should note that the Historic Environment Record is a dynamic data set which is constantly being updated rather than saying it is done so on an annual basis.

**Policy SP14: Site BA1 – North of Baldock** - advice to NHDC dated 6/2/15 notes that this proposed allocated site could contain heritage assets which may be a constraint on development and therefore in accordance with NPPF paragraphs 128, 135, 139 an archaeological assessment should be produced before it is allocated. No such assessments have been submitted yet. Neither the policy nor the accompanying text refers to this.

**Policy HE4: Archaeology** - this should include provision for the identification and conservation of as yet unknown heritage assets with archaeological interest. This includes sites where there is a potential for such assets but where they are not

currently known, as per NPPF paragraph 128 and Historic England Good Practice Advice paragraph 16.

## **Ecology**

The key Natural Environment Policies are considered below:

### ***SP1: Sustainable development in North Hertfordshire***

In respect of the environmental component, NPPF states (7): *There are three dimensions to sustainable development: economic, social and environmental...an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

The County Council considers that the aims of NPPF regarding Sustainable Development – as reflected above but throughout the NPPF - are broadly consistent with the SD aspirations of SP1, although this could be far better and more simply expressed with respect to the key drivers. However, given it is clear that North Herts support the principles of Sustainable Development, the policy is broadly sound.

### ***Policy SP5: Countryside and Green Belt***

This policy includes: *We support the principles of the Green Belt and recognise the intrinsic value of the countryside. Green Belt and Rural Areas beyond the Green Belt are shown on the Proposals Map.*

NPPF (17) includes the statement that core planning principles should *take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside.*

Many components of an attractive and functioning countryside are also important for biodiversity, including valuable sites, habitats as well as the means of managing them. The policy is considered sound.

### ***Policy SP12: Green Infrastructure, biodiversity and Landscape***

The Plan has been prepared with the best available information provided to it on biodiversity resources, given the advice and information provided by statutory consultees. Whilst this can never be comprehensive for every site or resource, in this respect the Plan has been positively prepared and justified, notwithstanding objections that may still be raised in certain situations following due process.

SP12 outlines the intention to accommodate growth whilst ensuring the natural environment is protected and enhanced. It also states that Green Infrastructure [which can include biodiversity resources] will be protected, enhanced, managed and



created. Both are consistent with the aims set out within the NPPF (109) and (114) respectively.

SP12 states that biodiversity networks will be protected, enhanced, managed and opportunities sought for net gains. Whilst there is uncertainty in relation to how the management or enhancements of such resources will work in practice through the planning process, this approach is consistent with the aims outlined within NPPF (114 and 117).

It is disappointing that NPPF core planning principle *Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework* is not expressed. This is also reflected within 110, 113 and 117 of the NPPF. Neither is there any reference to a mitigation hierarchy as expressed in 118.

These are key principles of planning in respect of biodiversity and are not expressed or reflected adequately in SP12. In this respect HCC do not consider the policy is consistent with NPPF and there potentially renders Policy SP12 not sound.

### ***Policy NE2: Green Infrastructure***

Where Green Infrastructure (GI) includes biodiversity – the above policy would appear to be consistent with the aims of NPPF (114). In this respect the policy is considered sound.

### ***Policy NE3: The Chilterns Area of Outstanding Natural Beauty (AONB)***

This refers directly to biodiversity and AONBs, recognising the importance placed on the conservation of wildlife as expressed within NPPF (115). In this respect the policy is considered sound.

### ***Policy NE5: New and improved public space and biodiversity***

The aims of this policy are consistent with the aims of NPPF (109, 114, 117 and 118). In this respect the policy is considered sound.

### ***Policy NE6: designated biodiversity and geological sites***

The approach addresses the issues otherwise missing in SP12, referring to the approach to site hierarchy as well as mitigation hierarchy, as reflected in NPPF and as outlined above for SP12. Consequently, in this respect this policy is consistent with the aims of NPPF.

The term 'National Planning Policy Framework sites', is not referenced within the NPPF. However, the NPPF does refer to *wildlife corridors and stepping stones that connect them [the designated sites] and areas identified by local partnerships for habitat restoration or creation* (117). If this is what is meant, this should be stated and should come at the bottom of the hierarchy.

In this respect, whilst the policy is broadly sound, it should be amended to reflect what is stated in NPPF to avoid ambiguity.

On balance, with respect to biodiversity the policies as outlined within the North Herts Local Plan above are largely consistent with the aims outlined within the NPPF.

Amendments to policies as outlined above would ensure that the Plan is sound and consistent with national policy on biodiversity.

The supporting text expectation is that the Biodiversity Offsetting Calculator, or its successor, should be used to determine ecological value. There are various issues and concerns regarding the use of this approach including its application, interpretation of its results and the delivery of no net loss/net gain within the District, given the lack of available land or management support. For information, the Defra metric is not considered by Natural England to be an 'industry standard' (NATURAL ENGLAND, 2016, Review of the High Speed 2 No Net Loss in Biodiversity Metric). However, the application of policies should ensure that approaches to these issues can be dealt with accordingly to ensure there is no net loss to biodiversity and that enhancements should be sought.

Please do not hesitate to contact me in the first instance should you wish to follow up any of these matters and I will liaise with colleagues accordingly.

Yours sincerely,

Paul Donovan  
**Environment Department**  
**Hertfordshire County Council**

## **HERTFORDSHIRE COUNTY COUNCIL SUBMISSION TO LUTON LOCAL PLAN EXAMINATION**

**4. Has the cooperation maximised the effectiveness of the preparation of the Local Plan? In respect of relevant 'strategic matters' is there evidence to demonstrate that the engagement with relevant authorities and bodies in the process of preparing the Local Plan has been:**

- constructive,**
- active and**
- ongoing?**

**a) Has every effort been made to secure the necessary cooperation on the strategic matters listed above?**

There has been limited active and ongoing cooperation on ways to address the transport concerns of the County Council.

The situation at Luton and its wider hinterland is not dissimilar to that at Harlow, over the border to the eastern edge of Hertfordshire – another administrative boundary-restricted authority. In that case the four core authorities (East Hertfordshire, Epping Forest, Harlow, and Uttlesford) have joined (with the two County Council's – Essex and Hertfordshire – as transportation authorities) politically into a 'Co-operation for Sustainable Development Member Board', supported by similar collective arrangements at officer level, and are jointly developing a growth and spatial strategy for the sub-region. They are planning four separate but coordinated Local Plan public consultations later in 2016. This process is informed by consistent transportation modelling for the sub-region to, amongst other matters, identify local and strategic impacts on the local and strategic network, mitigation measures necessary, mechanisms for delivery, responsible agencies, funding opportunities, etc. There are multiple Memoranda of Understanding, including transport (involving all responsible highways agencies).

The 'Next Steps' identified at a meeting of Luton Borough Council (LBC)/Hertfordshire County Council (HCC) 3<sup>rd</sup> December 2015 (DTC 001b – page 120) have not progressed perhaps as far as anticipated – to the extent that HCC's principle concerns remain [however, see response to Hearing 1 question 4, d)].

A meeting was held on 21<sup>st</sup> June 2016 between LBC and HCC (with Highways England in attendance) to clarify the extent to which the highways technical work undertaken by LBC to support its submitted Local Plan, including that published immediately prior to its submission, has addressed the concerns of HCC.

The current position on the most relevant concerns to HCC are as follows.

**i. The extent to which transport modelling underpinning the Plan has assessed the potential impact upon the Hertfordshire network.**

LBC has provided outputs [Luton Local Plan - 2015 Pre-submission transport evidence - April 2016 (TRA001A)] from the Central Beds & Luton Transport Model (CBLTM), indicating increases in traffic volumes in 2031 Local Plan Option C

(Alternative) minus Option A ('Reference Case' i.e. committed development only). This provides a broad indication of the amount of additional traffic which could be experienced on Hertfordshire's road network but does not give an indication of link stress or junction impact.

The plots broadly cover the area of countryside between Luton, Stevenage and Hitchin within North Hertfordshire district, but not at and eastward of Hitchin or the area within St Albans City and District and Dacorum Borough to the south of Luton and Central Bedfordshire (including the A1081 and B653 Lower Luton Road corridors leading to/from Harpenden and Batford, but potentially also the A5/A5183 to/from Redbourn and St Albans and other routes). The CBLTM simulation network does extend into parts of these areas, however the model is not detailed and is therefore unlikely to provide sufficiently detailed results.

LBC consider HCC's concerns not to be substantively relevant to the current Local Plan but to the growth of the wider conurbation. It considers that assessing the impact of the Local Plan outside of the borough should not be seen as a function solely of LBC or the Luton Local Plan since HCC is the highway authority for the territory concerned.

In any event, the CBLTM is not the right tool to assess development impact on the wider Hertfordshire network, as that network is:

- a) outside the core modelled area & network structure is less detailed
- b) outside the area of the synthesized network

HCC has developed a countywide strategic transport model (COMET) which extends as far as Luton. However, there is currently no COMET run that illustrates the impact of the scale of growth proposed within the Luton Local Plan or the wider growth implied within TRA001A and the assumed highway infrastructure also differs.

## **ii. Clarification on the status and nature of the Luton North Bypass A6-A505 link and East Luton Circular Road (A6-A505 Link)**

The County Council has raised concerns on the lack of clarity with regard to the nature and status of the Luton Northern Bypass A6-A505 link section.

### ***Luton North Bypass***

The 2009 consultation on transport proposals for North Dunstable and North Luton included a Luton Northern Bypass, stretching from the M1 across to the A505 via the A6.

## Consultation proposals - North Luton

### Luton Northern Bypass Options

Proposals for a northern bypass of Luton are illustrated on the plan opposite. This route would commence at a new Junction 11A on the M1, built to accommodate the A5 - M1 Link. It would then link with the A6 following one of the 4 alternative alignments illustrated opposite by the respective green, orange, grey and blue routes.

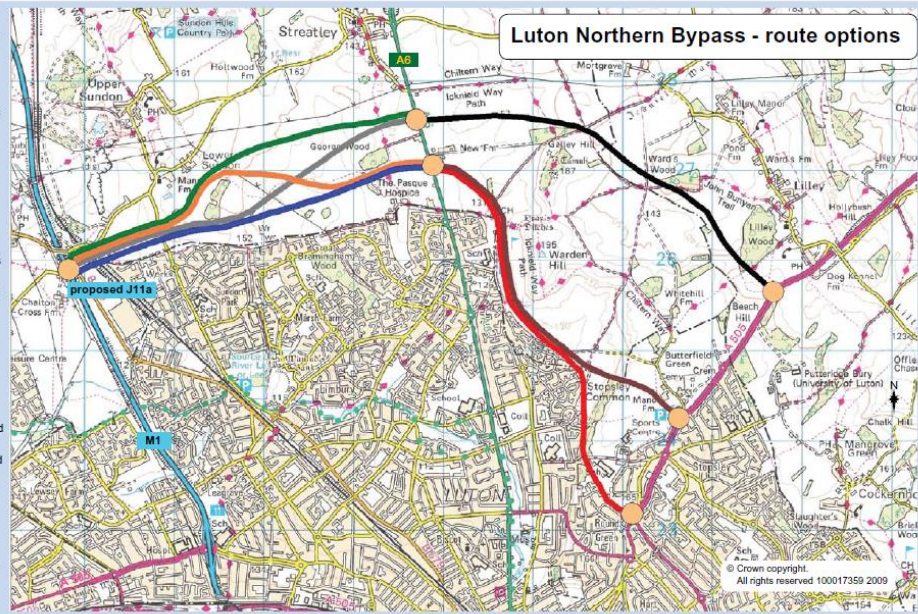
The route would then continue from the A6 to the A505 following one of 3 alternative alignments, illustrated opposite by the respective black, brown and red routes.

### Alternatives to Luton Northern Bypass

It may be possible to tackle many of Luton's travel and congestion problems in a different way, without major new road construction. This would avoid the considerable environmental effects of the bypass and could improve travel opportunities for many more groups of people in the community.

At this stage we have not developed firm proposals for this option. They would probably comprise a combination of improved bus services, cycle and pedestrian routes and traffic calming together with personalised travel planning. These measures would help people to make the switch from car to other modes of transport.

If this option receives sufficient support at this Consultation, we would develop a package of measures for further consultation in the future.



The Central Bedfordshire Local Transport Plan supports the provision of a Luton Northern Bypass:

## Luton Northern Bypass

Between the M1 and A6 and North of Luton lies the North Luton Strategic Site Specific Allocation which is identified in the Core Strategy as having the capacity for approximately 1,800 private and affordable homes. The Masterplan for the area has not yet been developed and it will provide greater guidance about the scale and location of the infrastructure requirements but one of the key transport links in the area will be the Luton Northern Bypass (M1 to A6) which will link into Junction 11A of the M1 and thus into the A5-M1 link (Dunstable Northern Bypass).

The scheme between the M1 and A6 is wholly within Central Bedfordshire and we shall be fully involved in the development of the Masterplan for the area. This scheme will be constructed as part of the planned development north of Luton.

In March 2009 the results of public and stakeholder consultation were presented to the Joint committee. As a result the committee resolved to support an outer bypass subject to the outcome of further more detailed work.

East of the A6 proposals for a link through to the A505 are for the longer term (post 2026).

The Luton Local Transport Plan (TRA 003) supports the provision of a Luton Northern Bypass:

### Luton Northern Bypass

Public consultation on alternative routes for Luton Northern Bypass was presented at a public and stakeholder consultation in early 2009. The results of that consultation were reported to the Joint Committee that March, and the Committee resolved to support proposals for an outer bypass subject to the outcome of further more detailed work. A full northern bypass of Luton between the M1 and the A505 Hitchin Road will remove through traffic both from roads within Luton Dunstable and Houghton Regis and also from unsuitable minor roads outside the conurbation.

The section between the M1 north of Luton and the A6 Barton Road will be designed as part of the master-planning for the North Luton SSSA which is identified in the Luton and southern Central Bedfordshire Core Strategy and will be constructed as part of that planned development. East of the A6, proposals are for a link through to the A505 Hitchin Road. Whilst the preference of the Joint Committee was for an outer route, work is currently ongoing to develop a design that addresses the environmental sensitivity of any routes in this area. Luton and Central Bedfordshire Councils will continue to progress proposals for the A6-A505 section in timescales consistent with the provision of the M1 to A6 section of the bypass as part of the North Luton SSSA.

Luton Local Plan - 2015 Pre-submission transport evidence - April 2016 (TRA001A) Table 4 lists the schemes that are included in modelling work supporting the Local Plan, and include:

**Table 4: Transport Infrastructure Schemes**

Area	Scheme	2016	2016	2021	2021	2031	2031
		Option A	Option A (Alternative)	Option B	Option C	Option B	Option C and C (Alternative)
	Luton North Bypass*			x	✓	x	✓

\* Luton North Bypass is in addition to the distributor road for the North of Luton Development

The Infrastructure Delivery Plan (IDP) (DEL 004) states the following:

*'Non-critical items include the M1-A6 and A6-A505 link roads, which lie outside the borough and will be planned by neighbouring authorities: Central Bedfordshire and North Hertfordshire district councils. While these routes will have significant impacts on transport-related concerns across Luton, they are not critical to the delivery of any of Luton's strategic allocations'*

Details	Delivery Year	Ward(s)	Lead Provider(s)	Cost	Funding Secured	Funding Deficit
Luton Northern Bypass: M1 to A6	2014-2026	N/A	CBC	£100,000,000	£100,000,000 (developer and local growth fund)	£0
Luton Northern Bypass: A6 to A505	2014-2026	N/A	CBC/ NHDC	Unknown	Unknown	Unknown

LBC has confirmed that reference is to the Luton Northern Bypass in Table 4 of TRA001A relates just to the M1-A6 section (plus the HE's A5-M1 link and Central Bedfordshire Council's Woodside link, both of which open in Spring 2017).

Given that the IDP reference to Luton Northern Bypass: A6 to A505 refers to North Hertfordshire District Council as a delivery agency, it is assumed this is a northern outer bypass proposal (confirmation has been sought from LBC, but not received as of 24<sup>th</sup> June 2016).

## ***East Luton Circular Road (A6-A505 Link)***

Local Plan Policy (SUB 001) LP31 makes reference to an 'East Luton Circular Road':

*'Policy LP31 (pages 89-90) Part E*

*Improvements Needed and Safeguarded Land*

*"The following strategic infrastructure schemes are needed to support proposed development and land is safeguarded for this purpose where needed..."*

*East Luton Circular Road  
(North including the Weybourne Link)'*

The Policies Map (SUB 0002a) which accompanies the Local Plan indicates a safeguarded alignment, part of which falls within Luton Borough and (although not shown) part within Central Bedfordshire. The alignment runs close to the existing urban edge and would presumably link the A6 to the north of the town (within Central Bedfordshire) with the A505 at the Stopsley Way-Vauxhall Way-Hitchin Road (within Luton). The alignment has been safeguarded for some years.

The scheme is needed to deliver the Local Plan development. However, it is understood that the CBLTM-based modelling transport evidence base presented by LBC does not however include any testing of an A6-A505 scheme. The policy's assertion that the scheme is needed is therefore not justified by evidence. It is understood that LBC may have undertaken a sensitivity test to determine the impact of an A6-A505 link road, but these results have not been made available as part of the Local Plan evidence base. It is also understood that this test was seen to reduce flows in particular on Barton Road/Old Bedford Road and also Stockingstone Road.

The following text has been added under the Local Plan's Schedule of Minor Modifications to the Pre-Submission Consultation Version (document ref. SUB 001a):

*'11.2A The East Luton Circular Road (north) route is safeguarded as a long term option that might be required to support future development. Running between Stopsley and the A6, including a link to Barton Road along the line of Weybourne Drive, it would allow the introduction of traffic calming measures to certain routes. Some traffic would be diverted away from the town centre while access to the airport and key employment areas to the east of the town would be improved. The road would affect nationally important landscape and biodiversity designations and its development would be subject to the criteria set out in LP 28 and 29.'*

The wording of 11.2A states that an alignment (in so far as land within Luton's boundary is concerned) has been safeguarded that *might* be needed in the future, and as such is contradictory to Policy LP31. Clarification is required as to whether this scheme is or is not required to support the growth within this current Local Plan

and also the likely collective growth of the conurbation. Either way, evidence relating to the impacts of the scheme is almost certainly required to inform this process (but including consideration of the wider strategic impacts, not just those within Luton).

HCC's principle concern is that the impact of an A6-A505 link road on the Hertfordshire road network, be it an inner or an outer alignment (LBC considered there to be a strong preference for an outer route in late 2015 – DTC001b – page 119), is unknown - for example, in terms of facilitating a new attractive strategic cross-country w-e route towards Hitchin, Stevenage and the A1(M) and impacting upon congestion in Hitchin ((DTC001b, page 119).

LBC takes the view that this issue is more critical in relation to future developments that might be considered, possibly through the Joint Growth Options Study (due to report at the end of October 2016), rather than the scale of development currently envisaged either within Luton or NHDC East of Luton. LBC has indicated that HCC will be involved as part of a wider Reference Group.

The provision of a A6-A505 link is not included as 'included infrastructure' in HCC's COMET and therefore does not assess its implications.

### **iii. What is the nature/status of the A505-Airport Bypass/Airport Link to Century Park**

Century Park would be connected to the wider road network via a link road through the airport site rather than a link onto Eaton Green Road. This is shown indicatively on the Local Plan Proposals Map by a large red arrow. This access would in effect be a cul-de-sac with no direct means of access onto Eaton Green Road for private vehicles.

Eaton Green Road runs along the northern edge of the airport site and serves as an edge of town local distributor road mainly for residential areas, but leads directly into the Hertfordshire countryside.

A potential concern from HCC's perspective is that if access were to be provided directly onto Eaton Green Road it could form an attractive through route for traffic bypassing Luton, and this could in turn have more strategic implications on Hertfordshire's roads (linking the M1 and A505 towards Hitchin and the network beyond, in much the same way as the A6-A505 link).

Local Plan (SUB 001) Policy LP6 (pg30-31) (reflecting changes put forward under the Schedule of Minor Modifications) states the following with regard to Century Park access:

- (i) Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percival Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency...*

HCC considers this wording to be appropriate.



Option C of the CBLTM evidence base presented with the Local Plan has assumed that Century Park is connected to a new link road through the airport site but also onto Eaton Green Road. This is inconsistent with the Local Plan. It includes the East of Luton development within North Hertfordshire.

Option B, which reflects Luton’s growth and excludes East of Luton development, does not assume a connection. This is consistent with the Local Plan.

**Table 4: Transport Infrastructure Schemes**

Area	Scheme	2016	2016	2021	2021	2031	2031
		Option A	Option A (Alternative)	Option B	Option C	Option B	Option C and C (Alternative)
Luton Proposed	Dunstable Road Pinch Points			✓	✓	✓	✓
	Airport Link to Century Park			✓	✓	✓	✓
	Dualling of Airport Access Road			✓	✓	✓	✓
	A505 - Airport Bypass					✓	✓
	Airport Junction Mitigation			✓	✓	✓	✓
	Luton Airport Parkway Bus-Loop					×	×

[extract Table 4, TRA001A]

Outputs from the CBLTM evidence base show changes in traffic volumes between a 2031 ‘reference case’ and 2031 ‘Option C’ (Alternative) Local Plan scenario – i.e. containing the connection onto Easton Green Road. Increases in traffic on Eaton Green Road are shown resulting from Century Park, leading to/from Hitchin via the villages of Preston and St Ippolyts. It is not possible to determine whether or not increases of the magnitude shown would be material, although from the County Council’s perspective, any notable increases in traffic on what is a dense patchwork of narrow country lanes running between Luton, Hitchin and Stevenage could be a concern in terms of capacity, noise and safety.

LBC reports that NHDC has responded to the Local Plan expressing the desirability to make employment at London Luton Airport and Century Park easily accessible to residents of the East Luton Urban Extension which is being considered by NHDC.

A through route could attract more strategic re-routing on Hertfordshire’s roads. The attractiveness of any such through route could depend on whether an eastern bypass link to the A505 is proposed. This has been tested alongside 2,100 and 5,500 dwellings as part of the East Luton urban extension.

The provision of such a through route is not included as ‘included infrastructure’ in HCC’s COMET and therefore does not assess its implications.

LBC takes the view that this issue is more critical in relation to future developments that might be considered, possibly through the Joint Growth Options Study (due to report at the end of October 2016), rather than the scale of development currently envisaged either within Luton or NHDC East of Luton.

**b) Has consideration been given to consulting on, preparing, entering into and publishing agreements on approaches to the preparation of the Local Plan? If so, with what result? Have any formal agreements between authorities, been**

**signed by elected members, demonstrating a long term commitment to jointly agreed strategy on cross-border matters?**

There has been no published agreement between the two authorities on the approach to be taken on strategic highways/transportation issues during the preparation of the Plan. There is no long term commitment to a jointly agreed strategy on cross-border transportation matters.

**c) What joint work, including with Central Bedfordshire Council and North Hertfordshire District Council, has been completed, is underway or is planned?**

There has been limited joint work addressing the concerns of HCC. The context provided in response to Hearing question 4. a) summarises the current position. LBC consider HCC's concerns not to be substantively relevant to the current Local Plan but to the growth of the wider conurbation.

**d) Has the cooperation undertaken produced effective policies on each of the strategic matters listed above? Has sustained joint working led to concrete actions and outcomes on any strategic matters? Are there draft or completed Statements of Common Ground or Memoranda of Understanding on any of these matters?**

There has been no sustained joint working leading to agreed actions and outcomes on strategic transportation matters. At the meeting of 21<sup>st</sup> June 2016 LBC presented an offer of a Statement of Common ground to be entered into by 19<sup>th</sup> July, followed up with an offer of political meeting between the two authorities. It is hoped that that process will help to continue to resolve the outstanding issues identified in response to Hearing 1 question 4. a).