

From: "David Barnard"  
Subject: FW: West of Luton, and East of Luton implications .... NHDC  
Local Plan  
Date: 25 November 2019 at 16:21:20 GMT  
To: <louise@poservices.co.uk>

**Dear Louise,**

**I am aware that the Inspector, Simon Berkeley, is not officially receiving correspondence on the NHDC proposed Local Plan. However, the changing scene compels me to write. The proposals to massively increase the activity and size of Luton Airport, the commercial/light industrial sites adjacent, and the total lack of roads infrastructure into North Herts. ridicules any proposals to build 2100 houses there too! The unmet need attributed to North Herts. can easily be accommodated to the West of Luton, on sites that have been tested professionally, and provide infrastructure and services way beyond that proposed to the east, in North Herts. Thank you, in anticipation of Mr. Berkeley's attention.**

**David Barnard  
Councillor NHDC  
Councillor Herts County Council**

Please receive the collated evidence, which convincingly confirms the the West of Luton presents a sustainable and superior option to assist with Luton's alleged unmet housing need.

Further compelling reasons include the recently published intentions for Luton Airport to apply to expand up to 32 million passengers per annum, and the developments such as Century Park and Bartlett Square, etc.

Thank you,  
Councillor David Barnard NHDC,...Herts CC

I write to you in relation to the East of Luton proposal which I now understand has been queried by the Inspectors perusing the NHDC Plan and the Central Bedfordshire Council (CBC) Plan.

My comments have the insight of attending years of Plan hearings (NHDC and CBC/ Luton BC) as an observer and representative of our

authority, with the added benefit of working closely with John Ironside who had a wealth of experience in planning and I am aware scrutinised and commented on not only the East of Luton, but also the West of Luton which both Peter Lilley, I and others were repeatedly briefed upon.

I understand your previous colleague at Stevenage, Caroline Danby is now prominent within the planning policy team at CBC which I hope proves positive for NHDC but I would urge extreme caution in any unsubstantiated comments you receive because:

- Luton and CBC disagree on the CBC Plan and have previously gone to judicial review which should be anticipated will happen again.
- Statutory bodies and community groups (including NHDC) have previously made numerous comments on various options for growth in the Luton Housing Market Area. (HMA)
- NHDC PLanning previously carried out a forensic analysis of the various options of Luton's HMA and engaged in several meetings with the promoters of the West of Luton (WOL).

With the above in mind it is imperative that any comment made by Officers or Members of NHDC is factually correct. The main thrust of this letter is for our officers (and Members) to be aware of valid points that will avoid any possible dereliction of duty in the foreseeable future. On behalf of my constituents I have continued to pay close attention to all representations in our area and wish to highlight the following points from the CBC Reg 19 stage. What is important to my Ward is:

- (i) Luton BC has continued to support an allocation to the WOL which CBC continues to oppose
- (ii) CBC continues to support the North of Luton (NOL) whilst Luton BC casts doubt on its credentials
- (iii) CBC and Luton BC appear to both support the East of Luton (EOL).

My comments that I formally wish to highlight are:

1. NHDC Planning was given complete access to the technical information provided by J.B Planning acting for the WOL promoters, and I subsequently heard John supporting the credentials of the WOL.

2. The WOL and EOL were both subjected to transport modelling by Halcrow with the former obtaining better results than the later.

3. CBC have consistently maintained that the WOL has difficulty on five key issues:

(i) Transport with emphasis on the WOL problems accessing the guided busway which is farcical because it is already in place and immediately accessible- please see attached picture!

(ii) Negative impact on the expansion of the airport which appears to be a major error of judgement because it was made clear to John Ironside that the WOLs consultants are Bickerdike Allen who also act for Luton Airport - the Reg 19 reps confirm that this aviation consultant company has been retained and state, "The finding in relation to aircraft noise remains therefore that when taking account of how future operations will develop towards full usage of the single runway at Luton Airport, noise from aircraft from London Luton Airport will not materially constrain residential development within the Luton West area." Compare this to CBCs comments contained within Central Bedfordshire's Strategic Housing Land Availability Assessment dated April 2018 which purports that this land is "Not an appropriate location for development due to aircraft noise associated with Luton Airport." and you will appreciate that CBCs argument is not credible. It is also of note that when the airport produced its white paper with masterplan and extra runways, they included the WOL as a preferred area for airport related uses, whereas the EOL was discussed as a potential problem to onsite accessibility for future passengers!

(iii) The WOLs coalescence with Woodside- compare this to the EOLs impact on Cockernhoe and Mangrove Green and clearly the EOL is a much more intrusive proposal in this regard.

(iv) Green belt study- the CPRE conducted a comparable analysis between the WOL and the EOL and subsequently made a written statement in favour of the West. The WOL lies wholly outside of the AONB that provides the 'defensible boundary' often sought to protect unrestricted urban sprawl. Alternative options that intrude upon the AONB have been (and presumably will continue to be) a major derogatory factor on CBC Plan because of the proposed North of Luton which must be considered very carefully into the equation. From my

experience on the Chilterns Conservation board the NPPF directive of alternative consideration of proposals outside of the AONB is material and relevant in the current query from the Inspectors and one which NHDC needs to carefully consider.

(v) Deliverability- over the years the EOL has been 'tactful' about what it can and can't deliver as part of its scheme and has undergone major transformation from a 5500 scheme in the Luton and Central Bedfordshire Plan to what it is now. I am extremely concerned about the NOL and how this could impact upon NHDC because years ago it was necessary to cross the railway line at Sundon but this required an agreement with Network Rail who own the land which according to the recent business case presented by CBC is still unresolved! Moreover, Luton BC are continuing to push for a continuation of the M1-A6 link onto the A505 which they consider is necessary infrastructure for the proposal. In contrast I know that the WOL promoters sent an open letter to all the Lib Dem Councillors in Luton inviting them to fully scrutinise their viability reports, and the Growth Option Study (conducted by a number of local authorities including NHDC) that preceded the draft CBC Plan showed the WOL to be a highly deliverable site.

As you can see there is a wealth of material past and present that is relevant to the East of Luton that would cause any inspector to question the site selection process, and it would be utter folly for NHDC to advocate that there are not any credible alternatives to this allocation because there is and always has been. Furthermore, it will be the Inspector who approves the sites in the Plan NOT CBC and so far, this is undetermined. Added complications arise upon reading the CBC Reg 19 statements which reveal a plethora of technical evidence supporting the WOL in comparison to other sites, and I urge you to filter political dogma from diligent planning for NHDC to maintain credibility on its own Plan.

Attached is a copy of the JB Planning Reg 19 response to Matter 4 downloaded from the CBC website. If you haven't done so already, I request you urgently read it because it clearly and concisely substantiates some of the points I have made regarding the West of Luton proposals and obliterates some of CBC's arguments against. I ask you to

acknowledge this correspondence and if you disagree with any point made please notify me immediately with an explanation why?  
The EOL proposal forms part of our Plan and it might be tempting by some to respond in a protective way to the queries presented by Inspectors but NHDC must not make the same errors as CBC has/ is doing which could have dire consequences. There is a real risk to the CBC Plan being found unsound and/or NHDC taking the brunt of unsustainable development due to poor planning- it is crucial that NHDC Representatives read all the information provided and do not make any errors that could be a recipe to allocate more houses in our authority. We all have a responsibility to protect and act in our constituents' best interests and I will continue to monitor the situation to ensure that due diligence is carried out and that statements made by NHDC is considered, professional and factually correct.  
I have copied this correspondence into appropriate parties and await your response.

Herewith evidence for transport and aviation; it can be found on this link. Please download, and scrutinise.

Your response is essential, prior to writing to the Inspector, in response to his letters.

You will see that there has been proper and professional evaluation of the many facets, including transport access, EIA, etc.

Please inform me of your having read, and that you will act accordingly, after stating that you do not believe that the transport ingress into the west site is untested. This is not correct.

<https://centralbedfordshire.app.box.com/s/93kcuppv5fui66sf4pj9ic9lkticwln/file/450704000423>