



Campaign to Protect  
Rural England

CPRE Bedfordshire

CPRE Bedfordshire  
5 Grove Place  
Bedford  
MK40 3JJ

Telephone: 01234 353331  
Facsimile: 01234 353331  
Email: info@cprebeds.org.uk  
www.cprebeds.org.uk

Joint Technical Unit,  
Luton & South Bedfordshire Joint Committee,  
960 Capability Green,  
LUTON,  
LU1 3PE

5th June 2009

Dear Sirs,

### **Luton & Southern Bedfordshire Core Strategy: Preferred Options Consultation**

CPRE Bedfordshire Branch submits its comments on the Preferred Options document as follows:

#### **3. Vision & Objectives**

**Vision** We commend the Vision as stated, but have very deep concerns that it can ever be realised given the overwhelming scale of the housing and population growth proposed for an area whose infrastructure and countryside is already under stress.

The further expansion proposed for Leighton Buzzard, on top of the considerable growth already committed under the existing Local Plan, is hardly compatible with the vision of it as retaining its 'compact market town feel'. Only the town centre will remain 'compact', and as such will be unable to cope with the pressure of the combined southern and eastern urban extensions now committed or proposed for the town. We believe that these extensions, taken together, will produce a situation in Leighton Buzzard wholly at odds with the principles of sustainable development.

**Objectives** We applaud the reference at SO6 to 'distinctive' town centres, but this important theme receives no clear support in the document's Section 9, '*Improving Town Centres*', where, if anything, the proposals appear to point towards a bland uniformity.

SO7 talks of offering 'the highest level of protection' for the natural environment, but it is difficult to see how this worthy objective can be compatible with the scale of growth envisaged. On the contrary, proposals highly damaging to the natural environment are being actively promoted by the Strategy, notably the proposal to drive a dual-carriageway bypass through the Chilterns AONB north-east of Luton.

-2-

#### **4. Spatial Strategy**

**4.4.** The statement that 'the North Herts District LDF will progress the planning' of the directional growth proposed to the east of Luton appears to us highly questionable given the level of opposition known to exist in Hertfordshire to such a concept. The statement is surely no more than an aspirational recommendation.

**4.6** We note the admission here that expansion at Leighton Buzzard raises greater questions of sustainability than does expansion of the LDHR.

*Promoting and Protecting Bedfordshire's countryside for present and future generations*

**4.13/4.14** We agree that public transport improvement has to be at the heart of any sustainable development strategy, but unless these improvements are accompanied by positive deterrents to car use we believe the measures proposed at 4.14 will make no more than a marginal impact on traffic volume and congestion. The reference at 4.13 to ‘ensuring that private car accessibility is also adequately planned for’ is particularly concerning – is this intended to include access to town centres, and employment zones for which Green Travel Plans should be in place? There seems to be some equivocation here in the strategy to secure significant change in transport modal choice.

**4.27** Whilst appreciating the role of ‘critical mass’ in delivering supporting employment and community infrastructure, it concerns us that no consideration seems to have been given to the contribution to critical mass already in prospect from Leighton Buzzard’s planned Southern Urban Extension. It seems to us that an explanation needs to be given as to why the Southern Urban Extension is seen as insufficient to deliver improved employment opportunities and community infrastructure within the town, and why these objectives are considered achievable only through development of yet another urban extension to the east.

**4.34 – Spatial Development Principles** The concept of a ‘further strategic urban extension to the east of Luton’ is one with which we cannot agree. In our submission at the ‘Issues & Options’ stage, we demonstrated how modifications to Option 5 could enable the housing growth targets to be met without recourse to expansion either east or west of Luton. Also, whilst our submission did include an urban extension at Leighton Buzzard, this was confined to the brownfield quarryland area at the north east edge of the town and was for 2000 homes only. We cannot agree with any larger eastern extension at Leighton Buzzard, involving a push into green fields and into land south of Vandyke Road.

## **5. Accessibility and Transport**

**5.1/5.2** We absolutely agree that implementing sustainable transport alternatives to the car is crucial to delivery of the objectives of the Core Strategy, but consider this position is seriously compromised by the

-3-

unqualified statement at 5.2 that private car accessibility should also be adequately planned for. Public transport initiatives that are not supported by positive deterrents to car use for local journeys will not achieve the degree of modal switch required to make a significant impact on the level of future vehicle demand described at 5.16.

**5.6** The Joint Committee should be aware that the concept of a spine road to serve the eastern urban extension at Leighton Buzzard is not supported by the Government’s own advisory agency, CABE – see CABE letter dated 3<sup>rd</sup> February 2009 to South Bedfordshire District Council concerning the outline application for this area submitted by Arnold White Estates.

**5.17** Given our opposition to the concept of an East of Luton Urban Extension, it should be noted here that we also oppose the concept of an East Luton Bypass.

**5.28** We question the case for a Park & Ride facility at the A5/A505 junction given the high level of intrusive visual impact it will have at this location, and that of the 4 Park & Ride facilities proposed it has the least potential patronage.

**5.29/5.30** Because we oppose any urban extension or bypass development into North Herts it follows that we also oppose any Park & Ride facility on the A505 east of Luton in a location that is based on such developments taking place.

**5.34** We note the continuing support given in the Strategy to the concept of a Luton North Parkway rail station, but quite clearly this cannot realistically proceed if one or other of the existing well-located rail stations at Legrave and Harlington has to close. We consider that in

addition to a 'Parkway' -based transport strategy there has be a 'No Parkway' - based transport strategy as well.

**5.43** We note the Joint Committee's adoption of the 'Outer' route for extension of the Luton Northern Bypass to the A505, and the environmental mitigation proposed, but CPRE remains absolutely opposed to this alignment. This is destruction of protected AONB landscape on an unprecedented scale – not just the massive visual scar, but the despoilation of a much wider area of fine, tranquil countryside through the influx of all-pervading traffic noise.

We believe the Joint Committee is making a serious strategic mistake here – it is a proposal so damaging, so controversial and so costly that the chances of it ever actually materialising must be extremely low. We note also, at 5.45, that the work statutorily required to assess 'no-bypass' alternatives to the bypass extension has not yet been completed. We consider it highly unsatisfactory that the Joint Committee should commit to this bypass extension without the conclusions from such an assessment being available.

-4-

**5.44** Whilst extension of the Luton Northern Bypass to the A505 might reduce congestion in Luton, it is certain to increase it in Hitchin, a factor on which we have no doubt North Herts will adversely comment.

## **6. Providing New Homes**

**6.7** We note the emphasis placed by developers and landowners on the 'deliverability' of sites, but simply because sites are deliverable doesn't mean they are right in terms of a coherent and sustainable development strategy. It is vital that pressure from developers to move forward with particular sites just because they can offer relatively speedy delivery is strongly resisted.

**Table 6.4** it would have been helpful to see to what extent each of the 4 urban extension figures has been individually marked up to produce the 19,000 overall figure for planning purposes.

**6.25** The statement that 'delivery could start on the urban extensions to the east of Leighton Buzzard and/or the north of Luton in 2012/13, with the other two urban extensions to commence shortly after' is inconsistent with the statement in Section 4, *Spatial Strategy & Key Diagram* (Para. 4.6), that

'Priority will be given to the main conurbation before Leighton Buzzard and Linslade owing to its higher levels of existing and potential sustainability and to maximise the opportunities for new development to support and enable its regeneration'.

**6.28** We are not clear on the precise meaning of the sentence 'The Joint Committee will also identify a threshold figure below the housing targets which would trigger the need for additional sites to be allocated'. We assume the Submission version will provide clarification.

## **7. Our Economic & Employment Needs**

**7.3** We remain highly sceptical of the prospects for achieving the jobs growth target, especially given the proximity of Milton Keynes, which will have its own ambitious jobs growth agenda.

**7.5** The statement that accessibility and connectivity to other parts of the UK and Europe are principal competitive advantages for Luton and southern Bedfordshire could equally be applied to Milton Keynes, apart from the fact that Luton and southern Bedfordshire has closer proximity to Luton Airport. It seems to us, therefore, that the jobs growth potential for Luton and southern Bedfordshire in the transport and business services sectors may not be as robust as is being assumed.

-5-

**7.16** We believe that there are very serious issues to be addressed relating to the ability of Luton and southern Bedfordshire to support, in employment terms, the housing and population growth that has been laid down for the area. Frankly, we cannot subscribe to the view expressed in this paragraph that the jobs targets set out at Para. 7.3, whilst ‘ambitious’, are somehow at the same time ‘realistic’. We say that the Joint Committee should have raised much stronger concerns relating to the feasibility of these targets. The current economic downturn, and the fall-out affecting the motor manufacturing and aviation industries (both of key importance to this area) only serves to underline the vulnerability of local economies to events over which there is little local control. This points to the need for caution – not ambition – in assessing the potential for jobs growth in this area over the timespan of the Strategy.

**7.18** The proposal for a Warehousing & Distribution development at Sundon Quarry seems to have come ‘out of the blue’. We strongly oppose such a development at this location

(a) because it involves appropriating Green Belt outside the proposed alignment of the Luton Northern Bypass, which ought to form the ‘defensible’ future Green Belt boundary

(b) because of the inevitable impact on the adjoining SSSI, which in our view will not be capable of satisfactory mitigation

(c) because of inevitable impact on the adjoining County Wildlife Site, which again we say will not be capable of satisfactory mitigation.

## **11. Green Infrastructure & Space**

**11.5** Some greater definition and clarity would be helpful at the Submission stage as to the land boundaries associated with the proposed 60 acre ‘Chalk Arc’ country park.

## **12. Preserving and Enhancing our Countryside & Heritage**

**12.7** We consider the assertion in the ESA that, east of Luton, ‘development would be appropriate provided that sufficient mitigation measures were implemented’ to be totally without credibility, given that housing development would not only engulf existing settlements but would also entail a Luton Eastern Bypass intruding into the beauty and tranquillity of the Lilley Valley. No amount of ‘mitigation’ can possibly offset this kind of damage. We take this opportunity to re-state that we are absolutely opposed to any development in the east of Luton area.

-6-

**12.9** Preferred Option CS15 is profoundly unsatisfactory. Of the 3 bull-points listed, the first two are fundamentally inconsistent, in that one talks of ‘protection, conservation and enhancement’ and the other talks of ‘mitigation to reduce impact’. As for the third, this talks of

protecting, conserving and enhancing the Chilterns AONB, whilst elsewhere the Strategy promotes a dual-carriageway bypass straight through it.

If the Joint Committee is serious about protection etc. of our countryside, it needs to address the fundamental inconsistencies and inadequacies in its Preferred Option on the subject as presently drafted.

We trust our observations will be given careful consideration.

Yours sincerely,

Thurstan Adburgham,  
Luton & South Beds. Area Representative