

Paper C: The proposed 'East of Luton' sites

1. The Inspector has requested that North Hertfordshire District Council (NHDC) provide further information to the Examination regarding the proposed East of Luton sites. In his letter of 9 July 2019 (the Inspector's July letter), the Inspector raises a number of specific questions and queries on this matter. In particular, he has asked for clarity upon:
 - Whose unmet need the allocations are intended to address (see particularly paragraphs 17 and 32(c) of the Inspector's letter);
 - The increase in contribution of the proposed allocation site to Green Belt purposes (paragraph 18);
 - The apparent absence of a specific comparative assessment of spatial options across the Luton Housing Market Area (HMA) (paragraphs 20, 21 and 23);
 - The robustness of the Sustainability Appraisal in this respect (paragraphs 22 and 23); and
 - The Council's intended approach in light of the above, suggesting four possible alternatives (paragraph 25 and associated sub-paragraphs a) to d) (the options))
2. These issues are dealt with in turn below. All references to 'the Plan' or 'the Local Plan' in this response are to the submitted Plan (LP1) as suggested to be altered by the Proposed Main Modifications issued in November 2018 unless otherwise stated. All references to the National Planning Policy Framework (NPPF) are to the 2012 version unless otherwise stated.

Inspector's Query 1 – Whose unmet need?

"...paragraph 39 of the Council's note [ED159] appears to indicate that the East of Luton sites "... would still be required to make a positive contribution towards housing needs from the wider [Luton] housing market area ...". So far as I am aware, the purpose of these sites is in specific relation to the identified unmet needs of Luton Borough, rather than those of the wider Luton HMA. That is, at least, what I have heard at the hearings so far and is what is set out in paragraph 4.9 of the Council's Updated Statement of Common Ground with Luton Borough Council [ED18]. For the avoidance of any doubt, I ask that the Council clarifies the situation here" (paragraph 17 of the Inspector's July Letter)

3. The Council's clear and unambiguous position is, and has always been, that the vast majority of the East of Luton sites are intended to contribute to the identified unmet needs of Luton Borough. This is plainly set out in Policy SP8(b) of the Plan which states that the Council will:

Provide additional land within the Luton HMA for a further 1,950 net new homes as a contribution towards unmet needs for housing arising from Luton (underlining added)

4. This point is repeated at paragraph 4.219 of the Plan, which additionally explains the rationale for the overall allocation for 2,100 homes:

Three adjoining sites are identified to the East of Luton totalling 2,100 dwellings. Around 150 homes will meet requirements arising from within North Hertfordshire, with the remaining 1,950 homes addressing needs that cannot be physically accommodated within Luton. The contribution towards unmet needs from Luton will include the provision of both market and affordable homes... (underlining added)

5. That the unmet need arises from Luton Borough and / or that any future prospective allocation in this location would serve this purpose can further be seen repeatedly and consistently expressed throughout the documents submitted by the Council to the examination. These include (but are not necessarily limited to):

- Memorandum of Understanding with Central Bedfordshire (MOU8, paragraph 5.13);
- Housing and Green Belt Background Paper (HOU1, p.30, paragraph 5.36 & p.32, paragraph 5.50);
- Luton HMA Growth Options Study (HOU7, p.2, paragraph 1.6);
- Luton Local Plan final Inspector's Report (ED4, p.28, paragraph 138);
- Statement of Common Ground with Aylesbury Vale (ED6, p2, paragraph 4.3);
- Updated Statement of Common Ground on the NHDC Local Plan between NHDC and Luton Borough Council (ED18, p.3, paragraph 4.8);
- Statement of Common Ground between NHDC, Bloor Homes and The Crown Estate: Strategic Allocations EL1, EL2 and EL3 (ED28, p.3, paragraph 18);
- Note to the Inspector: Implications of new household projections for the NHDC Local Plan (ED159, p.5, paragraph 25);
- NHDC Matter 1 Statement (paragraphs 14, 16, 17 & 18);
- NHDC Matter 3 Statement (paragraph 55);
- NHDC Matter 5 statement (paragraph 29); and
- NHDC Matter 10 (Luton & Cockernhoe) Statement (paragraphs 17 (final bullet), 30, 38 & 41).

6. That the level of unmet need from Luton Borough stands at 9,300 homes can be seen repeatedly and consistently expressed throughout many of the same documents.
7. All of the above reflect the position on unmet need as expressed in Luton Borough Council's statutory Development Plan. This was adopted on 7 November 2017. Neither Luton's Plan nor any statements it contains on this matter have been subject to any form of challenge. That the unmet need (i) arises from Luton Borough and (ii) stands at 9,300 homes was not subject to dispute at the relevant Examination hearing sessions into the Central Bedfordshire Plan held in May 2019.
8. This unmet need forms part of a 'to find' OAN figure of 23,300 homes across the Luton HMA over the period 2011-2031 once the capacity of Luton Borough (as expressed in

their adopted Plan) is taken into account. This is made up as follows (see HOU7, pp.1-2, paragraph 1.6 and ED18, p.4):

- Unmet needs arising from Luton: 9,300
- That part of Central Bedfordshire within the Luton HMA: 13,400
- That part of North Hertfordshire within the Luton HMA: 200
- That part of Aylesbury Value within the Luton HMA: 400

9. The reference in paragraph 39 of ED159 needs to be read in context. This part of the paper contains a hypothetical exploration of potential alternate scenarios. These scenarios are subject to heavy caveats; Paragraph 11 of ED159 makes clear that “*The indicative figures have not been subject to the same level of technical analysis as the figures supporting the Plan and are for illustrative purposes only*”. Paragraph 20 of ED159 makes clear that “*the Examination will proceed having regard to the 2012 version of the NPPF*” and that any presentation of the potential standard method figures is solely to allow the reader to “*compare with Table 1*”. Paper A contains further information on the role and purpose of ED159.

Inspector’s Query 2 – Increase in contribution to Green Belt

“...Rather than making a moderate contribution to the Green Belt, the Council now considers their contribution to be significant. Consequently, the development of them proposed through the Local Plan would be more harmful than previously considered by the Council to be the case. This is a factor that is relevant to the consideration of whether or not exceptional circumstances exist to warrant the ‘release’ of the Green Belt land involved” (paragraph 18)

10. The general principles relevant to the re-grading of the Green Belt contribution of these sites from moderate to significant are addressed in the separate supplementary ‘Paper B’ on Green Belt. This should be read in conjunction and referred to for additional information.

11. For the purposes of this paper, the Council reiterates the view expressed in that paper and the Green Belt Review Update (GBRU) that all of the strategic-scale urban extensions proposed by the Plan on undeveloped Green Belt land would now be judged as having a significant impact upon its purposes. It would therefore occasion significant harm were it to be released for development. Notwithstanding this point, it is clear that there are exceptional circumstances to justify release of green belt land to meet the unmet needs of Luton.

12. As set out below and in evidence already submitted to the Examination, the *exceptional circumstances* in relation to the proposed East of Luton sites include:

- The existence and scale of an unmet need of 9,300 homes arising from within Luton Borough (as set out in paragraphs 6 to 8 above and in the relevant documents quoted);

- That the above should be recognised as both acute and pressing (as accepted in paragraph 19 of the Inspector’s July letter);
- The imperative under the Duty to Co-operate to work pro-actively to seek solutions to strategic cross-boundary issues (again recognised in paragraph 19 of the Inspector’s July letter) and the ways in which the HMA authorities have co-operated to address this matter (see HOU7 and response to Query 3 below);
- The opportunity to make a meaningful and substantive contribution to that unmet need as well as ensuring that the smaller scale of need arising from within NHDC’s portion of the Luton HMA is met in full within the District;
- The opportunity to make that provision in a manner which:
 - accords with Paragraph 52 of the NPPF (NHDC Matter 10 (Luton & Cockernhoe Statement, paragraph 19));
 - addresses unmet need as close to source as possible (HOU7, p.2, paragraph 1.6 & NHDC Matter 5 statement, paragraph 30 *and consistent with* ORD10,p.31); and
 - provides the opportunity to ‘plug into’ infrastructure (such as sustainable transport networks) of the existing town;
- The absence of any alternatives within that part of the Luton HMA lying with NHDC (HOU1, p.15, paragraph 4.30 *supported by the analysis in* HOU7 and HOU9);
- The absence of sufficient non-Green Belt alternatives in the wider Luton HMA that would allow the unmet need to be addressed in full without resort to Green Belt sites (HOU1, p.16, paragraph 4.35; HOU7 and below);
- The absence of sufficient Green Belt sites that might be considered less harmful in Green Belt terms that would allow the unmet need to be satisfactorily addressed in full without resort to the East of Luton sites (HOU7 and below);
- The scale of need arising in those parts of the Luton HMA in other authority areas, notably Central Bedfordshire (circa 13,400 dwellings), that need to be addressed before they can be considered to be making a ‘net’ contribution to any unmet needs from Luton (HOU1, p.15, paragraph 4.32).
- The *consequent difficulties in achieving sustainable development without impinging on the Green Belt* (as set out in the *Calverton* judgement (ED34, p.18, paragraph 51));
- The making of provision towards those unmet needs in a sustainable location immediately adjoining Luton;
- The absence of other, non-Green Belt constraints that would fundamentally inhibit development in this area (NHDC Matter 10 Luton & Cockernhoe Statement, pp.4-6, paragraphs 21 to 28); and
- The policy requirements set out in Policy SP19 (see particularly criteria c, g, k and l) which seek to ameliorate harms to the fullest possible extent through:
 - the provision of landscape buffering;
 - reinforcement of (new) Green Belt boundaries;
 - use of existing woodland blocks; and

- the provision of lower intensity uses (for example school playing fields) in the more sensitive areas of the site, particularly those visible from the Chilterns AONB.

Inspector's Query 3 – The absence of further comparative assessment

... neither this document nor any other produced to the examination provides a comparative assessment of the numerous option... by which I mean an assessment that analyses the site options and then, through comparison, arrives at recommendations or conclusions founded on a clearly reasoned justification...all comparative analysis is limited to land within North Hertfordshire – that is to say, it is predicated on the Council's decision that North Hertfordshire should set out to provide land to meet Luton's needs.(20)

In different circumstances, that might not be a shortcoming. The problem here, however, is that the land proposed for that purpose is in the Green Belt, and exceptional circumstances must be demonstrated to exist to justify its 'release'. This is a high bar. I am concerned that, in order to overcome it, it may be necessary to show (through a comparative assessment of the kind I have described above) that the sites involved are preferable to all other potential options. It is difficult to see any particular reason why the consideration of alternatives to meet Luton's unmet needs should be limited to North Hertfordshire. Indeed, I am concerned that the Luton HMA may represent the most appropriate 'area of search' for this purpose. I am struggling to understand how exceptional circumstances can exist if one is left wondering whether there might be preferable options elsewhere within the applicable housing market area.(21)

...so far as I can tell and in the absence of any compelling evidence to the contrary, it seems that the undertaking of a Luton HMA-wide comparative analysis of this sort has not been thought necessary by any of the local authorities concerned. However, it does lead me to doubt the evidential justification for allocating the East of Luton sites...(23)

13. Issues relating to Sustainability Appraisal (which have been omitted from the quotes above) are dealt with separately below.

Context

14. As set out in paragraphs 6 to 8 above, an unmet need of 9,300 homes has been identified arising from Luton over the period 2011-2031. This forms part of a 'to find' OAN figure of 23,300 homes across the Luton HMA.

15. In the case of the unmet needs arising from Luton, the relevant authorities have sought to address this in close proximity to where it arises (HOU7, p.2, paragraph 1.6 & NHDC Matter 5 statement, paragraph 30 and consistent with ORD10, p.31). This is clearly a sound approach as a matter of principle. Addressing unmet needs in this way ensures additional homes are closely linked in physical and functional terms to the 'exporting' authority.

16. Subsequent to the scheduled hearing sessions on the NHDC Plan, the four HMA authorities agreed a position statement for the purposes of Central Bedfordshire's examination in April 2018 (their reference ED D02). Relevant material from Central

Bedfordshire's examination is attached as Appendix 1 to this paper. The position statement was signed by representatives for each authority. It reiterated that (underlining added):

The remaining balance of housing need generated within Luton up to 2031, is a further 9,300 dwellings, which should be located as close to the boundary of Luton as possible.

17. This broad approach has recently been recognised as appropriate by the Inspector examining the partial review of Cherwell District Council's Plan which aims to contribute towards unmet needs arising from Oxford:

Put simply, the approach taken is to locate the housing and infrastructure required as close as possible to Oxford, along the A44 and A4165 transport corridors. To my mind, while most of the allocations proposed are in the Oxford Green Belt, this is an appropriate strategy because it is that most likely to foster transport choices other than the private car and minimise travel distances, and least likely to interfere with the delivery of housing elsewhere in Cherwell.

Inspector's Post-Hearings Advice Note to Cherwell District Council, July 2019¹

18. In the case of the proposed East of Luton sites within NHDC, the allocations would appear on the ground as a seamless extension to the town from where the unmet need arises. Providing homes for Luton's unmet needs in this location allows for new forming households from Luton in need of both market and Affordable Housing to be homed within the same conurbation. It also allows for those households to form and move without necessarily disrupting their existing patterns of employment or schooling.
19. Making provision in (relatively) more remote locations removes that clear functional link. It lessens the chances that market housing will genuinely address unmet needs; over one-third of house moves are over a distance of less than two miles from the previous property, over half are within five miles². It also risks a domino effect particularly in relation to affordable housing. Reserving affordable homes in locations such as, for example, Harlington or Flitwick (in Central Bedfordshire) for Luton's unmet needs in turn risks displacing affordable housing need from those settlements elsewhere.
20. In the above context, the Council does not agree with the Inspector's view that 'the [entirety of] the Luton HMA may represent the most appropriate 'area of search'. It does not. The most appropriate sites to meet Luton's needs are those in close proximity to Luton that do not unduly 'interfere with the delivery of housing elsewhere'.

¹ <https://www.cherwell.gov.uk/info/83/local-plans/515/local-plan-part-1-partial-review---examination/6> (see Document Reference PC5, accessed October 2019)

² English Housing Survey 2013-14 household report using same source data as referenced in HOU2, paragraph 4.8, p.39

21. However, even this approach cannot be viewed in isolation. In considering potential options to address the unmet need it remains necessary for the HMA authorities to also consider how they might accommodate those ‘indigenous’ needs arising from within their own authority area insofar as it lies within the Luton HMA (see paragraph 8 above). This is particularly relevant for Central Bedfordshire who would need to find land for 13,400 homes to meet its own share of need arising within the Luton HMA over the period 2011-2031 before making a ‘net’ contribution to any unmet needs for Luton (HOU1, p.15, paragraph 4.32; ED159, p.2, Table 1). Some of this indigenous need arises in those parts of Central Bedfordshire closest to Luton, particularly Dunstable and Houghton Regis. The three towns form a continuous conurbation.
22. Consideration of how Central Bedfordshire has chosen to address this issue is primarily a matter for the ongoing examination of their own plan. However, as a general principle, potential options identified in the Growth Study (or elsewhere) within Central Bedfordshire and / or within or in close proximity to the Luton / Dunstable / Houghton Regis conurbation cannot automatically be assumed as being (wholly) available for addressing unmet needs arising from Luton. A more detailed summary of the current position in Central Bedfordshire is set out in paragraphs 42 to 59 below to aid the Inspector’s understanding.
23. It is finally worth re-emphasising that a key influence on the scale of the proposed allocation East of Luton is the requirement for it to be self-sustaining in terms of education provision. This point has already been explained at length to the examination. In NHDC’s view, the contribution that this authority makes to Luton’s unmet needs will be 1,950 homes or it will be nothing.

Options for addressing Luton’s unmet need on the face of the Growth Study (HOU7)

24. Having established that seeking to address unmet needs in close proximity to Luton is a sound approach in principle, it is necessary to consider how the housing market area authorities have worked together to identify potential options to address this issue.
25. The four authorities jointly commissioned and participated in the completion of the Luton HMA Growth Options Study (the Growth Study)(HOU7). The Growth Study identifies 31 potential growth locations, L1 to L31 inclusive (HOU7, Figure 2.2, p.6). The East of Luton sites are identified as potential growth location L22. All of the remaining potential growth locations are within Central Bedfordshire with the exception of L31 which lies within Aylesbury Vale’s administrative area.
26. The Growth Study recognises that Green Belt is a relevant policy restriction across much of the HMA, not just within North Hertfordshire; Most of the potential alternate locations within the Growth Study would also require *exceptional circumstances* to be demonstrated:

“With the exception of the built-up areas of Luton and Dunstable, a narrow band on its south western edge in Aylesbury Vale and a band north and east of Flitwick, the remainder of the Luton HMA is Green Belt.”

(HOU7, p.9, paragraph 2.38)

27. The Growth Study's approach to converting the findings of the North Hertfordshire and Central Bedfordshire & Luton Green Belt studies is set out in paragraphs 2.41 and 2.42 of HOU7 (p.10). On this methodology, the East of Luton sites are considered to make a 'strong' contribution to Green Belt purposes, the highest available rating. The Growth Study's approach is therefore consistent with the Green Belt Review Update (ED161) and remains a robust basis upon which to address the Inspector's concerns on this matter. The Growth Study presents various packages of potential locations (HOU7, Table 3.7, pp.40-42). Whilst these are typology based, the information underpinning the Growth Study enables other combinations of potential growth locations to be presented. These are set out below and allow the Councils' position regarding physical proximity to be explained and also address the Inspector's concerns in relation to Green Belt harm.
28. Figure 3.3 of the Growth Study (HOU7, p.28) shows the 31 potential growth locations overlain on the Growth Study's assessment of overall contribution to Green Belt purposes. An extract from this figure detailing sites around the Luton, Dunstable and Houghton Regis conurbation is replicated on the following page. The darkest green shading shows the areas assessed as having the strongest Green Belt contribution. Table 3.3. (HOU7, pp.26-28) identifies the contribution to Green Belt purposes that the potential growth locations make.
29. The figures in this sub-section consider the capacity which might be realised without use of the East of Luton sites. Some figures presented here are based on the prospective use of only certain parts of potential growth locations identified in the Growth Study, for example those parts of locations not in the Green Belt or in areas of lower Green Belt harm. It has been assumed for the purposes of this sub-section that using only parts of relevant potential growth locations would still represent a coherent, available and viable option³. This might not necessarily be the case. The figures underpinning the analysis in this sub-section are contained in Appendix 2.

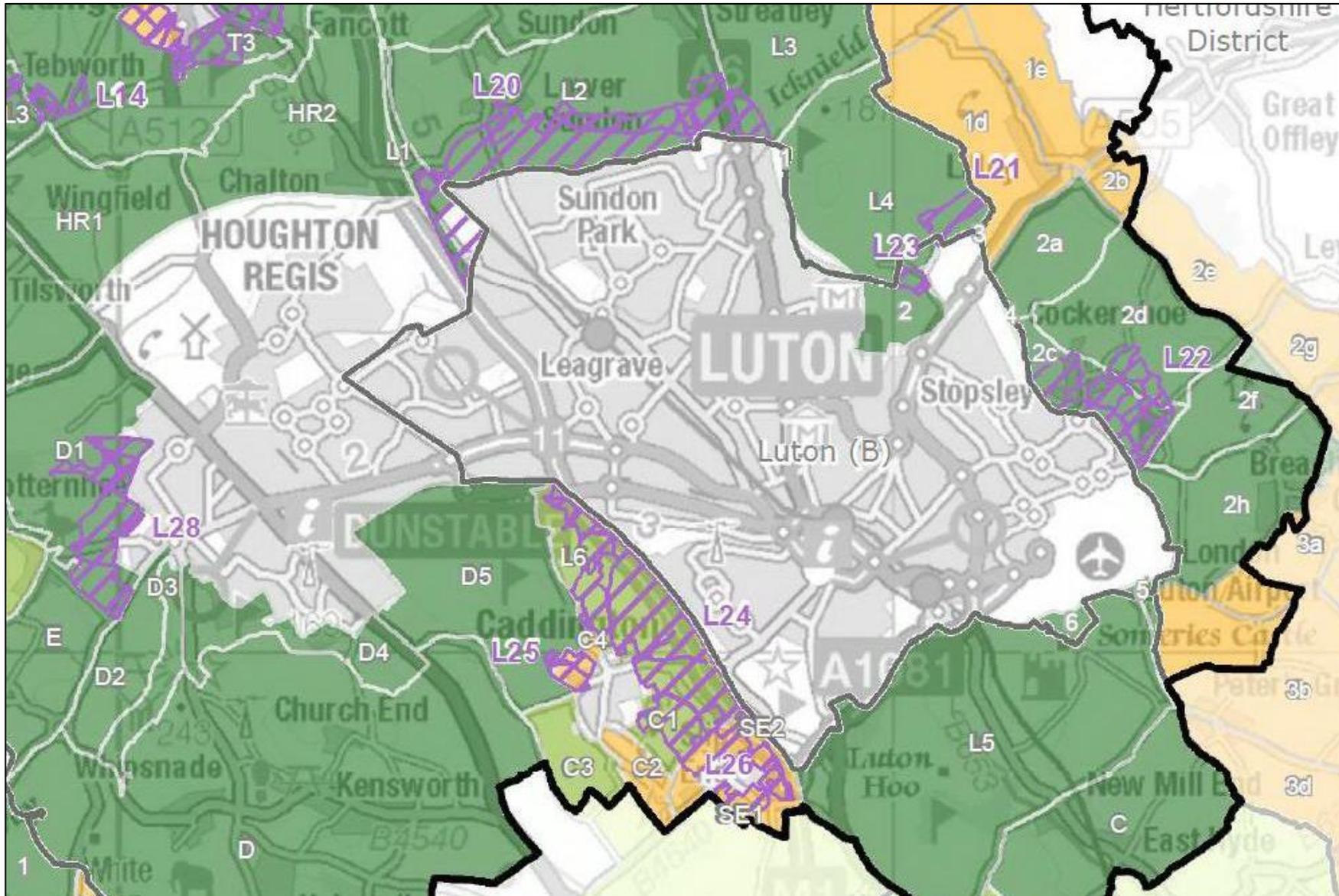
Potential alternate options adjoining Luton, Dunstable & Houghton Regis

30. Excluding the East of Luton Sites (L22), there are six potential alternate growth locations that could deliver development physically contiguous with Luton Borough (L20, L21, L23, L24, L25⁴ & L26). A seventh location is included once this is expanded to the wider Luton / Dunstable / Houghton Regis conurbation (as above plus L28).

³ Unless such areas are *de minimis* e.g. only accounting for 1% or 2% of the location's total area. Where sites would be split, estimates of dwelling capacity have been pro-rated based upon the % of the site area for the purposes of this paper. Figures have been derived from Table 3.3 (pp.26-27) and the individual site pro-formas contained in Appendix 5 of HOU7.

⁴ L25 is not in itself physically contiguous with Luton but adjoins L24 which is.

Figure 1: Potential Growth Locations around Luton, Dunstable & Houghton Regis identified in the Growth Study (HOU7)



Source: HOU7 (Figure 3.3, p.28)

31. It can be seen from the map extract above that only potential growth locations L24, L25 and L26 do not make a strong Green Belt contribution. The summary table below shows that the Growth Study identified potential capacity for just 200 homes around the conurbation without resort to Green Belt and less than 3,000 homes without resort to (those parts of) potential growth locations making a strong Green Belt contribution. This is less than one-third of the unmet housing need figure for Luton even before any account is taken of needs arising in these areas of Central Bedfordshire.

	No. of locations	Capacity to 2031	Of which...			
			Outside Green Belt (GB)	Moderate GB contribution	Relatively strong GB contribution	Strong GB contribution
Physically contiguous with Luton	6	5,998	200	1,400	1,320	3,078
Physically contiguous with Luton / Dunstable / Houghton Regis	7	7,198	200	1,400	1,320	4,278

Source: *Compiled by NHDC from HOU7 (Table 3.3, Figure 3.3 & Appendix 5)*

32. These alternate potential growth locations had a total estimated capacity of approximately 7,200 homes. More than 4,000 of these homes would be in (parts of) potential growth locations considered to make a ‘strong’ Green Belt contribution. These (parts of) potential growth locations are not preferable to the proposed East of Luton sites in Green Belt terms as they are assessed as making the same level of contribution.

33. In any event, it is clear that the Growth Study does not identify sufficient alternate potential growth locations around the Luton, Dunstable & Houghton Regis conurbation that would allow Luton’s unmet housing needs to be met.

Potential alternate options with strong public transport links to Luton, Dunstable & Houghton Regis

34. As set out above, the HMA authorities have sought to preferentially meet Luton’s unmet need as close to source as possible. Notwithstanding this, locations with strong public transport links to the existing town might be considered preferable alternatives to physical proximity to Luton if Green Belt harms would be demonstrably lessened.

35. The Growth Study assessed access to a range of facilities (HOU7, pp.22-24). The methodology explains (HOU7, paragraph 2.19) that

It was considered that access to the first category – ‘Railway stations, guided busway stops and park and ride facilities’ (shown in bold text) – of potential housing development locations should be given greater weight than the other services and facilities.

36. On this basis, 12 potential growth locations (excluding East of Luton) can be identified which are *either* physically contiguous with the Luton, Dunstable & Houghton Regis urban area (as above) *or* assessed by the Growth Study as having good access to public transport hubs. This consists of the seven potential growth locations identified in paragraph 30 plus potential growth locations L5, L6, L7, L11 and L12. These additional locations are those identified as being (partially) within 1200m of a rail station, guided busway stop or park & ride as shown in Figure 3.2 of HOU7 (p.24).

37. The summary table below shows that the non-Green Belt capacity of these is again just 200 homes. The assessed capacity of non-Green Belt and areas of lesser Green Belt harm is higher at approximately 6,800 homes. However, this still remains significantly below the unmet need figure. This package also utilises all strategic expansion options around other settlements in Central Bedfordshire such as Harlington and Flitwick. The role of these potential growth locations in meeting Central Bedfordshire’s own needs within the Luton HMA must also be considered (see paragraph 19 *and* paragraphs 42 to 59 below).

	No. of locations	Capacity to 2031	Of which...			
			Outside Green Belt (GB)	Moderate GB contribution	Relatively strong GB contribution	Strong GB contribution
Locations with strong links to Luton	11	12,339	200	1,400	5,246	5,493

Source: *Compiled by NHDC from HOU7 (Table 3.3, Figures 3.2 & 3.3 & Appendix 5)*

38. Approximately 5,500 of the homes would be in (parts of) locations deemed to have a strong Green Belt contribution. These (parts of) potential growth locations are not preferable to the proposed East of Luton sites in Green Belt terms as they are assessed as making the same level of contribution.

39. It is clear that the Growth Study does not identify sufficient alternate potential growth locations with strong links to Luton – through *either* physical proximity *or* high-quality public transport accessibility – that would allow for Luton’s unmet housing needs to be met on land that is preferable to the East of Luton sites in Green Belt terms.

Potential alternate growth options across the Luton Housing Market Area

40. Excluding the East of Luton Sites, the Growth Study as a whole identified a total capacity of approximately 12,800 homes in (parts of) locations having less than a ‘strong’ Green Belt contribution. This exceeds the unmet housing need figure for Luton but account would have to be taken of needs arising in these areas of Central Bedfordshire. For the reasons set out in paragraphs 15 to 20 above, the Council does not consider all of these sites to be reasonable alternatives for meeting unmet housing needs arising from Luton in any event.

	No. of locations	Capacity to 2031	Of which...			
			Outside Green Belt (GB)	Moderate GB contribution or lower	Relatively strong GB contribution or lower	Strong GB contribution
All locations	30	23,843	3,950	2,135	7,039	10,719

Source: *Compiled by NHDC from HOU7 (Tables 1 & 3.3, Figure 3.3 & Appendix 5)*

41. It is clear that the Growth Study does not identify sufficient alternate potential growth locations that would allow for Luton’s unmet housing needs *and* housing needs arising from that part of Central Bedfordshire within the Luton HMA to be met on land that is preferable to the East of Luton sites in Green Belt terms.

Options for addressing Luton’s unmet need having regard to Central Bedfordshire’s emerging Local Plan

42. In moving forward from the Growth Study, Central Bedfordshire have undertaken further work and analysis. This has informed their decisions as to which of the potential growth locations in HOU7 – along with other sources of supply that were outside of this study’s remit – should be carried forward to address (i) unmet housing needs arising from Luton and (ii) their own housing needs insofar as they lie within the Luton HMA. As established at Paragraph 22 of this paper, the soundness of these decisions is a matter for the ongoing examination of Central Bedfordshire’s own plan. The below is presented without prejudice to any future representations this Council may seek to make to that examination and does not necessarily represent either an endorsement or criticism of the relevant parts of Central Bedfordshire’s Plan by NHDC.

43. The strategy submitted for examination by Central Bedfordshire is set out in their pre-submission Local Plan (ORD10). This is supplemented by a wide-ranging evidence base as well as information subsequently produced in advance of, and in response to, their own examination hearings held between May and July 2019⁵.

44. From this it can firstly be seen that the West Luton growth location (HOU7 site reference L24) was not taken forward as a proposed allocation. It is instead identified only as a location for future development to be considered in a subsequent partial plan review (ORD10, paragraph 6.2.8, p.35). Explanation for this approach is set out in Central Bedfordshire’s statement to their own examination:

The next stage [following the Growth Study] was to consider the relative merits of these sites at a more detailed site-specific level through the technical site assessment process carried out as part of the SHLAA and in this instance, this

⁵ Central Bedfordshire’s submission and examination documents can be viewed at https://www.centralbedfordshire.gov.uk/info/45/planning_policy/468/local_plan/12 and https://www.centralbedfordshire.gov.uk/info/45/planning_policy/468/local_plan_-_overview/13 respectively

was particularly crucial due to the fact that the high-level study was not conclusive.

While development of West of Luton has the potential to deliver public benefits including the provision of homes to meet housing needs arising in the Luton HMA; local community infrastructure; local employment opportunities; the potential to provide a connection to the Luton and Dunstable Guided Busway; nonetheless these benefits are balanced against the considerable uncertainties surrounding development - the feasibility of connectivity with Luton (see Appendix B which provides a technical assessment of the transport proposals); whether a guided busway connection could be delivered by this scheme; the requirement for significant landscape buffers to ensure separation between the proposed urban extension and existing neighbouring settlements; the retention of the chalk valley side running parallel to the M1 and creation of a strategic woodland buffer to minimise impacts on landscape; and the capacity of the local waste water treatment network to support the substantial increase in population.

There is also considerable uncertainty regarding the expansion plans of Luton Airport, and the environmental technical work which will help to clarify the position, will not be published until later this year. Depending on the option proposed this is likely to have an impact on the design, layout, capacity and viability of the site. For these reasons, the site is not considered suitable at this present time, but subject to further assessment may have some development potential in the future.

Central Bedfordshire Council statement to Central Bedfordshire Local Plan Examination, Matter 4

45. As shown above (see paragraph 31), L24 was one of the potential options identified around Luton that had a lower assessed level of Green Belt harm than the proposed East of Luton sites. However, Central Bedfordshire have subsequently determined that this site does not meet the relevant requirements to be allocated for development at this time. This means it cannot presently be considered a preferable potential growth location to the East of Luton sites. The decision of Central Bedfordshire not to subsequently carry this site forward reinforces this Council's conclusions, set out at paragraphs 32 and 33 above, that there are insufficient preferable alternate options around the Luton, Dunstable and Houghton Regis conurbation to justify the removal of the proposed East of Luton sites from the Plan.
46. It can secondly be seen that, following the further analysis referenced above, the significant majority of potential alternate locations identified in the Growth Study within Central Bedfordshire have not been taken forward for proposed allocation (either in whole or in part). NHDC have identified the following new allocations in Central Bedfordshire's submission Plan that make use of either the whole or part of potential growth locations identified in the Growth Study:

- Policy SA1: North of Luton (ORD10, pp53-56) (within Growth Study ref L20)
- Site HAS05: Land east of Barton-le-Clay (ORD10, p.80) (L10)
- Site HAS14: Land off Eaton Park, Eaton Bray (ORD10, p.81) (L29)
- Site HAS17: Steppingley Road, Flitwick (ORD10, p.81) (L5)
- Site HAS19: Land at Upper Gravenhurst (ORD10, p.81) (L9)
- Site HAS20: Land west of MMR, Harlington (ORD10, p.82) (L12)
- Site HAS24: Land to the SW of the A5, Hockliffe (ORD10, p.82) (L15)
- Site HAS25: Land at Leighton Road, Hockliffe (ORD10, p.82) (L15)
- Site HAS38: Land fronting Silsoe Road, Maulden (ORD10, p.83) (L2)
- Site HAS49: Land east of Leighton Road, Toddington (ORD10, p.84) (L13)
- Site HAS52: Land off Flitwick Road, Westoning (ORD10, p.85) (L11)

47. Only four of these sites (Policy SA1, HAS17, HAS20 & HAS52) relate to potential growth locations within the Growth Study that are considered to have strong links to Luton. This reinforces this Council's conclusion, set out at paragraph 39 above, that there are insufficient preferable options *either* around the Luton, Dunstable and Houghton Regis *or* linked to it by high-quality public transport to justify the removal of the proposed East of Luton sites from the Plan.

48. In total, NHDC have identified less than 3,500 homes within ORD10 that are considered deliverable by 2031 and are proposed for allocation on sites that featured as potential growth locations in the Growth Study. This compares to the Growth Study's estimate of potential capacity to 2031 from locations within Central Bedfordshire of over 22,500 homes.

49. These substantial reductions are offset, at least in part, by Central Bedfordshire's acknowledgement that a large extant permission north of Houghton Regis will contribute towards meeting unmet housing needs from Luton. This site was not included for analysis in the Growth Study but can be seen identified by yellow shading as a committed housing site in Figure 2.2 of that document (HOU7, p.6).

50. Examination sessions on Central Bedfordshire's Plan were held between May and July 2019. In response to issues raised during these sessions, Central Bedfordshire submitted an additional document following the hearings (their reference Exam 41). This sought to clarify which allocations within the local plan are intended to meet Luton's unmet needs. A copy of this note is included in Appendix 1. Paragraph 1 of this note identifies 13 sites which Central Bedfordshire consider will address the unmet housing needs of 7,350 homes arising from Luton (i.e. the total unmet need of 9,300 homes minus the proposed contribution of 1,950 homes contained in this Plan).

51. The approximate capacity of these sites to 2031, as set out in the table beneath Paragraph 2 of Exam 41, was stated to be between 8,662 and 8,685 homes. On face value this exceeds the 7,350 homes quoted above. However, for the reasons set out below, this paper cannot be viewed in isolation. Once further relevant facts are taken into account, Exam 41 does not demonstrate an overprovision against the unmet needs of Luton such as to call into question the justification for the proposed east of Luton

sites. Notes provided by Central Bedfordshire to NHDC which inform this position are contained in Appendix 3.

52. Firstly, Central Bedfordshire considers that any surplus these sites might deliver over and above 7,350 homes is required to provide a buffer for flexibility to ensure the unmet needs of Luton are genuinely met (see Paragraph 57 and Appendix 3).

53. Secondly, NHDC notes that some of the sites identified in Exam 41 are relatively remote from Luton in locations such as Barton-Le-Clay, Hockliffe and Toddington. These sites are not identified in the analysis above as being in close physical proximity to Luton or otherwise connected to it by high-quality public transport. Notwithstanding any differences in Green Belt analysis, they could not be considered as preferable locations to the East of Luton sites on a holistic planning judgement in any event.

54. Thirdly, subsequent correspondence from the Central Bedfordshire Inspectors has called into question the likelihood of delivery on some of these sites. The Inspectors' Post Hearing Letter of 30 September 2019 (Central Beds reference Exam 69, also contained in Appendix 1) expressly rejects sites HAS04, HAS07 and HAS20 as being unsound. Removing these sites from the Plan would have the effect of reducing the identified capacity for Luton's unmet needs set out in Exam 41. The proposed allocation of sites HAS24, HAS25 and HAS26 are additionally called into question although Central Bedfordshire remain of the opinion that these allocations are sound and should remain in the Plan.

55. More fundamentally, the Inspectors' correspondence expresses concerns over Central Bedfordshire's approach as a whole. Concerns are raised over the proposed North of Luton allocation and the sustainability appraisal. In subsequent correspondence, the Inspectors state they are yet to:

...consider whether it is feasible for the examination to continue in light of the concerns set out in our earlier letter, or, whether the most appropriate way forward would be for the Plan to be withdrawn.

Inspectors Letter to Central Bedfordshire, 28 October 2019

56. This plainly calls into question the likelihood of delivery on all of the sites identified by Central Bedfordshire in Exam 41. At minimum, this Council would now anticipate a substantive delay to the examination of the Central Bedfordshire Plan which will inevitably impact further upon the assumptions set out in that document. The latest correspondence from Central Bedfordshire to NHDC states they have "taken a pragmatic view that delivery of unmet need will not commence until early 2021".

57. Based on the information currently available and the present situation, Central Bedfordshire consider 7,737 homes will be delivered within that part of the Luton HMA falling within their administrative area to address unmet housing needs arising from Luton by 2031. This represents a buffer of 5% on Central Bedfordshire's contribution towards Luton's unmet need and 4% on the unmet need as a whole.

58. NHDC have identified a further 7,594 homes to be delivered within the Luton HMA over the period 2011-2031. These would assist in addressing housing needs arising from that part of Central Bedfordshire within the Luton HMA. However, this figure falls well short of the 13,400-home need arising as quoted in paragraphs 8, 12 and 21 of this paper to meet Central Bedfordshire’s own needs in the Luton HMA.

Source	Addressing Central Beds’ housing needs within Luton HMA 2011-2031
Completions 2011-15	1,638
Windfalls	717
Commitments	4,465 ⁶
Proposed allocations	774
Total	7,594

Source: Compiled by NHDC. Detailed figures are included in Appendix 4.

59. The figures in Paragraph 58 and the table above are presented for context only. They have been prepared by NHDC to align with the plan periods for Luton and North Hertfordshire and allow comparison with figures quoted elsewhere in this paper and other relevant evidence submitted to the examination. Central Bedfordshire’s Plan has a different plan period of 2015-2035. The soundness of their proposed approach to meeting identified needs for this period is a matter for their own examination to consider.

Conclusions

- 60. The delays and uncertainties outlined above place a further imperative upon this examination to support the Council’s proposed allocation. The Inspector has already acknowledged the acute and pressing nature of the unmet housing need arising from Luton (Paragraph 19 of the July letter).
- 61. The above demonstrates that there are no sites within Central Bedfordshire or the remainder of the Luton HMA which might be considered preferable to the East of Luton sites in Green Belt terms such as to justify their removal from the Plan. Indeed, present figures suggest that Central Bedfordshire will not deliver sufficient homes within their part of the Luton HMA to meet the ‘indigenous’ needs arising from their own authority over the period 2011-2031.
- 62. Furthermore, a number of the sites presently identified by Central Bedfordshire to meet Luton’s unmet needs through their own Plan must be viewed as less preferable locations on a rounded view of their planning merits; although the proposed North of Luton site adjoins the existing conurbation (similarly to the proposed East of Luton sites), other options identified in Exam 41 do not share the same physical connectivity or public transport links.

⁶ This figure includes 1,098 homes on the edge of Leighton Buzzard that NHDC consider fall within the functional Luton HMA on a strict reading of Fig 38 of HOU2 (p.47). HOU2 identifies that Leighton Buzzard itself should form part of the Milton Keynes functional HMA (Paragraph 5.7, p.47). These homes may therefore be more appropriately attributed to the Milton Keynes HMA. This would reduce the figures shown within this table by a commensurate amount.

63. The Inspectors' interventions in the Central Bedfordshire examination have further reduced the reliance which might be placed upon delivery from these sites at this time. There remains a risk that Central Bedfordshire may be instructed to withdraw their plan in its entirety and start the plan-making process over again.
64. The proposed East of Luton sites represent a deliverable option for which exceptional circumstances have been clearly demonstrated. Given the existing shortfall set out above, there is no realistic prospect of Central Bedfordshire absorbing an additional 2,100 homes within the Luton HMA if these sites are not preserved within North Hertfordshire's plan.
65. In this context, the Council strongly suggests that no further comparative analysis is necessary. It would serve no planning purpose; rather it would simply serve to delay the delivery of housing on a site that any such study would inevitably recommend formed part of the most robust planning strategy for this matter. The Inspector is invited to reach a positive conclusion and recommendation on this matter on the basis of the present evidence.

Inspector's Query 4 – Robustness of the Sustainability Appraisal in this respect

Natural England says "There hasn't been an adequate assessment of alternatives [to the East of Luton sites]. The Sustainability Appraisal should set out alternative locations/sites considered to meet the housing need elsewhere ... Thus alternatives [to the East of Luton sites] should be presented [in the Sustainability Appraisal] both within Luton and other neighbouring local authorities". (22)

...so far as I can tell and in the absence of any compelling evidence to the contrary, it seems that the undertaking of a Luton HMA-wide comparative analysis of this sort has not been thought necessary by any of the local authorities concerned. However, it does lead me to doubt...the robustness of the Sustainability Appraisal in this respect. (23)

66. The Inspector's letter correctly accepts at Paragraph 22, that it lies beyond the jurisdiction of the SA to make judgements about options beyond the Plan area⁷. The Council accepts that it is reasonable for the Inspector to consider alternative options outside of North Hertfordshire in his consideration of exceptional circumstances (see above). However, it does not accept the position set out by Natural England in relation to the Sustainability Appraisal; the only way in which a Sustainability Appraisal might cover options in the wider HMA would be through a joint statutory Plan with one or more of the authorities in Luton HMA.
67. A joint Plan has not been pursued. There has been no credible suggestion to the examination from the Inspector or any other party that a joint Plan should have been

⁷ Regulation 12(2)(b) of The Environmental Assessment of Plans and Programmes Regulations 2004 states that environmental reports shall identify, describe and evaluate the likely significant effects on the environment of reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme (as quoted in LP4, NHDC page number 29 and NHDC Matter 1 Statement, paragraph 52 (emphasis added)).

pursued. The Inspector's Matters and Issues for the scheduled hearing sessions (ED10) do not at any point raise the question of a joint Plan.

68. The Duty to Co-operate Compliance Statement recognises the practical difficulties of pursuing any such arrangements (SOC1, p.6, paragraphs 2.12 to 2.14). In particular it notes that Luton had proceeded to submission and examination in advance of the NHDC plan. Central Bedfordshire was anticipated to proceed to submission and examination after.

69. The question of (the efficacy of) joint planning was considered at length by the Inspector examining the Luton Local Plan. On the prospects of a joint plan involving Luton and NHDC he unequivocally concluded:

Only a small part of North Hertfordshire and Aylesbury Vale fall within the Luton HMA and both have more extensive housing market relationships with other authorities. Consequently, the prospect of preparing a joint plan with Luton would not have been a realistic option in this context

(ED4, p.9, paragraph 30).

70. The Inspector also considered the question of a prospective joint or aligned plan between Central Bedfordshire and Luton. These authorities together form the substantial majority of the Luton HMA and are considered the 'best fit' grouping for the purposes of analysing evidence and drafting policy (HOU2, pp.48-51, Figure 39 and paragraphs 5.14, 5.22, 5.31 and 5.32). On this matter the Luton Inspector similarly concluded:

...there is no certainty that more constructive outcomes on strategic matters might have been achieved more quickly through a joint plan (ED4, pp.8-9, paragraph 29)

...There has been some consideration of alignment, particularly between Luton and Central Bedfordshire...Again it is unlikely that Luton could realistically have done more on this without very significantly delaying its own plan. In respect of other authorities, the complexities of the various housing market areas makes achieving alignment more difficult

(ED4, p.9, paragraph 31)

71. The Inspector examining the Luton Plan did not consider joint planning or alignment between Luton and Central Bedfordshire or Luton and North Hertfordshire / Aylesbury Vale to be a realistic or necessary prospect. In this context it would be unreasonable to consider such a requirement might apply between NHDC and either or both of Central Bedfordshire or Aylesbury Vale given the very limited area of the District that falls within the Luton HMA.

72. For these reasons the Council considers the Inspector is wrong to doubt the robustness of the sustainability appraisal in this respect.

Conclusions

I ask the Council to consider carefully my misgivings. To assist, I would suggest that there are several possible ways forward (Paragraph 25)

73. This supplementary paper, alongside the extensive evidence already submitted to the examination both verbally and in writing, clearly addresses the key concerns raised by the Inspector in relation to the proposed East of Luton sites. In summary:

- The Plan and associated evidence repeatedly makes clear that these sites are substantively intended to address unmet needs arising from Luton Borough. Any (perceived) statements to the contrary can be safely disregarded;
- The increase in assessed harm to the Green Belt arising from these proposed allocations arises from a rational, robust and consistently-applied methodological 'shift' in the Green Belt Review update taking into account relevant case law on the assessment of openness;
- There are no reasonable grounds on which further comparative assessment is required; Central Bedfordshire has determined not to take forward a number of sites and options in their own Plan following further analysis. This approach is a matter to be explored through their own examination. However, an analysis of the present situation demonstrates there is no reasonable prospect of Central Bedfordshire absorbing an additional 2,100 homes within the Luton HMA should the Inspector resolve to remove the proposed East of Luton sites from the Plan;
- Although it is reasonable to explore reasonable alternatives to the East of Luton sites on Green Belt grounds to satisfy the *exceptional circumstances* test of the NPPF, there are no grounds upon which to require the sustainability appraisal to explore further reasonable alternatives or spatial options beyond NHDC's administrative boundaries.

74. This supplementary paper reinforces points made extensively in submissions to the Examination. NHDC has already made its case clearly, consistently and at length. The Council does not consider a further hearing on this matter is required and invites the Inspector not to recommend any further main modifications in relation to the East of Luton sites.

Appendix 1: (Extracts from) Documents and correspondence submitted to Central Bedfordshire Local Plan Examination

- Document ED D02 – Duty to Co-operate Statement (Appendix D)
- Central Bedfordshire Council Matter 4 Hearing Statement (Issue 1 Q1-Q3, Issue 5 & Appendix B)
- Document Exam 41 – Policy SP1 amendment
- Document Exam 69 – Inspectors' post-hearing letter to CBC, 30 September 2019
- Document Exam 79 – Inspectors' response to CBC, 28 October 2019

Note: Extracts from the documents are included insofar as they are considered relevant to this matter. The whole of the document and / or any associated appendices have not necessarily been included as shown above. Please refer to Central Bedfordshire website for full, original versions of these documents

Central Bedfordshire Council Local Plan (2015-2035)

Duty to Co-operate Statement

Appendix D: GO's Position Statement
(April 2018)

Position Paper on Luton HMA Housing Distribution
Luton Housing Market Area & Distribution of Unmet Housing Need
from Luton

**Between Luton Borough Council, Central Bedfordshire Council, North Herts
District Council and Aylesbury Vale District Council.**

This Position Paper forms the basis for the joint local authority “draft agreement” to set out how the potential distribution of growth could be met within the Luton HMA following publication of the Joint Growth options Study.

The Position Paper sets out the framework for further ‘Duty to Cooperate’ discussions between the local authorities and the review and updating of Statements of Common Ground (SoCG) and / or Memoranda of Understanding (MoU), in order to translate the outcomes of the Joint Growth Options Study into respective evidence and plan-making processes and differing timescales including processes for monitoring and review.

The process and impetus for formulating the Position Statement is set out in clauses i) to v) of the submitted Q80 response (issued on 26th September 2016 – Examination document ED062) to the Planning Inspector examining Luton’s Local Plan. The Q80 response was agreed and signed by all four authorities within Luton’s wider HMA.

This Position Statement is proposed by the Officer Group reporting to the Steering Group and once agreed, will be put for consideration to a Director level meeting for agreement in order to form a joint MoU.

1. This Position Paper sets out the agreed position on the distribution of housing needs of the Luton HMA and unmet housing needs from Luton. The Luton Housing Market Area includes all of Luton a significant area of CBC and smaller areas of AVDC and NHDC.

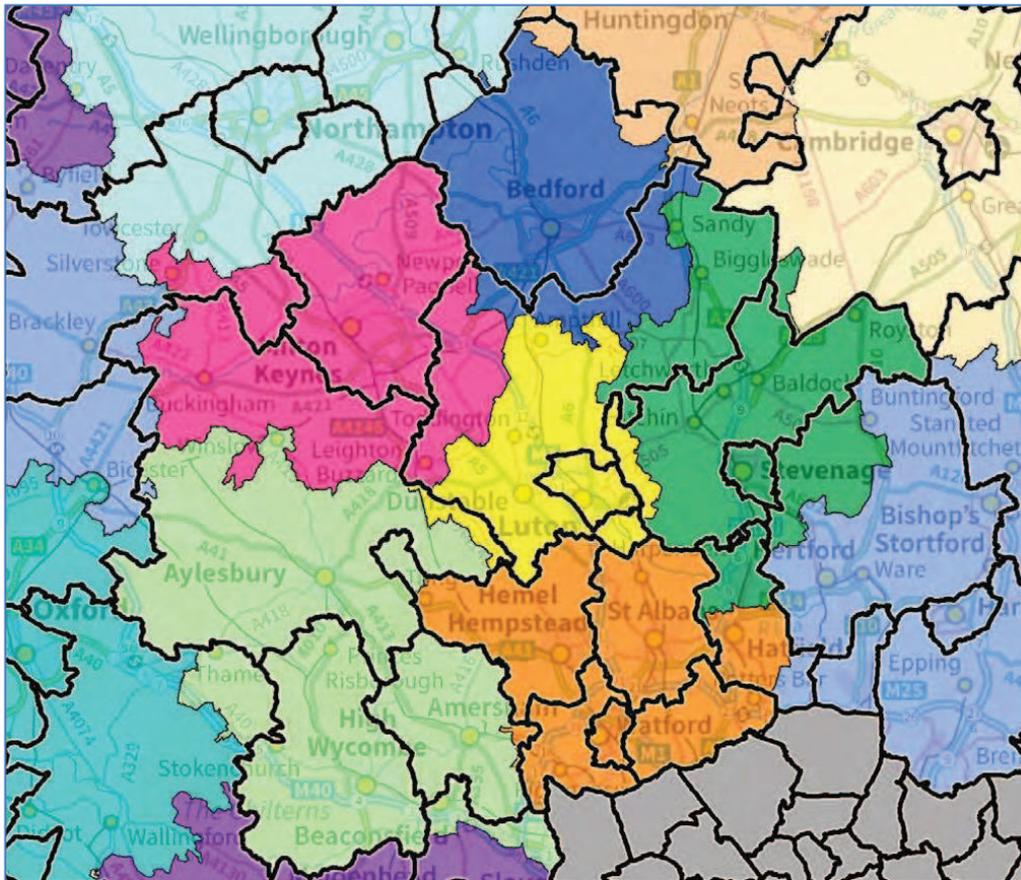


Figure 38: Functional Housing Market Areas with Local Authority Boundaries

<http://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Housing/HOU%20003d.pdf> SHMA 2015

2. The Position Paper covers the plan periods 2011 to 2031 and 2015 to 2035 in accordance with these timescales addressed within the Joint Growth options Study.
3. The Position Statement is based solely on the findings of three jointly commissioned studies under the Duty to Cooperate pursued in accordance with the respective SoCG.
 - The Housing Market Areas in Bedfordshire and Surrounding Areas Study 2015. (Bedford, Milton Keynes, North Hertfordshire, Stevenage, Luton, Aylesbury Vale and Central Bedfordshire).
 - The Joint Strategic Housing Market Assessment 2015 Study (Luton and Central Bedfordshire)
 - The Joint Growth Options Study for the Luton Housing Market Area (Central Bedfordshire Council, Luton Borough Council, Aylesbury Vale and North Hertfordshire District Councils).

4. The agreed proposed housing distribution arising from the Luton HMA for the period of 2011 - 2031 are as listed below and it will be for each Council to determine and justify any site allocations in their respective local plans.
 - LBC: 8,500
 - CBC: 20,750 (13,400 CBC need + 7,350 Luton unmet need)¹
 - NHDC: 2,150 (200 NHDC need +1,950 Luton unmet need)
 - AVDC: 400
 - HMA Total = 31,800

5. This Position Statement is intended to demonstrate the extent of joint working and cooperation that has been undertaken by the commissioning authorities whose representative signatures appear below and which has resulted in an agreed position as a Memorandum of Understanding as follows:
 - The joint SHMA with Luton identifies a requirement for 17,800 additional dwellings in the Borough between 2011 and 2031.
 - Luton have identified in their Local Plan that a minimum of 8,500 dwellings will be accommodated within Luton's administrative area during this period.
 - The remaining balance of housing need generated within Luton up to 2031, is a further 9,300 dwellings, which should be located as close to the boundary of Luton as possible. Of this, 1,950 dwellings are planned to be met within North Hertfordshire to the East of Luton adjacent to the Borough boundary, as detailed within the North Hertfordshire Submission Local Plan (May 2017). The balance of 7,350 homes will be accommodated within Central Bedfordshire in the Luton HMA². The Central Bedfordshire Local Plan 2015 to 2035 will seek to identify locations as close to the Luton and Dunstable conurbation as far as possible where this can be accommodated.

¹ This will be tested through the Central Bedfordshire Local Plan process.

² This will be tested through the Central Bedfordshire Local Plan process.

COMMISSIONING AUTHORITY : STEERING GROUP SIGNATURES**Central Bedfordshire Council**

Cllr Mrs Sue Clark

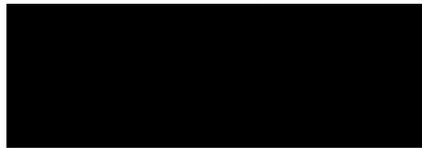
Deputy Executive Member for
Regeneration

24/04/2018

.....
(Signature).....
(Date)**Luton Borough Council**

Cllr Paul Castleman

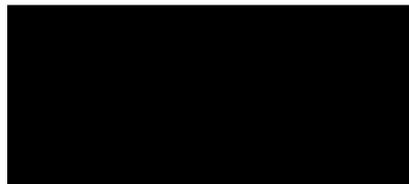
Planning Portfolio Holder



24/04/2018

.....
(Signature).....
(Date)**North Hertfordshire District Council**

Cllr David Levett

Executive Member for Planning &
Enterprise

27/04/2018

.....
(Signature).....
(Date)**Aylesbury Vale District Council**

Cllr Carole Paternoster

Cabinet Member for Growth Strategy



26/04/2018

.....
(Signature).....
(Date)

Central Bedfordshire Council Hearing Statement

Matter 4: Spatial Strategy (Policies SP1,
SP2, SP4, SP7 and Appendix 7)

A great place to live and work.

Issue 1 – Growth Strategy

Question 1:

How were the four areas referred to in paragraph 6.1.1 of the plan defined?

- 1.1.1 The Local Plan and accompanying evidence base refer to Central Bedfordshire being separated into four areas:
- A (South/Green Belt);
 - B (A1 Corridor);
 - C (East-West/Marston Vale);
 - D (Central Villages).
- 1.1.2 These areas are based on characteristics that define specific areas and reflect key influences on this character such as strategic transport links and the nature of settlements within the area.
- 1.1.3 As part of the preparatory work for the first draft of the Local Plan (regulation 18), Central Bedfordshire was divided into four areas which reflect the character of our towns, villages and countryside, existing and planned transport corridors, and the Green Belt designation. In recognition of the fact that Central Bedfordshire is a relatively large and diverse administrative area, this approach helped the Council to assess in broad terms growth potential for development of homes, economic opportunities and the scope to invest in local services and amenities. These were determined with the benefit of the known opportunities and constraints for Central Bedfordshire based on previous planmaking and existing technical evidence in 2016.
- 1.1.4 The Council then undertook public consultation from 13th September to 1st November 2016 known as “Shaping Central Bedfordshire’ on the growth potential of these internally derived four areas and also sought verification of the way in which they were defined. The overall purpose of this consultation was to help shape “big picture” options for growth and the spatial strategy approach in the Plan. The first draft of the Local Plan therefore evolved following this non-statutory consultation on the high-level strategy for growth.
- 1.1.5 The four areas were also informed by the Council’s ‘Community Planning’ work. This allowed information on the different areas of Central Bedfordshire to be captured at a local level. Fifteen community areas were mapped, which though larger than parish scale, were significantly more manageable than the whole of the authority area. These groupings were based on a number of factors:

- 1.1.6 Functional relationships e.g. ward areas, school catchments, access to services and facilities and shared characteristics, issues and opportunities.
- 1.1.7 These groupings based on commonalities enabled local residents to engage more effectively at a series of events (November 2016 to March 2017) to determine local issues and opportunities. Following these events, 15 Community Plans have been prepared and published as part of the evidence base for the Local Plan.
- 1.1.8 These four areas were therefore carried through the planmaking process from inception and initial consultation to the articulation of the strategy in the plan where they were used to group the growth location options considered at regulation 18 and then the allocations proposed at regulation 19.

Question 2:

Is the scale of growth proposed in the four areas commensurate with the size, scale and function of the settlements within each area? How was the level of growth for each area established?

- 1.2.1 The first element in determining levels of growth was the informal public consultation that was held before the regulation 18 consultation. The 'Shaping Central Bedfordshire' public consultation referenced in the response to Matter 4, Question 1, ran from 13th September to 1st November 2016 and achieved a good level of engagement, with 785 stakeholders providing their views on the proposals. The majority of responses came from residents (679) with others representing a number of businesses, Town and Parish Council's, voluntary and community organisations. The majority of respondents agreed with the characterisation of the four areas as set out within the consultation material. The first draft of the Local Plan therefore evolved following this non-statutory consultation on the high-level strategy for growth.
- 1.2.2 In response to a question which asked for suggestions for broad locations considered suitable for growth, those that responded indicated that growth should be located around existing infrastructure including rail stations and settlements and suggested the brownfield sites should be used. The approach of looking at existing opportunities like rail stations and looking for the intensification of brownfield sites was therefore integrated into the spatial strategy.
- 1.2.3 Analysis of the consultation responses showed that opinions on how growth should be apportioned broadly demonstrated no clear preference across Areas A, B and D. In Area C however, as an important economic area with advanced research and development at Cranfield Technology Park and Millbrook Proving Ground, a large proportion of respondents agreed that there is potential for medium to strategic scale growth

including new settlements and also agreed that there is limited potential for growth at existing settlements. This shows a degree of support and recognition of the growth opportunities and new transport infrastructure in the East West Corridor; and this is reflected in the spatial strategy.

1.2.4 Next, the Sustainability Appraisal (SA) was used to support the spatial strategy in this initial draft of the plan by undertaking the following:

- A high-level appraisal of the patterns of distribution (new small & town scale settlements; village extensions; growth in transport corridors; urban extensions; urban intensifications around transport hubs; and higher densities);
- A high-level appraisal of Areas A-D (as set out in the Shaping Central Bedfordshire consultation);
- An appraisal of five growth scenarios, using reasonable strategic growth locations; and

1.2.5 The five scenarios appraised were:

- Scenario 1: Higher levels of growth across all of Central Bedfordshire (the growth location options presented in this Plan);
- Scenario 2: No growth to the west of Luton and east of Biggleswade;
- Scenario 3: No strategic transport infrastructure delivered in the A1 corridor (Area B);
- Scenario 4: No growth in the Green Belt (Area A); and
- Scenario 5: A mixed approach with higher growth in villages

1.2.6 The SA supports growth in Areas A, B and C as having positive effects on housing delivery and employment. Area C is well-connected with the improved A421, the M1 and the planned section upgrade for East West Rail. Growth in Area B would support the East-West connections delivered by East West Rail and the Expressway; therefore Scenario 3 is not preferred. The Spatial Strategy contains options for new villages and urban extensions along the A1 corridor in Area B and near to the M1 in Area A and C. Across Areas A, B and C there is the potential for development to contribute to improvements of the road and public transport networks, to ensure continuing capacity.

1.2.7 The SA found that restricting growth of housing and employment uses in Area A due to the Green Belt, as considered in Scenario 4 is likely to have negative effects for the needs and health of communities in that part of CBC as well as the cross-boundary needs of Luton Borough. Without growth in Area A, communities would not benefit from the potential revitalisation that new development can provide. Area A has areas of higher deprivation, which new growth could have the potential for major positive effects.

- 1.2.8 The Spatial Strategy in this Plan contains options for urban extensions around Luton in Area A. There will be some positive effects on accessibility to services and facilities across all areas. In Area A, principally the Green Belt, larger scale developments have potential due to major opportunities to promote sustainable transport, for example using the Busway. The Spatial Strategy includes options for concentrating moderate growth in the rail corridor between Luton & Flitwick, therefore promoting sustainable development in an area constrained by Green Belt.
- 1.2.9 Less significant positive effects relate to Area D which is characterised by market towns and villages linked by rural roads. In Area D, the appraisal supports growth of small to medium scale, and focused around settlements with existing good services, to minimise negative effects from the need to travel by car. The spatial strategy therefore limits growth in Area D to village extensions, and the proposal for higher growth in villages as per Scenario 5 is not preferred.
- 1.2.10 Across Central Bedfordshire, providing higher levels of growth is likely to place more pressures on the capacity of infrastructure, but these pressures may be mitigated by the provision of new settlements and/or urban extensions, with the scale & scope for exemplar design, especially for sustainable energy and water; landscape and the potential enhancement of Green Infrastructure. Larger developments can be creative in scope and design offering enhancements to both existing and new communities with major positive effects.
- 1.2.11 The Council also undertook two Growth Options Studies (North and Luton HMA) in order to identify appropriate locations across the area to deliver strategic level growth. The purpose of the two studies was to establish spatial patterns and inform the spatial strategy and distribution of development for the plan.
- 1.2.12 The Growth Options Studies identified and assessed at a high level, potential options to help meet housing need within Central Bedfordshire, in terms of “deliverability” which is defined as including proximity to basic services, required new infrastructure being delivered in the vicinity of the site and expected demand for housing. The studies also provided an assessment of the capacity for all types of housing (market and affordable) based on assumed densities.
- 1.2.13 The locations within Central Bedfordshire assessed through the study were identified through the Councils’ ‘call for sites’ and Strategic Housing Land Availability Assessment (SHLAA) processes, and then grouped together, having been spatially mapped, to identify strategic scale locations for assessment. Where it was considered appropriate, ‘gaps’ between sites were included within the identification of a location in order to ensure the full potential of the location has been considered. The studies therefore considered a number of strategic locations across all three HMA’s.

- 1.2.14 The studies sought to consider the locations across five spatial themes. These five themes were included so as to generate alternative spatial distributions of development in a transparent and consistent way. The five spatial themes were:
- a new settlement;
 - a village extension;
 - growth in a transport corridor;
 - an urban extension; or
 - an urban intensification or extension centred around a transport hub.
- 1.2.15 It was concluded that a combination of the above is required in order to ensure the optimum balance of growth and continuous delivery of sustainable development throughout the plan period.
- 1.2.16 The key findings of the studies in relation to distribution of growth which were incorporated into the spatial strategy approach were:
- 1.2.17 Whilst Central Bedfordshire has a strong supply of land that has the potential to deliver growth, there are a number of constraints that exist, such as the Green Belt in the south and limited east/west connectivity and sustainable transport in the north, which can only be overcome through clear policy direction and significant national infrastructure investment including the proposals for the central section of East West Rail, a new Expressway and improvements to the A1 Corridor.
- 1.2.18 There are a number of potential large strategic sites across the area that would require significant developer contributions in order to be delivered and to be considered sustainable i.e. a dedicated bus link to an existing rail station or in the case of the largest developments, new, large scale infrastructure such as new rail stations or highway/junction improvements may be required.
- It will be necessary to release land from the Green Belt in order to ensure the delivery of sustainable development across Central Bedfordshire as a whole.
 - The potential for urban extensions around Luton – these could contribute to meeting unmet need arising from Luton.
 - Growth in the rail corridor between Luton and Flitwick – concentrating growth along key transport corridors, promoting sustainable development in an area that has seen little growth due to Green Belt restrictions.
 - Growth in the western area of Central Bedfordshire – will require significant infrastructure provision and a balanced approach to growth so as not to concentrate development to the west of Central Bedfordshire.

- Minor village extensions within Area D – limited growth due to the very rural nature of the area and limited capacity for significant sustainable transportation infrastructure
 - Growth along the A1 corridor – will require significant infrastructure provision to unlock the potential, provide balanced growth and help promote the eastern area of Central Bedfordshire.
- 1.2.19 In addition, in order to provide a settlement by settlement view to inform distribution at a more local scale, a Settlement Capacity Study (ED C42) was produced. This provides an assessment of the overall sustainability of settlements within Central Bedfordshire, taking into account physical and quantitative capacities - such as land area and roads/traffic, the presence/absence of certain facilities/services and their capacity; and qualitative capacities - such as landscape and community integration.
- 1.2.20 This then provided an objective by settlement appraisal of how much growth could sustainably be accommodated within existing towns and villages which was factored in when considering the overall distribution.
- 1.2.21 In summary, a range of consultation and technical evidence namely the: “Shaping Central Bedfordshire’ consultation, the Sustainability Appraisal, the Growth Options Studies, the Settlement Capacity Study, technical site assessment and consultation responses at regulation 18, established and ensured a commensurate scale of growth for each area and settlement.

Question 3:

In considering growth to meet Luton’s needs, why does the plan allocate land to the north of town (Policy SA1), and not to the west (which is identified instead as a possible area for future growth)?

- 1.3.1 The strategy supports strategic scale growth in the Green Belt within the Luton HMA close to the Luton conurbation in order to sustainably deliver unmet need from Luton.
- 1.3.2 Both growth locations (north and west) were therefore considered by the Luton HMA Growth Options Study (ED C15) and both scored in a high-level appraisal for overall deliverability as ‘high’.
- 1.3.3 The identification in this high-level study of a location as ‘high’ or ‘medium’ performance does not mean that they will ultimately be taken forward within the Local Plan, and similarly, a location that has been assessed as ‘low’ does not preclude any development coming forward, but instead it provided a guide as to where strategic level growth may be located across Central Bedfordshire.
- 1.3.4 The next stage was to consider the relative merits of these sites at a more detailed site-specific level through the technical site assessment process carried out as part of the SHLAA and in this instance, this was

particularly crucial due to the fact that the high-level study was not conclusive.

- 1.3.5 While development of West of Luton has the potential to deliver public benefits including the provision of homes to meet housing needs arising in the Luton HMA; local community infrastructure; local employment opportunities; the potential to provide a connection to the Luton and Dunstable Guided Busway; nonetheless these benefits are balanced against the considerable uncertainties surrounding development - the feasibility of connectivity with Luton (see Appendix B which provides a technical assessment of the transport proposals); whether a guided busway connection could be delivered by this scheme; the requirement for significant landscape buffers to ensure separation between the proposed urban extension and existing neighbouring settlements; the retention of the chalk valley side running parallel to the M1 and creation of a strategic woodland buffer to minimise impacts on landscape; and the capacity of the local waste water treatment network to support the substantial increase in population.
- 1.3.6 There is also considerable uncertainty regarding the expansion plans of Luton Airport, and the environmental technical work which will help to clarify the position, will not be published until later this year. Depending on the option proposed this is likely to have an impact on the design, layout, capacity and viability of the site. For these reasons, the site is not considered suitable at this present time, but subject to further assessment may have some development potential in the future.
- 1.3.7 In the case of North of Luton, it is considered that development of the site has the potential to deliver significant public benefits including the provision of a significant number of homes, the provision of local infrastructure, provision of local employment opportunities, provision of a significant amount of green infrastructure, the potential to provide a connection to the Luton and Dunstable Guided Busway, the potential to provide a strategic link road between the M1 and the A6 (benefiting from the A5-M1 Link; as well as the potential for development to be within close proximity to Luton and its services and facilities, whilst meeting Luton's Housing need where it arises.
- 1.3.8 Technical site assessment therefore demonstrates that the site is 'suitable' and so taking into account all evidence including the Sustainability Appraisal and Green Belt Studies in the round, this provides the most sustainable solution for the need for growth in the Luton HMA.

Issue 5 – Identified Locations for Future Growth

Question 1:

What is the justification for identifying broad locations for future growth beyond the plan period? What are the locations based on and how have they been determined?

- 5.1.1 The Plan does identify what are termed 'Identified Areas for Future Growth' but they are not 'broad locations' as defined by the Strategic Housing Land Availability Assessment guidance where these are used in lieu of identifying specific sites, as no housing growth is attributed to them in the plan.
- 5.1.2 The rationale for including these locations is to provide absolute transparency for residents and stakeholders of our intention to look further at these when planning for additional growth as part of the partial plan review.
- 5.1.3 Identified land for Future Growth for the purposes of this Local Plan comprises areas which may be required to serve development needs in the longer term beyond the plan period or potentially at an earlier point in time if the wider context changes. These areas have a basic technical capacity, but no housing numbers have been attributed to them and therefore they do not contribute to the Plan target of 39,350 as a 'Broad Location' would.
- 5.1.4 These were strategic scale areas of land that progressed as growth location options in Regulation 18 and through much of the technical site assessment process as set out in the SHLAA up until the final stages when due to specific uncertainties set out in question 3, it was considered that the sites were not suitable or deliverable at this stage. In terms of assessment in relation to deliverability, is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for development. This is because not all sites considered in the assessment will be suitable for development (e.g. because of policy constraints or if they are unviable). It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.

Question 2:

What status do the sites in Appendix 7 have? Is it the intention to remove the sites from the Green Belt (where applicable)? If so, do the exceptional circumstances, as required by paragraphs 79-86 of the Framework, exist to justify the proposed revisions?

- 5.2.1 It was agreed in EXAM3 (Qu.12) that there was an inconsistency in identifying these locations for future growth spatially on the Policy Maps due to the fact that they are not linked to a policy and appear only in the supporting text. It has therefore been proposed that any future revision will remove them and just retain Appendix 7 of The Local Plan for reference.
- 5.2.2 While they are important in providing a full picture of growth potential in Central Bedfordshire, they have no formal policy status in the Local Plan and therefore there is no intention to consider altering Green Belt boundaries to include them. For reference, the only one of these sites that falls within the Green Belt and would therefore require changes to the boundaries, is Land West of Luton, but there is no intention nor requirement for this as no allocation has been proposed.

Question 3:

Paragraph 7.9.4 states that “...subject to further assessment [the land] could fulfil its purpose of meeting possible longer-term development needs”. What are the possible longer-term development needs, and what assessments have been carried out to determine the deliverability of the sites? Are they justified?

- 5.3.1 It is not possible or appropriate to quantify the long-term development needs at this time, but the response to Matter 2, Issue 7, Qu. 1 seeks to establish the context within which these will be determined by technical evidence and public consultation through future strategic planning work.
- 5.3.2 The ‘Identified Areas for Future Growth’ have been through the same technical site assessment as those that have been allocated in the Plan and as a result of this it was considered that they had sufficient potential to be identified in the Plan with the limited status as defined in question 2. In view of the fact that they are not allocations, a detailed assessment of deliverability has not been required. In fact, the Plan makes clear that there are currently a number of significant uncertainties that make allocation less certain at this stage.

- 5.3.3 Essentially there is currently insufficient technical evidence and/or supporting infrastructure to support allocation but there is significant potential based on their location and Central Bedfordshire's position right at the centre of the Oxford Cambridge Growth Corridor.
- 5.3.4 The identified land thus responds to proposals for future strategic infrastructure delivery; namely the realignment of the A1 or significant improvements through Central Bedfordshire, East West Rail, the Expressway and the expansion of Luton Airport. In each case these are either expected to enable development or in other cases they may mean that development is not feasible in a location due to the sterilisation of the land by the route of the infrastructure. All locations however based on initial technical assessment have potential for future development.

Central Bedfordshire Council Technical Assessment of Transport Proposals for West of Luton

Matter 4, Issue 1, Questions 3,
Appendix B

A great place to live and work.

CBC – Land West of Luton

PREPARED FOR:	Central Bedfordshire Council
PREPARED BY:	Graham Stevenson
DATE:	26 th July 2018
PROJECT NUMBER:	B2269D00
REVISION NO.:	1

Introduction

This Technical Note has been produced by Jacobs following a request from Central Bedfordshire Council (CBC) to provide strategic advice relating to a proposed residential led development known as Land West of Luton.

The proposed development is being promoted by Abbey Land Developments (ALD) for 4,600 dwellings, school and community facilities including some ancillary retail uses. The development lies both west of Luton and immediately west of the M1 motorway.

The proposed development is not allocated in the emergent CBC local plan which is currently being considered by an inspector at Examination in Public.

Mott MacDonald (MM) have been engaged by ALD and have produced a Transport Issues report which provides some of the context that the development proposal sits against.

CBC have expressed some initial concerns and we have ensured that we have covered these off as relevant. We have structured our comments against the sections of the MM note for clarity.

Context

- Whilst many of the principles set out in this section are laudable, none appear to raise to the challenge of providing adequate transport linkages given the constraints of this site (primarily the barrier presented by the M1).
- It is unclear how the development will sit alongside the existing villages predominately of Caddington and Slip End given their existing rural setting.

Trip Generation and Impacts

- Residential trip generation appears largely acceptable, albeit perhaps slightly on the low side and derived from an over-complicated methodology for the stage at which the development proposals are at.
- Primary school trip generation assumes:
 - That all pupils will come from within the development which given the proximity to other areas, and likely issues of under provision in existing schools is unlikely.
 - That all pupils will be walked to school. Whilst there may be no parking provision, this is unlikely to occur in practice and whilst many vehicular trips will be linked trips or primary internal trips, this may affect modal choice for journeys to work.
- Secondary school trip generation notes that some pupils will come from outside the development, but it is unclear what proportion. Again, no car trips for pupils are expected; again this is unlikely and especially so for pupils outside of the development.

- Whilst the employment element is only 5 hectares, the assumption that this will only generate ~8 trips in the peak periods seems incredibly unlikely, and that an error has been made in the calculations. This should be revised.
- Assumed Mode Share – whilst this is based somewhat on existing evidence (using Luton and CBC 2011 Census data), the areas chosen are quite large, diverse and as different from each other as they are to the application site; Luton is an urban area largely confined to the east of the M1, with a well defined road network and supporting PT whereas CBC is a mix of urban and rural areas, spread out across a wide area with access to differing transport corridors.

In particular the following assumptions are interesting:

- % of Working from Home is 4% higher than in Luton, to which this site would essentially form an urban extension, although we note that this is the direction of travel as set out in the revisions to the NPPF.
- The over doubling of the mode share for bus/coach seems significant, despite the Census comparisons being prior to the opening of the Luton-Dunstable guided busway.
- The % for car/van as driver seems un-ambitious – being at the same level as Luton. However, it could be seen that this results in a robust calculation.
- It would be useful for further detail to be provided on the % of external walking and cycling trips – whilst internal trips via these modes is expected, given the remoteness of the site these modes may not be realistic for trips to/from external attractors.

Walking and Cycling Links

MM propose a number of new connections for walking and cycling to connect the development to the existing urban area. Whilst the existing urban area is not remote from the proposed site it faces away from it, particularly given the presence of the M1. In addition, all of the proposed walking and cycling links have to cross under or over the M1 and all into relatively remote locations on its eastern side. It is likely therefore that these routes will be unattractive to many walkers/cyclists and so achieving such high mode share would appear very ambitious and unrealistic.

Bus Services

A range of new bus services have been proposed. Our comments on these are as follows:

- It is unclear whether any discussions have been held with operators to determine the feasibility of any of the options outlined, or whether the level of capital investment is possible in relation to the viability of the development.
- Access to the Luton – Dunstable busway, whilst a laudable aim is likely to be limited by available “paths” – utilising or diverting existing ones is likely to be a challenge especially given the increasing patronage that MM refer to.
- Whether the developer has access/control to the land east of the M1 that would be required to deliver any of the bus connections (or indeed pedestrian/cyclist connections).
- Whether the use of the existing underpass raises structural concerns, and safety concerns for pedestrians/cyclists using the link, even with the proposed guided busway section that is proposed. There would also be a need to consider the impact of any bridge strike on the operation of the M1.
- Whether there is sufficient highway capacity to offer the bus priority likely to be required in order to make journey times attractive.

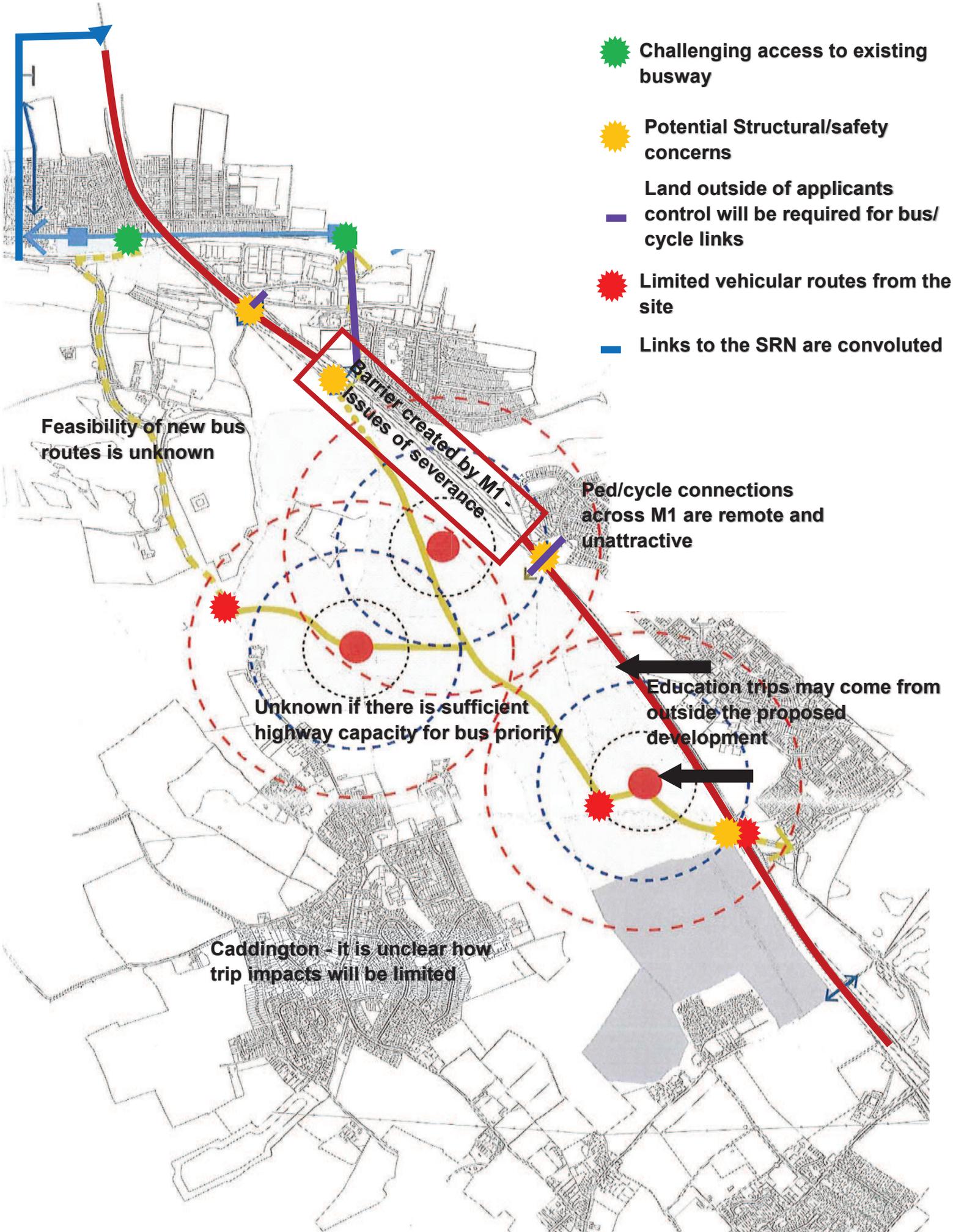
Highway Links

- It is unclear how vehicular traffic will be routed away from Caddington, whilst at the same time promoting sustainable modes as the main focus of the development.
- It would appear that there are only two vehicular routes out of the development, one to the north and one to the south. To the north, the junction onto the A505 is being already being improved by others, but it is unclear whether this has the capacity to accommodate the additional traffic generated. To the south, Luton Road is a relatively minor road which provides access for the village of Caddington into Luton. It is unclear whether this link is suitable, or desirable to take access from a major urban extension – in addition, the expansion plans for London Luton Airport (LLA) may increase trips via this route from the development, placing further pressure.
- Links to the SRN are somewhat convoluted – the M1 is realistically only via Junction 11 (which is a relatively compact and constrained junction) and although Junction 10a can be reached it is not by major routes. Access to the A5 is via Dunstable Town Centre which obviously will negatively impact here which is a concern especially given the de-trunking as a result of the North of Dunstable bypass.

Parking Standards

- Whilst we note that the development intends to comply with current CBC parking standards, it is unclear how this fits in with the aspiration to promote non-car modes and for the development to result in significant increases for sustainable modes.

Land West of Luton



Central Bedfordshire Local Plan

EXAM 41

SP1 Amendment

A great place to live and work.



Proposed wording amendments to Policy SP1 to identify which allocations within the local plan are meeting Luton’s unmet need.

1. Following on from the Hearing Sessions in relation to the Local Plan, the following wording is proposed to be included within Policy SP1: Growth Strategy.

The unmet housing needs of 7,350 homes arising from Luton will be delivered through a combination of the following sites:

- *North Houghton Regis (1&2)*
- *North of Luton*
- *Land at Luton Road, Barton le Clay*
- *Land East of Barton le Clay*
- *Caddington Park, Caddington*
- *Chapel Farm, Chalton*
- *Land West of the Midland Mainline Railway, Harlington*
- *Land West of Sundon Road, Harlington*
- *Land to the South West of the A5, Hockliffe*
- *Land at Leighton Road, Hockliffe*
- *A5 Watling Street, Hockliffe*
- *Land East of Leighton Road, Toddington*
- *Alma Farm, Toddington.*

2. The total number of dwellings that each site can deliver is detailed within Policy HA1, but for clarification are outlined below. This table shows that through a combination of these sites, the unmet housing needs of Luton can be met by 2031.

Site Reference	Site Name	Approximate Capacity to 2031
Policy SA5	North Houghton Regis (1&2)	4,818
Policy SA1	North of Luton	2,100
HAS04	Land at Luton Road, Barton le Clay	168
HAS05	Land East of Barton le Clay	498
HAS07	Caddington Park, Caddington	66
HAS09	Chapel Farm, Chalton	54
HAS20	Land West of the Midland Mainline Railway, Harlington	435
HAS21	Land West of Sundon Road, Harlington	154
HAS24	Land to the South West of the A5, Hockliffe	77
HAS25	Land at Leighton Road, Hockliffe	14-23*
HAS26	A5 Watling Street, Hockliffe	27-41*
HAS49	Land East of Leighton Road, Toddington	92

HAS50	Alma Farm, Toddington.	159
	Total	8,662 -8,685

* estimated capacity subject to change based on ongoing discussions with site promoters regarding flood risk.

3. The following amendments are also proposed to the supporting text and Policy HA1 within the local plan.

Local Plan section 6.7 - Small & Medium Sites

6.7.1 In addition to the Strategic Sites identified above, the Plan also allocates 52 small and medium sites for residential development. Ranging in size from 12 up to 650 dwellings, and spread throughout Central Bedfordshire, these can be brought forward for development more quickly than larger sites, and so aid delivery. These smaller sites will also provide better choice in the market, opportunities for SME builders, and enable our settlements to grow in ways that are sustainable, and respect and enhance the character and identity of our settlements and countryside. *A number of sites which will be released from the Green Belt and which sit within the Luton Housing Market Area, will also contribute in part towards meeting the unmet housing need from Luton. These include the delivery on sites up to 2031 at Barton le Clay, Hockliffe, Caddington, Chalton, Harlington and Toddington.*

Local Plan section 7.8 - Small and Medium Allocations

Policy HA1: Small and Medium Allocations

Sites identified on the proposals maps at Appendix 6 and listed in the table below are allocated for residential development.

Allocated sites to be released from the Green Belt that will contribute in part towards meeting the unmet housing need from Luton to 2031 are located at Barton le Clay, Hockliffe, Caddington, Chalton, Harlington and Toddington. These are identified within Policy SP1.

In addition to the general policy requirements of this Local Plan, development of these sites must take full account of the site-specific issues which are identified and set out on a site by site basis where relevant.

Examination of the Central Bedfordshire Local Plan

Inspectors: Matthew Birkinshaw BA(Hons) Msc MRTPI and

Helen Hockenhull BA(Hons) B.PI MRTPI

Programme Officer: Ian Kemp

idkemp@icloud.com

Andrew Davie
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Shefford
SG17 5TQ

30 September 2019

Dear Mr Davie,

Examination of the Central Bedfordshire Local Plan

1. As you will recall, during the recent examination hearing sessions we raised concerns regarding the soundness and legal compliance of the submitted Local Plan. We committed to providing detailed comments on the main issues in writing, which are set out below.

Sustainability Appraisal ('SA')

2. The Environmental Assessment of Plans and Programmes Regulations (2004) apply to this examination. The Regulations state that where an environmental assessment is required it should identify, describe and evaluate the likely significant effects of implementing the plan, and, reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. As the Planning Practice Guidance ('PPG')¹ confirms, the role of the SA is to make sure that proposals in the Plan are the most appropriate given the reasonable alternatives available.
3. One of the aims and objectives of the Central Bedfordshire Local Plan is to contribute towards the unmet housing needs from Luton. This is a positive and commendable strategy given the tightly drawn nature of Luton's urban area, which is bounded on all sides by the Green Belt.

¹ Paragraph: 001 Reference ID: 11-001-20140306 - the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement

4. A critical part of the strategy is Policy SA1, which allocates land for 4,000 dwellings to the north of Luton. Along with commitments at Houghton Regis North (Policy SA5), this represents one of the Plan's key sites for helping meet Luton's housing needs to 2031. A further 1,625 new homes are planned throughout surrounding towns and villages in the Luton Housing Market Area ('HMA') within Central Bedfordshire.
5. The January 2018 SA tests 5 Growth Scenarios. For 'Area A' (the area nearest Luton) the scenarios distribute housing to the North of Luton (Policy SA1), the Green Belt villages and a strategic site to the west of Luton. Land west of Luton has a longstanding history as a potential location for new housing.
6. However, the 4,000 dwellings allocated at North of Luton is a constant in all the growth scenarios. The only option where it is excluded is the 'No Development' scenario, which has zero growth for Area A. All the growth scenarios except the 'No Development' option also attribute at least 2,000 dwellings to the Green Belt villages. We therefore fail to see how the SA has adequately considered reasonable alternatives for Area A. Given that growth in Area A is so critical to the Plan's strategy for contributing towards Luton's unmet housing needs, we would expect the SA to thoroughly consider the alternatives available.
7. It is also unclear why the SA has used a capacity of 2,000 dwellings to consider land west of Luton. Representations put forward by the site promoters included provision for 5,500 dwellings, whilst the *Luton HMA Growth Options Study*² estimated a net capacity of 2,500 new homes over the Plan period. Without considering the full potential of the site it is difficult to see how the Council has concluded that Policy SA1 is the most appropriate strategy for expanding Luton.
8. Furthermore, a significant amount of additional information has been prepared and submitted following the start of the examination. In light of this evidence, the Council considers that Policy SA1 is now unsound and requests that the capacity of the site is reduced from 4,000 to 3,100 dwellings. Although a *SA Addendum Report*³ has been produced, it seeks to justify the allocations in the Plan and remove "...the uncertainties regarding significance from the previous SA". It does not consider whether the preferred strategy for Area A remains the most appropriate, compared with the reasonable alternatives, based on a reduced capacity of 3,100 homes.
9. In response to questions at the examination hearing session on Wednesday 12 June, the Council confirmed that the North of Luton allocation is derived from the *Land North of Luton and Sundon RFI Framework Plan*. The document was published in 2015 and includes a concept plan showing the alignment of the proposed M1-A6 link road. However, it does not form part of the statutory development plan for the area and has not been subject to any formal examination in public. Identification of the site in the Framework

² Examination Document C15

³ Examination Document EXAM7T

Plan does not remove the need to test alternative options adequately and objectively through the SA.

10. We also have concerns with the way in which the SA has considered alternative strategies for employment growth. One of the objectives of the Plan is to provide strategic warehousing sites to cater for 'footloose' demand in the logistics and distribution sector. Again, this is a positive response to substantial market demand along the M1/A1 corridors. However, the SA only tests 2 scenarios. They are based on the number of jobs expected to be provided from the allocations in the Plan with, and without, Policy SE1 – the Sundon Rail Freight Interchange ('RFI'). Whilst some alternatives (such as Stratton Business Park) have only come forward at Regulation 19 stage, they should still be considered in order to reach an informed decision on whether the strategy for economic growth is the most appropriate. This is especially important when the Plan is seeking to release land from the Green Belt, where the National Planning Policy Framework ('the Framework') requires that alterations to boundaries should only be made where there are exceptional circumstances. Some of the alternative sites for strategic warehousing being pursued by representors do not require land to be released from the Green Belt.
11. Aside from the consideration of reasonable alternatives, we also have concerns with the way in which the SA has concluded on some of the sustainability objectives, which have ultimately informed the Council's decision on which sites to allocate. For example, Holme Farm (Policy SE3) scores ++? for Sustainable Transport, with the SA stating that the site is located in close proximity to Biggleswade railway station and would reduce the need to travel for potential employees. However, the *Strategic Employment Site Assessment Technical Document*⁴ scored the site 'Red' for its proximity to public transport, concluding that the nearest bus stops are 1.3km away and the train station approximately 3km away. As discussed at the hearings, the main employment area would be accessed through the proposed services to the south of Biggleswade on the opposite side of the A1. It would not be conducive to walking and cycling. The Council also advised that strategic employment sites would typically attract workers from further afield, hence the reason why a jobs uplift has not been applied to the housing requirement. This is not consistent with the assessment in the SA.
12. Similarly, for the Marston Gate expansion (Policy SE2) the Site Assessment scores the allocation Red/Amber for landscape character. It suggests that there is some limited scope for development to the west, with farmland to the east and north forming an attractive open setting to the Greensand Ridge. In contrast, the SA scores the allocation + for landscape, with the potential for minor long-term positive effects.
13. We appreciate that the SA does not test sites to the same level of detail and is intended to provide an overview against a range of sustainability indicators. Issues such as landscape impact are also subjective. Nevertheless, such significant discrepancies only serve to undermine the robustness and objectivity of the process.

⁴ Examination Document F02

14. In conclusion therefore, the SA does not adequately demonstrate that the Plan is the most appropriate strategy when considered against the reasonable alternatives. It also contains unsupported conclusions against the sustainability objectives of two strategic sites. As a result, key parts of the Plan are not justified, and it thus fails the test of soundness in paragraph 182 of the Framework.
15. We return to the implications of this finding in our overall conclusion below. The remainder of this letter sets out our further concerns regarding the main issues raised during the examination, which are based on the four component areas of the Plan.

South Area

North of Luton – Policy SA1

16. In the previous section we outlined concerns regarding the assessment of reasonable alternatives to the North of Luton allocation as part of the SA. In addition, we also have specific concerns regarding the size and location of the allocation, which extends into the Chilterns Area of Outstanding Natural Beauty ('AONB').
17. At the hearings it was confirmed that the curved nature of the northern site boundary is based on the proposed alignment of the new M1-A6 link road. The provision of the link road is a requirement of Policy SA1(2) and would require major development in the AONB.
18. The 2012 Framework, which applies to this examination, is clear that great weight should be given to conserving the landscape and scenic beauty in AONBs. Along with National Parks and the Broads they have the highest status of protection in relation to landscape and scenic beauty.
19. Paragraph 116 of the 2012 Framework states that planning permission should be refused for major development in AONBs except in exceptional circumstances, and where it can be demonstrated that development would be in the public interest. In reaching this conclusion it is necessary to consider the cost of, and scope for, developing elsewhere outside the area or meeting the need in some other way. This is one of Natural England's primary objections to the Plan, namely; where is the evidence to suggest that the link road has to go through the AONB?
20. In justifying the alignment of the road we are referred to documents submitted in support of the current planning application. They demonstrate that several options have been considered, including routes outside the AONB. In summary, Route 6 was taken forward through the 2015 *Land North of Luton and Sundon RFI Framework Plan*. It states that the:

"...proposed route maximises the amount of developable land, in order to make sure that the right amount of development can be accommodated on the sites and ensures that the new homes, employment and community uses relate well and form a natural extension to the existing Luton area."

21. There are clearly several benefits to the proposed alignment of the new road, which avoids Sundon Wood, creates a new defensible boundary to the Luton urban area and provides land sufficient to accommodate up to 4,000 new homes. But as we explored at the hearings, there are other options available to the Council in contributing towards the unmet housing need from Luton without requiring major development in the AONB. This includes the possibility of using sites in other locations or providing a smaller development without a link road. Based on the evidence provided these options have not been adequately tested as part of the Plan's preparation.
22. It has been brought to our attention by the Chilterns Conservation Board that on 11 September 2019 the Council resolved to grant planning permission for the link road subject to referral to the Secretary of State. Clearly matters have moved on quickly since the close of the hearing sessions in July. In responding to this letter, could the Council confirm that 1) the information from the Chilterns Conservation Board about the planning application is correct, 2) if the outstanding objections from Natural England and Highways England referred to at the examination have been resolved and 3) what bearing the Council considers that this position has in relation to the soundness of Policy SA1? In the event that planning permission is granted, then this could represent a material change in circumstances, and one which we may need to consider further through reconvened hearing sessions.

Sundon Rail Freight Interchange – Policy SE1

23. The proposed RFI at Sundon is dependent upon the new M1-A6 link road. The concerns identified above (i.e. the assessment of reasonable alternatives that do not require major development in the AONB) therefore have direct implications for Policy SE1. The reports referred to by the Council clearly show that a link road *could* be constructed outside the AONB.⁵
24. In addition to requiring major development in the AONB, Policy SE1 requires around 45 hectares of land to be removed from the Green Belt for the RFI and associated warehousing. Further justification for this has been provided in Examination Document EXAM25. From the evidence it is clear that the proposal would make a positive contribution towards the need for strategic warehousing along the M1 corridor and have substantial economic benefits. It is also estimated that based on 4 trains per day, the RFI would remove around 160 daily HGV movements from the highways network. Situated at a point where the M1 and the Midland Mainline converge, the site is ideally located for such a development.
25. Nevertheless, the Framework is clear that the Government attaches great importance to Green Belts, the fundamental aim of which is to prevent urban sprawl by keeping land permanently open. Once established, Green Belt boundaries should only be altered in exceptional circumstances.

⁵ Examination Documents EXAM51-EXAM55

26. Our primary concern is the absence of robust evidence to justify the exceptional circumstances necessary to alter the Green Belt boundary at Sundon. As already established, the demand for warehousing and logistics in Central Bedfordshire is 'footloose', with operators looking for premises along the M1 corridor, not all of which is within the Green Belt. EXAM25 also confirms that operators will typically look for sites with a distance of up to 3km between an interchange and the strategic road network. We are therefore not currently persuaded that this is the only realistic location for a development of this type to serve the wider Luton/Dunstable/Houghton Regis conurbation.
27. In response the Council suggests that there are no alternative sites which have been put forward outside, or within the Green Belt, which have any reasonable prospect of use as a rail freight interchange. But this is a relatively specialist form of development, which is unlikely to have been put forward by land owners responding to a Call for Sites exercise. There is also nothing to suggest that the Council assessed the suitability of potential employment sites for such uses when carrying out the *Strategic Employment Site Assessment Technical Document*. Nor has a wider site assessment seemingly been pursued through discussions with neighbouring authorities, given that such a facility will not just serve the Luton area. At this moment in time there is insufficient evidence to justify releasing a further 45 hectares of land from the Green Belt, in addition to the 20 hectares of employment land from the Green Belt under Policy SA1, which would only be a short distance away.

Green Belt Villages

Harlington

28. Policy HA1 seeks to remove over 18 hectares of land from the Green Belt to the west of Harlington for 435 dwellings (Site HAS20). Prior to the hearings, the Council acknowledged that, in order to facilitate the allocation, a new primary school is also required. The Matter 7 Statement therefore seeks to enlarge the site and release more land from the Green Belt on Westoning Road.
29. The additional area of land has not been assessed as part of the *Central Bedfordshire Green Belt Study (Stage 3)*,⁶ nor through the SA process. In fact, the allocation was actually reduced in size from that submitted through the Call for Sites exercise. Examination Document EXAM5BB Annex 27 confirms that "*The western portion of the site is an illogical extension to Harlington and extends the settlement too far west...Therefore the site has been portioned to only include the eastern portion*". The additional parcel of land would go beyond the existing field boundary, which is clearly demarcated by landscaping. It would extend the settlement further west and create an arbitrary boundary which the Council previously sought to avoid.

⁶ Examination Document C11

30. At the hearings it was suggested that the allocation could be modified to include the primary school *within* the submitted site boundary. There are two issues with this approach.
31. Firstly, accommodating a new primary school with associated play areas and pitches would reduce the yield of the proposed residential development. At this stage it is unclear what the scale of any reduction would be. If significant, the Council would have to reconsider the benefits that the allocation would deliver against the harm to the Green Belt.
32. Secondly, without releasing more land from the Green Belt, access to the site, and therefore the school, would have to be taken from Toddington Road. This would require children, and parents with pushchairs, having to use the narrow footpath over the railway bridge and cross the road on a sharp bend at the junction of Toddington Road and the entrance to the station car park. Having seen the site, we agree with representations put to us that this would significantly increase the risk of accidents occurring, especially during the morning and afternoon peaks when the car park entrance is likely to be in frequent use by commuters using the station. It is difficult to see how appropriate highway improvements could be made to maintain pedestrian safety.
33. In the absence of additional school places, the allocation is therefore unsound and would result in residents with young children having to travel further afield to meet their day-to-day needs. Unfortunately, the Council's suggested changes would not be justified due to the harm that would be caused to the landscape character of the area and/or highway safety.

Barton-le-Clay

34. Land at Luton Road (Site HAS04) is subject to a long-term lease with Barton-le-Clay Parish Council. The Parish Council would have to relinquish that lease to bring the site forward for housing.
35. The position of the Parish Council at the hearing session was clear – it objects to the scale of development proposed in the village and does not support the cumulative growth from HAS04 and HAS05. There is nothing to suggest that the Parish Council has any intention of relinquishing the lease, which would have to be subject to a vote by Members at a public meeting. The site is therefore not considered to be deliverable within five years and there is no clear evidence that it would become so at any stage over the plan period.

Chalton

36. The *Central Bedfordshire & Luton Green Belt Study (Stage 1&2)*⁷ assessed the character of Chalton and concluded that it maintains a sense of openness. As a result, it recommended that the village continues to be washed over by the Green Belt. This is consistent with paragraph 86 of the Framework, which states that if it is necessary to prevent development in a

⁷ Examination Document C10

village because of the important contribution that its open character makes to openness, the village should be included in the Green Belt.

37. Allocating land for 54 dwellings in Chalton is directly at odds with the Green Belt Study. It is also contrary to the Plan's strategy which states that new homes are proposed *"...in the form of highly sustainable extensions of a more moderate scale to large towns and villages that are inset into the Green Belt."* As the Stage 3 Green Belt Study found, the lack of distinction between the inset allocation and the remainder of the village would also weaken its status as a washed over village and weaken the remaining Green Belt boundary. The exceptional circumstances necessary to justify releasing HAS09 from the Green Belt have not been demonstrated, and the allocation should be deleted from the Plan.

Hockliffe

38. The Council's Matter 7 Statement confirms that sites HAS25 and HAS26 are subject to additional modelling work to determine the extent of the previously identified flood risk. On the day of the hearing it was reported that as a result of the additional modelling the capacity of both sites will need to be reduced.
39. This additional work would need to be published, consulted on and examined so that other developers and members of the local community can understand the reasons for allocating these sites over others with a lower risk of flooding. Without knowing what each site can deliver it is also impossible to reach a conclusion that the exceptional circumstances exist to justify their release from the Green Belt, especially if the number of homes is going to be significantly reduced.
40. Elsewhere in Hockliffe site HAS24 is an allocation which the Council has reduced in size from that submitted as part of the Call for Sites exercise. But it is difficult to understand what the revised site boundary is based on. The allocation extends beyond the footprint of the village and follows no physical features on the ground. This is contrary to paragraph 85 of the Framework which states that Green Belt boundaries should be defined clearly, using physical features that are readily recognisable. The L-shaped site would also be at odds with the linear form and character of Hockliffe. Further justification would therefore be required to demonstrate that the allocation meets the requirements of the Framework and would not lead to an uncharacteristic form of development that would be harmful to the character and appearance of the area.

East-West Area

M1 Junction 13

41. The *Transport Modelling Stage 1C & 1D Report*⁸ identifies 25 'hot spots' on the highway network. Each one has been scored based on the number of

⁸ Examination Document C26

users likely to be affected and the level of stress or junction delay experienced.

42. Hotspot 10A is located at Junction 13 of the M1. Based on committed growth to 2025 it scores 9/10, with 10 being the highest scale of impact. This increases to 10/10 by 2035. Even without the growth proposed in the Local Plan, the already heavily congested junction is therefore going to get worse.
43. Examination Document C28 includes details of junction improvements that could be carried out to accommodate the additional growth proposed. The works are expected to cost between £2.5-£5m and would not undermine the viability of strategic allocations at Marston Vale (Policy SA2) or Marston Gate (Policy SE2).
44. However, Examination Document C28 confirms that further work has been commissioned to understand the cumulative impact on Junction 13 from growth in Central Bedfordshire, Milton Keynes and Bedford. Paragraph 8.8 confirms that "*...the outcome of this study may result in alternative options to the one discussed in this report.*" The previous Inspector, Mr Hayden, raised concerns in September and October 2018⁹ regarding the considerable degree of uncertainty arising from the need for further studies.
45. In response the Council has helpfully provided a Statement of Common Ground with Highways England.¹⁰ But this only reiterates that "*...additional work will be undertaken to further explore mitigation schemes necessary in relation to the SRN to deliver the proposed level of growth in the CBLP*". It confirms that the Councils are working with Highways England to undertake the modelling, and that it will set out the relevant improvements, including likely costs.
46. The latest update indicates that the additional modelling is now expected by late autumn. Whilst the Council and Highways England consider that this work should not delay adoption of the Plan, it is clearly going to form a critical piece of evidence which directly relates to the location of the Plan's largest allocation for up to 5,000 new homes at Marston Vale. In order to reach a robust, substantiated conclusion on the soundness of the Plan it would be necessary to consider the implications of the new evidence when it emerges and test it through further examination hearing sessions.
47. In the absence of this modelling we continue to have reservations about the cross-boundary impacts which have been identified. In particular, Examination Documents C24-C28 suggest that there will only be 'limited interactions' between the Marston Vale allocation and Milton Keynes via the A421, with less than 50 vehicle movements in the AM and PM peak. Although the Marston Vale allocation is intended to create new mixed-use development, and therefore reduce the need to travel, it is ideally placed for accessing Milton Keynes along the A421. In the context of an allocation for up to 5,000 new homes, we fail to see how the evidence is an accurate

⁹ Examination Documents EXAM4 and EXAM6

¹⁰ Examination Document 7R

reflection of likely future transport patterns. If, as the Council suggests, motorists will choose other routes, such as Salford Road instead of the A421, then this needs to be justified, and the impacts tested.

48. In summary therefore, given the already high levels of congestion around Junction 13, and the planned level of growth nearby, the modelling is critical to understanding whether improvements can be undertaken that effectively mitigate the impact of additional development in this location.

Marston Gate – Policy SE2

49. Most of the allocation is relatively flat running parallel to the M1 and the A507 before the land rises up to the north and east. The change in topography reflects the site's proximity to the Greensand Ridge, which runs south-east to north-west through this part of Central Bedfordshire.
50. The majority of the site is within the 'Salford-Aspley Clay Vale' Landscape Character Area, as defined by the *Landscape Character Assessment*.¹¹ One of the key characteristics of this area is the low-lying, flat landform, which is bordered by the pronounced, elevated landscape of the Greensand Ridge. The location of the site at the foot of the Greensand Ridge is especially prominent when viewed from parts of the John Bunyan Trail and Greensand Ridge Walk.
51. The Landscape Character Assessment sets out guidelines for new development. Amongst others this includes safeguarding the open land at the foot of the ridge to provide for its setting, conserving the clear views and relationship with the Greensand Ridge Character Area and ensuring that any growth of business parks does not further dilute the rural character of the area.
52. The strategic warehousing proposed under Policy SE2 would be viewed alongside the existing business park and the infrastructure associated with the M1/A507. However, due to the topography of the site, its prominence and the size and type of development proposed, the allocation would have a significant visual impact from the surrounding network of public footpaths. Situated on rising ground at the foot of the Greensand Ridge its appearance would be harmful to one of the defining landscape characteristics of the area. Similar views were expressed by the Council's Landscape Officer in Examination Document F02, finding that the farmland to the east and north forms an attractive setting to the Greensand Ridge.
53. Given the size of buildings proposed, the visual impact of the allocation would not be mitigated by additional landscaping. Although it would bring about significant economic benefits, in its current form, the extent of the allocation under Policy SE2 is not justified due to the harm that would be caused to the landscape character of the area.

¹¹ Examination Documents EXAM 56 – EXAM68

Aspley Guise Allocation – Site HAS03

54. The *Green Belt Topic Paper*¹² sets out the justification for releasing land from the Green Belt. Aside from contributing towards Luton’s unmet housing needs, the main reason is to provide additional housing for the southern half of Central Bedfordshire in locations where growth will secure the sustainable future of settlements.
55. Aspley Guise is on the northernmost periphery of the Green Belt close to the boundary with Milton Keynes. It is not within the Luton HMA. New housing in this location will therefore not help to address Luton’s unmet needs. Nor is there any evidence to suggest that the site is needed to help support local facilities. Significant new development in addition to site HAS08 is proposed around Aspley Guise, in Central Bedfordshire and in Milton Keynes. As such, we fail to see how the exceptional circumstances exist to release land from the Green Belt for an additional 37 new homes in this location. The allocation is not justified and should be deleted from the Plan.

Central Area

Former RAF Base, Henlow – Policy SE4

56. The submitted Plan allocates 85 hectares of land at RAF Henlow for specialist high-technology, science and research and development uses. A further 45 hectares is allocated for a mixed-use ‘visitor-economy and residential scheme’. The Council has previously confirmed that the residential element would be up to 500 dwellings.
57. In response to the *Inspectors’ Matters, Issues and Questions* the Council conceded that there is no need for the type and scale of development proposed in Policy SE4. The policy is therefore not justified and should be deleted from the Plan.
58. At the hearings it was suggested that the Council’s preferred way forward was to consider the site as part of a Review, envisaged to start within 6 months of adoption. Chapter 5.5 of the Plan states that an early review will be necessary due to the Cambridge-Milton Keynes-Oxford Arc and the new East-West railway line.
59. However, the preferred route of East-West Rail from Bedford to Cambridge has not yet been determined, and no coordinated analysis has been published to consider the best location for any new or expanded settlements as part of the Cambridge-Milton Keynes-Oxford Arc. Furthermore, as and when details do emerge, Examination Document EXAM12 confirms that the Council will undertake a fresh Call for Sites exercise with options assessed to determine an appropriate strategy. Further discussions are also going to be required as part of the Duty to Cooperate, with the revised Plan subject to Examination in Public. Determining the scale and distribution of any additional growth is therefore not going to be a straightforward exercise and it could take several years before a revised Plan is in place.

¹² Examination Document C12

60. The Ministry of Defence intends to start the phased vacation of RAF Henlow next year, with the site fully vacated by 2023. Homes England have entered into a Partnering Arrangement with the Defence Infrastructure Organisation ('DIO') and is working towards redeveloping the site alongside its phased closure. Postponing a decision on the future of RAF Henlow until the future strategy of the next Plan has been determined therefore risks the site becoming vacant with no positive strategy for its future reuse.
61. The need to plan positively for the future of the site is important due to the presence of MBDA UK Limited. MBDA is a missile systems provider to the Ministry of Defence which is estimated to have contributed £600m to the UK economy since 2010. It has operated from Henlow for over 40 years and has recently made a significant investment in the future of its operations, with on-going work planned over the next 2-3 years.
62. As we heard at the examination hearing sessions, MBDA must operate under licence from the Health and Safety Executive ('HSE'). The classification of the adjacent A600 as a 'minor road' (less than 10,000 vehicle movements per day) permits MBDA to operate under a particular set of safety distances. Increasing traffic levels above 10,000 vehicle movements could result in the reclassification of the road and require greater distances to be achieved. This would inevitably affect the operation of the business. The presence of MBDA will also affect the development potential of the former airfield.
63. Planning for the future reuse of RAF Henlow would therefore not only provide clarity to key stakeholders, but also ensure that the relationship with MBDA can be accounted for as part of comprehensive plans for the area. There are also other considerations that need to be taken into account, such as the reuse of the listed hangers and what happens to the large grass airfield. This is best achieved through the Local Plan process in consultation with the local community. We return to this issue below, in our overall conclusions on the most appropriate way forward for the examination.

A1 Corridor

East of Arlesey – Policy SA3

64. The *Settlement Capacity Initial Study*¹³ concludes that Arlesey has Medium-High capacity for growth and that development could contribute to the enhancement of new services and facilities. Development to the east of the town also allows for the provision of a new link-road to relieve congestion on High Street. In principle therefore, the strategy of extending Arlesey is appropriate.
65. However, Arlesey is 'Minor Service Centre' with roughly 2,470 dwellings. In contrast, Policy SA3 allocates up to 2,000 dwellings on over 200 hectares of land. A further 1,000 dwellings are also committed on land to the north of Policy SA3, with around 90 dwellings proposed on land off High Street. In total, the level of growth planned for Arlesey would more than double the size of the town. We therefore fail to understand how Policy SA3 would meet

¹³ Examination Document C42

one of the Plan's Key Spatial Objectives to grow existing communities across Central Bedfordshire "...*proportionate to their scale and environment context*".

66. Furthermore, due to its size, Policy SA3 extends all the way up to Fairfield to the east. With the exception of a single, square parcel of land, the settlement boundaries of Arlesey and Fairfield would coalesce and adjoin one another. Although Policy SA3 requires the provision of a country park to provide some separation, formalising the use of the open space between Arlesey and Fairfield would be very different to the existing situation, with the two urban areas separated by fields. There is a risk that the country park could become actively used as an open space linking Fairfield and Arlesey, not separating them.
67. In summary therefore, we have concerns regarding the level of growth proposed in Arlesey and the effect that this would have on its character, identity and potential for visual and physical coalescence with Fairfield. As submitted, the scale and location of development is not justified.

Holme Farm – Policy SE3

68. The proposed allocation to the south of Biggleswade and to the west of the A1 effectively comprises two separate sites connected by a narrow access road. Despite following land ownerships, it results in a very contrived boundary that would create two separate sites lacking any real integration.
69. The northern section of the allocation is reasonably well related to Biggleswade. It would be viewed in the context of the existing industrial buildings on Stratton Business Park to the east and the wind farm to the south and west of the site.
70. In contrast, the remainder of the allocation would spread a significant distance to the south of the town, extending the main built-up area of Biggleswade with linear development adjacent to the motorway. The size, shape and location of the allocation would result in a visually prominent development that would fail to integrate with the form and character of Biggleswade, which is almost entirely concentrated to the east of the A1.
71. Similar concerns were identified in the Council's assessment of the site in Examination Document F02. It found that there would be some limited scope for mid-scale development at the northern end of the site, but that warehousing would be inappropriate as it would block extensive views and create a sense of enclosure at a gateway to Biggleswade. When travelling north along the A1 the topography of the area affords wide-ranging views over the arable land to the west of Biggleswade. This would become dominated by strategic warehousing that would appear divorced from any other forms of intensive commercial development in this location.
72. The Site Assessment concluded by stating that the site "...*is large enough that with appropriate mitigation, the issues can be overcome.*" Although the allocation in the submitted Plan is smaller, the reduction in size has not overcome the issue of strategic warehousing blocking extensive views over

the vale landscape and creating a sense of enclosure on the approach to Biggleswade. Given the likely size of strategic warehousing, it would be very difficult to effectively screen the site by landscaping alone. In its current form Policy SE3 is therefore not justified due to its harmful impact on the landscape character of the area.

East of Biggleswade - Policy SA4

73. One of the criteria of Policy SA4 is that the development will form part of a sustainable village that will be visibly and physically separate from Biggleswade. The rationale behind this approach was to create a well-designed, standalone village with the potential to form part of a wider development in the future. Land to the east of Biggleswade is in Appendix 7 as an Identified Area for Future Growth.
74. However, for the reasons set out below, the Council considers that the 'Appendix 7 sites' are no longer justified and should be removed from the Plan. Without additional development to the east of Biggleswade Policy SA4 would effectively result in the creation of a small satellite village opposite an existing housing development separated by Baden Powell Way. As a result of deleting the area for future growth we fail to see how Policy SA4 would integrate successfully with the rest of the town. In addition, the second phase of development appears to form part of the assessment of the allocation in the SA. If this is no longer proposed, then the SA would have to be revisited in order to consider whether the strategy for Biggleswade remains the most appropriate one in the absence of any further planned growth.
75. It also remains unclear how strategic site SA4 will be accessed. The land is situated to the east of Baden Powell Way but the submission policies map illustrates the King's Reach development (HO8(8)) on both sides of the road. Whilst planning permission was granted in March 2019, the developers of King's Reach have confirmed that they own the land necessary to form the access and are not signatories to the relevant legal agreement. Based on the evidence provided the site cannot be considered deliverable until the ownership issues have been resolved.
76. In summary therefore, although the site now has planning permission, its inclusion as a strategic housing allocation for Biggleswade is not supported by the SA, which, as Policy SA4 does, assumes that further land to the east of Biggleswade will come forward as part of a wider, standalone settlement. There are also unanswered questions regarding how the site will be accessed. Further work would therefore be required to justify its inclusion as a strategic allocation in the Plan.

Identified Areas for Future Growth

77. The Identified Areas for Future Growth are included in Appendix 7 of the Plan and defined as sites which could meet possible longer-term development needs.

78. In contrast, the Council's updated position as set out in Examination Document EXAM12 accepts that there is insufficient evidence and/or supporting infrastructure to support their allocation at this moment in time. EXAM 12 also confirms that the sites are not given any preferred status through this Local Plan, and that future needs will be met through a new Call for Sites exercise to determine the most appropriate locations for growth.
79. If the Council's intention was to carry out a full review of development options once more details on East-West Rail and the Cambridge-Milton Keynes-Oxford Arc are known, then including the sites in Appendix 7 only serves to confuse decision-makers, developers and local communities. Without any corresponding policies the sites in Appendix 7 and the requirements of paragraph 7.9 are also ineffective. For these reasons, they should be deleted from the Plan.
80. As a consequence of deleting the identified Areas for Future Growth the corresponding sites designated as 'Important Countryside Gaps' (Policy SP5) are also unnecessary. Examination Document C22 describes how several of the gaps are intended to prevent coalescence between existing settlements and future growth locations. Because the future growth locations have not yet been determined, there is no justification for designating land to maintain any physical or visual separation from them. The implications of removing these sites are discussed below.

Conclusions and Next Steps

81. Our concerns with the submitted Plan fall into two main areas. Firstly, the SA has not adequately demonstrated that the spatial distribution of housing and employment is the most appropriate strategy given the reasonable alternatives available. There are also discrepancies with the scoring of sites which undermine its robustness as an objective assessment. Rectifying this issue would involve re-doing large parts of the SA with an open mind, and that could potentially lead to significant changes to the Plan.
82. Secondly, for the reasons given above, we have serious concerns regarding the soundness of several strategic allocations. Some of these issues are interrelated, such as the relationship between the Sundon RFI, the North of Luton allocation and the route of the new M1-A6 link road. Others require significant modification and/or the preparation of further evidence before they could be found sound.
83. In considering the most appropriate way forward we have had regard to James Brokenshire's letter of 18 June 2019, which reminds us about the importance of being pragmatic in getting plans in place that represent a sound plan for the authority. This is especially important for Central Bedfordshire, which currently does not have a single Local Plan for the area.
84. It is not inconceivable that the Council could spend the coming months considering the issues raised in this letter, producing additional information, carrying out a further SA and proposing more changes to the Plan. However, reaching this stage is going to require the preparation of a

substantial amount of new evidence which is likely to take a significant period of time.

85. To put this into context, this is a Plan that was submitted almost 18 months ago, and prior to the hearings starting already had a post-submission library with over 100 entries. The majority of this information was produced at the request of the previous Inspector, who raised concerns with some of the issues in this letter, such as the route of the M1-A6 link road and the need for highways modelling. At the hearing sessions participants raised serious concerns with how difficult it had become to follow the process given the volume of additional material, and the apparent way in which post-submission evidence sought to retrospectively justify the Plan's strategy. Following the examination must be even harder for local residents, especially when the Council is seeking changes on strategic issues mid-way through, such as the deletion of RAF Henlow, removing 900 homes from North of Luton, deleting Identified Areas for Future Growth and Important Countryside Gaps and making allocations larger to accommodate new or expanded schools.
86. Due to the scale and significance of the issues identified above it is also highly likely that this would require large parts of the examination to be re-run. Additional evidence would need to be made available and subject to full public consultation, alongside any changes that the Council consider necessary. We would then have to consider the representations made, publish additional Matters, Issues and Questions, invite written statements and hold further hearing sessions. If any further changes were required, this would then need to be subject to its own formal public consultation as Main Modifications to the Plan.
87. If the examination were suspended for a significant length of time, then it is likely that the objectively assessed need for housing ('OAN') would also have to be revisited. The OAN for housing in the *Luton & Central Bedfordshire Strategic Housing Market Assessment* (December 2017) ('SHMA')¹⁴ is based on a downward adjustment due to concerns regarding the accuracy of mid-year estimates and the resulting household projections. In the event that new national household projections had been published, any reconvened hearing sessions would have to consider whether the change was meaningful, as required by the PPG. There would also need to be a further assessment to see if the downward adjustments in the SHMA remained relevant.
88. Suspending the examination for a significant period is therefore not likely to represent an efficient or effective use of time or resources. It has the potential to delay, rather than accelerate the adoption of a Local Plan for Central Bedfordshire. Some of the decisions that need to be considered going forward, such as the future of RAF Henlow, are also more appropriate for the Council to take in consultation with local communities and interested parties, rather than recommended by ourselves.

¹⁴ Examination Document C36

89. Before deciding on the most appropriate way forward in seeking to address these concerns, we would be grateful for the Council 's comments on the status of the M1-A6 link road application, and the potential implications this has on the examination. In the event that the link road is granted planning permission, then this clearly has implications for future growth around Luton which will need to be discussed with participants. If the application is called-in for determination by the Secretary of State, then there are also potential implications for the timetable of the examination which will need to be considered.
90. In conclusion therefore, we would be grateful for the Council's clarification on the current position regarding the link road application, timescales going forward and the implications that this decision has for the examination in light of the concerns set out above.
91. We have asked the Programme Officer, Ian Kemp, to upload a copy of our letter to the website for those who are following the examination, but we are not seeking any comments from participants at this stage.

Yours Sincerely,

Matthew Birkinshaw and Helen Hockenfull

Inspectors
30 September 2019

Examination of the Central Bedfordshire Local Plan

Inspectors: Matthew Birkinshaw BA(Hons) Msc MRTPI and

Helen Hockenhull BA(Hons) B.PI MRTPI

Programme Officer: Ian Kemp

idkemp@icloud.com

Andrew Davie
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Shefford
SG17 5TQ

28 October 2019

Dear Mr Davie,

Examination of the Central Bedfordshire Local Plan

1. We write in response to your letter dated 14 October 2019, which seeks to address the points raised in our post-hearing correspondence dated 30 September 2019. The purpose of this letter is to address your concerns and identify the immediate actions required for the Council.

Disclosure of Information

2. The examination hearing sessions ended on 25 July 2019. During the hearings we discussed various matters, including the proposed M1-A6 link road. Our letter of 30 September 2019 sets out our concerns regarding the link road, namely the justification for taking the route through the Chilterns AONB given the alternative options available for new housing around Luton.
3. As we were finalising our letter, the Programme Officer received an email from the Chilterns Conservation Board indicating that the Council had resolved to approve planning permission for the link road. Given the importance of the road to strategic site allocations SA1 and SE1, this material change in circumstances could clearly have significant implications for the examination. However, we had not been made aware of the latest position by the Council. Our letter of 30 September 2019 therefore asked the Council to confirm the status of the planning application and advise what implications it has on the examination going forward. We await the Council's response on this point.
4. We also advised that in the event that planning permission is granted, then the implications for future growth around Luton would need to be discussed

with participants. Given the importance of the link road to the Plan's strategy this is an appropriate and reasonable approach to take.

5. The Council has raised concerns that correspondence from the Chilterns Conservation Board and Luton Borough Council could be seen as representations. However, apart from drawing our attention to the link road application, they only reiterate concerns that have been expressed previously. Both have now been added to the examination website. To be clear, our letter about the soundness of the Plan was based solely on our assessment of the evidence and the representations provided by participants at Regulation 19 stage, in hearing statements and the discussions at each hearing session.
6. In addition to the documents now added to the examination website, we have been sent copies of letters between Luton Borough Council and Central Bedfordshire Council regarding the link road planning application. However, these are not relevant to the examination of the Local Plan, are not representations and have been returned. As previously advised, the Programme Officer will receive many letters, emails and telephone calls during the course of an examination. The majority of these are procedural and are not forwarded onto the Local Planning Authority, other participants or posted on the examination website.

Way Forward

7. You have raised concerns that our letter of 30 September 2019 lacks clarity. We will therefore try to make the pertinent points clearer.
8. Firstly, our letter expresses some very serious concerns about the soundness of the Plan. In conclusion, we recognised that the Council could spend several months producing a new Sustainability Appraisal and additional information to address our concerns, but that this would result in a substantial amount of new evidence which is likely to take a significant period of time to complete. To put this into context, we noted that the examination has been running for almost 18 months and the previous Inspector had already allowed you the opportunity to produce substantial amounts of additional evidence to justify the Plan. For the reasons expressed in our letter, we therefore concluded that suspending the examination to allow you to provide further evidence to justify the Plan was not likely to represent an efficient or effective use of time or resources.
9. However, we did not reach a final conclusion on what should happen next because we wanted to first hear the Council's position on the link road. The penultimate paragraph of our letter, paragraph 90, asks for the Council's clarification on the application, timescales going forward and the implications that the decision to call-in the application (or not) would have for the examination in light of the identified concerns. When we have the Council's response on this, we will write again to outline our view on what should happen next.
10. In your letter dated 14 October 2019 you state that you will deal with various matters by way of update notes and that you intend to appoint new

independent consultants to revise the Sustainability Appraisal. Please note that we have not advised or instructed you to carry out any additional work at this stage because we have not reached any final conclusions about what should happen next. We would not wish for the Council to commit to carrying out work which may ultimately prove to be abortive.

Other Matters

11. We note that the Council has uploaded a 'Local Plan Update – Frequently Asked Questions' document to the examination website. Whilst the Local Planning Authority hosts the website, it is for the purpose of the Local Plan examination, which we have been appointed to carry out. Should you wish to upload further documents this should be communicated to the Programme Officer and ourselves first for our agreement.
12. The Local Plan Update asks 'Will more houses be needed than originally required', to which the answer given is 'No'. In response we would draw the Council's attention to paragraph 87 of our 30 September 2019 findings. Here we make it clear that if the examination were to be suspended for a significant length of time then it is likely that the objectively assessed need for housing may have to be revisited.
13. It is also noted that the Council's Local Plan October 2019 Statement (Examination Document EXAM78) suggests that no issues have been raised in relation to the plan's detailed policies. This is not correct. Throughout the hearing sessions Main Modifications to several policies were discussed and agreed in principle by yourselves. The purpose of our 30 September 2019 was not to list all of these in writing, but to highlight the 'main issues' for soundness which had not been agreed in the hearings.

Conclusion

14. We trust that this letter alleviates the Council's concerns regarding the evidence before the examination and helps focus attention on the principal issue which needs to be addressed immediately. When we have the information requested on the link road, we will consider whether it is feasible for the examination to continue in light of the concerns set out in our earlier letter, or, whether the most appropriate way forward would be for the Plan to be withdrawn.
15. We have asked the Programme Officer to upload this letter to the examination website for those who are following the examination, but we are not seeking any comments from participants at this stage.

Yours Sincerely,

Matthew Birkinshaw and Helen Hockenfull

Inspectors

Appendix 2: Luton HMA Growth Options Study analysis

A	B	C	D				E				F				G				H				I				J				K			
Potential Growth Location	Estimated net capacity to 2031 within Luton HMA boundary	In Green Belt?	% of site in areas of...							Pro-rated estimated capacity to 2031																								
			Non-Green Belt	Moderate harm to Green Belt	Relatively strong harm to Green Belt	Strong harm to Green Belt	Non-Green Belt	Moderate harm to Green Belt	Relatively strong harm to Green Belt	Strong harm to Green Belt	Non-Green Belt	Moderate harm to Green Belt	Relatively strong harm to Green Belt	Strong harm to Green Belt	Non-Green Belt	Moderate harm to Green Belt	Relatively strong harm to Green Belt	Strong harm to Green Belt																
L1	804	No	100%	0%	0%	0%	804	0	0	0																								
L2	521	No	100%	0%	0%	0%	521	0	0	0																								
L3	216	Part	71%	0%	29%	0%	153	0	63	0																								
L4	671	Yes	0%	0%	100%	0%	0	0	671	0																								
L5	1,500	Yes	0%	0%	29%	71%	0	0	435	1,065																								
L6	900	Yes	0%	0%	100%	0%	0	0	900	0																								
L7	648	Yes	0%	0%	100%	0%	0	0	648	0																								
L8	410	No	100%	0%	0%	0%	410	0	0	0																								
L9	240	No	100%	0%	0%	0%	240	0	0	0																								
L10	924	Part	34%	0%	0%	66%	314	0	0	610																								
L11	593	Yes	0%	0%	100%	0%	0	0	593	0																								
L12	1,500	Yes	0%	0%	90%	10%	0	0	1,350	150																								
L13	1,500	Yes	0%	21%	0%	79%	0	315	0	1,185																								
L14	263	Yes	0%	0%	0%	100%	0	0	0	263																								
L15	1,500	Yes	0%	28%	1%	71%	0	420	15	1,065																								
L16	120	Yes	0%	0%	3%	97%	0	0	4	116																								
L17	420	Yes	0%	0%	0%	100%	0	0	0	420																								
L18	720	Yes	0%	0%	0%	100%	0	0	0	720																								
L19	195	Yes	0%	0%	0%	100%	0	0	0	195																								
L20	2,000	Part	10%	0%	0%	90%	200	0	0	1,800																								
L21	900	Yes	0%	0%	0%	100%	0	0	0	900																								
L22	2,100	Yes	0%	0%	0%	100%	0	0	0	2,100																								
L23	330	Yes	0%	0%	0%	100%	0	0	0	330																								
L24	1,500	Yes	0%	12%	88%	0%	0	180	1,320	0																								
L25	368	Yes	0%	87%	0%	13%	0	320	0	48																								
L26	900	Yes	0%	100%	0%	0%	0	900	0	0																								
L27	669	Yes	0%	0%	94%	6%	0	0	629	40																								
L28	1,200	Yes	0%	0%	0%	100%	0	0	0	1,200																								
L29	411	Yes	0%	0%	100%	0%	0	0	411	0																								
L30	720	Part	15%	0%	0%	85%	108	0	0	612																								
L31	1,200	No	100%	0%	0%	0%	1,200	0	0	0																								
	25,943						3,950	2,135	7,039	12,819																								

Sources

Columns A&B

HOU7, Table 1

Columns C to G

HOU7, Appendix 5 (**Note:** De minimis non-Green Belt areas are not individually identified in this table but have been added to the next highest category of Green Belt found within the site to ensure totals sum to 100%)

Columns H to K

Column B pro-rated using percentages in Columns C to G

Appendix 3: Notes provided by Central Bedfordshire regarding housing provision within the Luton HMA, November 2019

- Note from Central Bedfordshire received 8 November 2019
- Note from Central Bedfordshire received 25 November 2019

Update Statement in Relation to Meeting Unmet Housing Need Arising from Luton, within Central Bedfordshire.

Central Bedfordshire Council received a letter from the Inspectors on 30th September 2019 and having considered its contents, the Council is comfortable that, subject to the additional work it suggests being undertaken and, main modifications, the Central Bedfordshire Local Plan is capable of being found sound. The Inspectors letter did not identify any significant concerns or issues in relation to a number of key areas including the overall housing and employment targets, Duty to Co-operate, the plan's detailed policies and many of the allocations proposed.

Central Bedfordshire Council is committed to delivering an adopted Local Plan, which meets the needs of not only Central Bedfordshire, but also provides the 7,350 homes that we have also committed to, in order to meet Luton Borough Council's unmet needs.

In relation to Luton's unmet housing need, the Council provided a note at the request of the Inspectors setting out where within Central Bedfordshire, Luton's needs would be met. EXAM 41 therefore sets out proposed amendments to Policy SP1 detailing the Green Belt settlements within the Luton HMA where the unmet need will be delivered. The note also identified that collectively, the sites identified would deliver up to 8,685 homes by 2031 which exceeds the required 7,350 to meet Luton unmet needs.

EXAM 41 -

<https://centralbedfordshire.app.box.com/s/43myiu8o561nxoe6hy7919n5aixvt5v4/file/507902495288>

In the letter dated 30th September, the Inspectors identified a small number of sites that they considered should not be allocated within the plan and therefore should be removed. Land at Luton Road, Barton le Clay, and Chapel Farm, Chalton which are identified within EXAM41 are unlikely to proceed within the plan and will therefore not contribute towards meeting Luton's unmet need. However, this does not affect the ability of Central Bedfordshire Council to fulfil our commitment to meeting Luton unmet need, and whilst we are in the process of considering the Inspectors letter in detail, we are confident that our commitments will be met in full.

Central Bedfordshire Council will continue to update our website in relation to details regarding the progression of the Central Bedfordshire local plan through to adoption.

**Meeting Luton's Unmet Housing Needs within Central Bedfordshire
Clarification Note for North Herts District Council's Local Plan Examination
November 2019.**

As previously identified within a note provided to NHDC, Central Bedfordshire Council remains committed to delivering the unmet housing need of 7,350 homes arising from Luton Borough, within the Luton HMA, close to the urban area.

The Plan period for the Central Bedfordshire Local Plan is 2015-2035 and the Luton and Central Bedfordshire SHMA update (July 2017) that informs the local plan, and which Luton Borough Council support, takes in to consideration all housing delivery within Central Bedfordshire and the Luton HMA up to the base date of 2015.

When seeking to deliver such significant levels of growth within a plan period, it is good practice to include a buffer (a surplus above the target), to reduce the risks associated with non-delivery and to allow for some level of contingency. This is essential to ensure the Central Bedfordshire local plan has a robust and sound supply of housing. A buffer has, therefore, been included for both Central Bedfordshire's needs and Luton's unmet housing need.

The buffer/surplus identified within EXAM 41 will ensure the unmet need arising from Luton Borough can be delivered and is not to meet Central Bedfordshire's objectively assessed needs.

When the Central Bedfordshire Local Plan was submitted for Examination, the buffer on the housing to meet Luton's unmet need was approximately 18%. However, due to the length of time the Examination has taken and the suggestion from the Inspectors that some of the sites identified within EXAM 41 (to meet Luton's unmet need) should be removed from the plan, the buffer is likely to be reduced to approximately 13%. Further, as Central Bedfordshire has determined to deliver the unmet needs once the plan is adopted, which is likely to be during autumn 2020, the Council have taken a pragmatic view that delivery of unmet need will not commence until early 2021. Therefore, as illustrated in the table below, the buffer is likely to decrease to approximately 5%.

Whilst this is a lower buffer, it is still clear that Central Bedfordshire's commitment, as agreed with all four authorities within the Luton HMA, to deliver 7,350 homes to meet unmet needs arising from Luton, will be met by 2031 within the HMA.

Luton HMA		
	To meet Luton's Unmet need 2011-2031	<i>To meet Luton's Unmet need 2011-2031 - to be delivered after adoption</i>
Commitments	4,818	4,233
Allocations	3,504	3,504
	8,322	7,737
	13% buffer on Luton's need	5% buffer on Luton's need

Appendix 4: Estimate of Luton HMA housing delivery within Central Bedfordshire 2011-2031

The following parishes / areas of Central Bedfordshire have been identified as falling within the Luton HMA as shown in Figure 38 of HOU2

Amphill	Flitwick	Stanbridge
Barton-le-Clay	Gravenhurst	Steppingley
Billington	Harlington	Streatley
Caddington	Hockliffe	Studham
Chalgrave	Houghton Regis	Sundon
Chalton	Hyde	Tilsworth
Clophill	Kensworth	Tingrith
Dunstable	Maulden*	Toddington
Eaton Bray	Millbrook	Totternhoe
Eggington	Pulloxhill	Westoning
Flitton & Greenfield	Silsoe	Whipsnade
	Slip End	

*HMA boundary runs through middle of parish. Whole parish figures included in this analysis

Housing completions in Luton HMA within Central Bedfordshire 2011-15

	2011/12	2012/13	2013/14	2014/15	Total 11-15
Ampthill	179	68	40	39	326
Barton-le-Clay	18	3	0	1	22
Billington	0	0	16	2	18
Caddington	25	1	8	0	34
Chalgrave	0	0	0	0	0
Chalton	0	0	0	0	0
Clophill	1	2	5	0	8
Dunstable	106	52	111	161	430
Eaton Bray	1	9	2	12	24
Eggington	0	0	1	0	1
Flitton & Greenfield	2	0	2	2	6
Flitwick	6	9	14	12	41
Gravenhurst	0	1	0	2	3
Harlington	1	0	1	12	14
Hockliffe	6	0	23	20	49
Houghton Regis	83	23	41	41	188
Hyde	0	0	0	0	0
Kensworth	0	1	5	0	6
Maulden	19	7	11	3	40
Millbrook	0	0	0	0	0
Pulloxhill	3	2	0	4	9
Silsoe	34	70	141	102	347
Slip End	0	-1	0	1	0
Stanbridge	1	1	7	-1	8
Steppingley	0	0	0	0	0
Streatley	1	0	0	1	2
Studham	1	0	-2	11	10
Sundon	0	0	0	0	0
Tilsworth	1	1	2	12	16
Tingrith	0	8	0	0	8
Toddington	0	10	2	11	23
Totternhoe	0	0	0	0	0
Westoning	2	0	3	0	5
Whipsnade	0	0	0	0	0
Totals	490	267	433	448	1638

All completions are taken as contributing towards Central Bedfordshire's own needs. No evidence has been submitted to the Central Bedfordshire examination suggesting that historic completions will contribute towards Luton's unmet need.

Source: Central Bedfordshire Authority Monitoring Report 2017/18, Appendix 8

Windfall allowances in Luton HMA within Central Bedfordshire

Source: April 2019 Housing Trajectory for Central Bedfordshire as attached to Matter 10 written statement

Area	Windfall allowance to 2031
Dunstable & Houghton Regis	535
Amphill, Flitwick and Maulden	133
Barton, Toddington and Harlington	49
Total	717

All windfalls in these areas are taken as contributing towards Central Bedfordshire's own needs. No evidence has been submitted to the Central Bedfordshire examination suggesting that windfall completions will contribute towards Luton's unmet need.

Housing commitments in Luton HMA within Central Bedfordshire

Source: April 2019 Housing Trajectory for Central Bedfordshire as attached to Matter 10 written statement

Trajectory ref	Policy No	Parish	Total delivery for 2015-2035 plan period (net)	Of which anticipated 2015-2031	Contributes towards C Beds own needs?	Notes
Allocated and large sites						
HT001	HA4	Ampthill	134	134	Yes	Possible error in C Beds trajectory? Says site will be complete in 2020 but does not include balance of 55 homes yet to be delivered. Included here.
HT001a	HA4	Ampthill	259	259	Yes	
HT002	HA5	Ampthill	38	38	Yes	
HT033	H1(19)	Caddington	0	0	Yes	
HT034	H1(19)	Caddington	50	50	Yes	
HT036	HA17	Clophill	9	9	Yes	
HT043	H1(2)	Dunstable	3	3	Yes	
HT044	H1(3)	Dunstable	0	0	Yes	
HT045	H1(4)	Dunstable	0	0	Yes	
HT046	H1(5)	Dunstable	0	0	Yes	
HT048	H1(8)	Dunstable	0	0	Yes	
HT052	MA2	Flitwick	400	400	Yes	
HT052a	MA2	Flitwick	15	15	Yes	
HT053	TC2	Flitwick	59	59	Yes	
HT057	-	Houghton Regis	4009	3009	No	Exam 41 identifies 4,818 units to be delivered from existing commitments here. A total of 4,838 units are shown. The residual 20 units are taken to contribute towards C Beds own needs for this exercise.
HT058	-	Houghton Regis	1489	1468	No	
HT058(I)	-	Houghton Regis	97	97	No	
HT058(II)	-	Houghton Regis	264	264	No	
HT058a	-	Houghton Regis	62	62	Yes	
HT060	-	Houghton Regis	169	169	Yes	
HT078	-	Leighton Buzzard	400	400	Yes	Estimate for Phase 2 reserved matters in Eggington parish as shown on developer website. Residential areas of Phase 3 are within Leighton Linslade parish (MK HMA) and have been excluded
HT078a	-	Leighton Buzzard	214	214	Yes	Within Eggington Parish but functionally MK HMA?
HT078b	-	Leighton Buzzard	162	162	Yes	Within Eggington Parish but functionally MK HMA?

Trajectory ref	Policy No	Parish	Total delivery for 2015-2035 plan period (net)	Of which anticipated 2015-2031	Contributes towards C Beds own needs?	Notes
HT078c	-	Leighton Buzzard	52	52	Yes	Within Eggington Parish but functionally MK HMA?
HT079	-	Leighton Buzzard	0	0	Yes	Listed as Leighton Buzzard and Eggington in Central Beds schedule but appears to lie wholly outside the parish / HMA boundary
HT079(i)	-	Leighton Buzzard	0	0	Yes	As above
HT080	-	Leighton Buzzard	270	270	Yes	Within Eggington Parish but functionally MK HMA?
HT088	HA24	Maulden	4	4	Yes	
HT100	MA9	Silsoe	110	110	Yes	
HT100a	-	Silsoe	23	23	Yes	
Large unallocated sites						
HT120II	-	Ampthill	30	30	Yes	
HT123	-	Caddington	201	201	Yes	
HT124	-	Caddington	113	113	Yes	
HT125	-	Caddington	50	50	Yes	
HT127	-	Maulden	17	17	Yes	
HT128	-	Dunstable	44	44	Yes	
HT128a	-	Dunstable	270	270	Yes	
HT129	-	Dunstable	240	240	Yes	
HT130	TC Mplan	Dunstable	0	0	Yes	
HT131	TC Mplan	Dunstable	0	0	Yes	
HT133	TC Mplan	Dunstable	0	0	Yes	
HT134	-	Dunstable	26	26	Yes	
HT134a	-	Dunstable	17	17	Yes	
HT134b	-	Dunstable	113	113	Yes	
HT134c	-	Dunstable	100	100	Yes	
HT134e	-	Dunstable	61	61	Yes	
HT134f	-	Dunstable	55	55	Yes	
HT134g	-	Dunstable	12	12	Yes	
HT136	-	Flitwick	125	125	Yes	
HT136a	-	Flitton & Greenfield	24	24	Yes	
HT137	-	Gravenhurst	24	24	Yes	
HT138	-	Harlington	44	44	Yes	

Trajectory ref	Policy No	Parish	Total delivery for 2015-2035 plan period (net)	Of which anticipated 2015-2031	Contributes towards C Beds own needs?	Notes
HT141a	-	Houghton Regis	30	30	Yes	
HT141b	-	Houghton Regis	35	35	Yes	
HT149I	-	Maulden	49	49	Yes	
HT152b	-	Silsoe	105	105	Yes	
HT153	-	Silsoe	23	23	Yes	
Small unallocated sites						
HT162	-	Chalgrave	10	10	Yes	
HT163	-	Dunstable	10	10	Yes	
HT165	-	Harlington	13	13	Yes	
HT166	-	Harlington	10	10	Yes	
HT168	-	Houghton Regis	12	12	Yes	
HT170	-	Silsoe	14	14	Yes	
HT200	-	Amphill	0	0	Yes	
Older persons accommodation						
HT204	-	Houghton Regis	135	135	Yes	
Totals				9283	4465	

MK HMA = Milton Keynes Housing Market Area

Proposed housing allocations in Luton HMA within Central Bedfordshire

Source: April 2019 Housing Trajectory for Central Bedfordshire as attached to Matter 10 written statement; Exam 41; Exam 69

Trajectory ref	Policy No	Parish	Total delivery for 2015-2035 plan period (net)	Of which anticipated 2015-2031	Notes	Revised anticipated delivery 2015-2031 (NHDC)	Meets C Beds own needs?
Local Plan strategic allocations							
HT205	SA1	North Luton	3,100	2,100	Identified in Exam 41 for Luton's needs	2,100	No
Small and medium allocations							
HT212	HAS04	Barton le Clay	168	168	Removed by Inspectors - undeliverable	0	No
HT213	HAS05	Barton le Clay	498	498	Identified in Exam 41 for Luton's needs	498	No
HT215	HAS07	Caddington	66	66	Included as 0 in M10 trajectory but included in Exam 41 for Luton's needs	66	No
HT217	HAS09	Chalton	54	54	Removed by Inspectors - unsound	0	No
HT223	HAS14	Eaton Bray	49	49		49	Yes
HT226	HAS17	Flitwick	216	216		216	Yes
HT228	HAS18	Flitwick	35	35		35	Yes
HT229	HAS19	Gravenhurst	39	39		39	Yes
HT230	HAS20	Harlington	435	435	Removed by Inspectors - unsound	0	No
HT231	HAS21	Harlington	154	154	Identified in Exam 41 for Luton's needs	154	No
HT234	HAS24	Hockliffe	77	77	Questioned by Inspectors but C Beds consider sound; Identified in Exam 41 for Luton's needs	77	No
HT235	HAS25	Hockliffe	23	23	As above	23	No
HT235	HAS26	Hockliffe	41	41	As above	41	No
HT238	HAS28	Houghton Regis	25	25		25	Yes
HT239	HAS29	Houghton Regis	355	105		105	Yes
HT246	HAS36	Maulden	21	21		21	Yes
HT247	HAS37	Maulden	25	25		25	Yes
HT248	HAS38	Maulden	39	39		39	Yes
HT259	HAS49	Toddington	92	92	Identified in Exam 41 for Luton's needs	92	No
HT260	HAS50	Toddington	159	159	Identified in Exam 41 for Luton's needs	159	No
HT261	HAS51	Westoning	135	135		135	Yes
HT262	HAS52	Westoning	85	85		85	Yes
Totals			4,641	4,641		3,984	774