

List of previously unidentified issues raised from the Issues and Options Core Strategy Consultation

Below is a list of issues raised by stakeholders, statutory consultees and the public in their response to consultation. These issues were previously unidentified in the Core Strategy. This list has been generated from analysis of detailed letters received. There are still a number of questionnaires to be analysed, however, the questionnaires are structured to ask questions on the issues already covered in the Core Strategy, so it is not anticipated that any new issues will arise. This list is intended to give members an indication of the general response to consultation. The Preferred Options paper will address many of the issues listed below.

Parish Council Responses

- Biodiversity
- Local distinctiveness in new development (high quality design)
- Drainage/flooding issues
- Use of shared facilities within developments such as schools and sport fields
- Creation of sustainable villages – maintain existing facilities

Statutory Consultee Responses

- Telecommunications infrastructure/development and policy
- Protection of existing community, cultural and leisure facilities in all town centres
- Definition of community facilities so that developers know what to include
- The importance of the agricultural/rural sector in the area – economic benefits, leisure activities and farm diversification
- Use of ecological assessments
- Biodiversity – protection and enhancement of
- Green infrastructure
- Flooding and drainage
- Climate change issues
- River restoration

Local Stakeholder Responses

- The importance of public houses and social clubs – should be included as part of community facilities
- Shortage of employment land within Leighton Linlade

- There should be greater acknowledgement of the Chilterns AONB in the document
- Provision for educational/training facilities in LL
- Provision for the expansion of Luton Airport and supporting businesses/uses
- Role of tourism in the area
- Social infrastructure needs of new and existing communities
- Biodiversity
- Importance of local markets
- Recognition of archaeological remains in the area
- Phasing of development - delivery

Statutory / National Stakeholders Responses

- Insufficient distinction between 2001-2021 figures, and uncommitted figures up to 2031 (St. Albans City & District, NHDC)
- Not compliant with MKSMSRS because of Area M (St. A C&D)
- Lack of information on other infrastructure, e.g. water supply, schools, other community facilities (St. A C&D)
- Aircraft noise impact on some areas (St. A C&D)
- Water pressure (Harpenden TC)
- Omission of landscape designations outside of Luton and South Bedfordshire (NHDC, Herts CC)
- Unsound because all studies and evidence base is only for Luton and South Beds – not the adjoining areas even though there are proposals in those areas (AVDC)
- Compensatory green belt provision not considered (AVDC)
- Insufficient evidence base to allow an informed decision about options (Herts CC)
- No mention of increased capacity through Thameslink 2000 (Herts CC)
- Impacts on development on wider transport network (Bucks CC)
- Extra-care housing for the elderly (Beds CC)
- Sterilisation of minerals reserves (Beds CC)
- Waste management issues (Beds CC)
- Economic development (Beds CC)
- Community cohesion (Beds CC)
- Climate change agenda and other environmental issues (Beds CC)
- Urban design (Beds CC)
- Green infrastructure (Beds CC)
- Improving neighbourhoods (Beds CC)
- Need for an employment strategy (LSP)
- Need for an integrated transport strategy (LSP)
- New station at Chalton/Sundon (LSP)
- Enhancing energy efficiency of existing homes/housing stock (LSP)
- Duties in relation to Section 40 of the Natural Environment and Rural Communities Act (LSP)
- Impact on SSSI etc sites of additional population (Natural England)

- Local hospital for Leighton Buzzard and Linslade (Andrew Selous)
- Flood defences not in place east of Leighton Buzzard (Andrew Selous)
- Water supply (Andrew Selous)
- Water network modelling, e.g. need to upgrade East Hyde Sewage Treatment Works, particularly for development north of Luton (Thames Water)
- Constraints placed on development in relation to timing of strategic infrastructure (Highways Agency)
- Use of Health Impact Assessments, Health Needs Assessments and Health Equality Audits (NHS PCT)
- Town centres hierarchy (DPP and Peacock & Smith)
- Renewable energy and BREEAM policies must be flexible to allow for viability and suitability (Peacock & Smith)
- Justification for the inclusion of some of the villages (Karderdale Ltd)

Public responses relating to North Hertfordshire

- Light and noise pollution will affect villages
- Additional pressure on already struggling services- i.e. water
- How can South Bedfordshire and Luton propose to build in North Herts?
- Options maps do not identify AONB, SSSI and AGLV in North Herts, so how can public comment on the proposals properly? The document ignores the significance of the natural beauty of the Lilley area.
- Developing immediately to the East of Luton would take away countryside and recreational space for the people of Luton and South Bedfordshire.
- Proposed Eastern Luton bypass would encourage an alternative to the M1, in turn, ruining the unspoilt countryside and biodiversity.
- Why are we ignoring the Green belt?

Public responses relating to overall development proposals

- Creating mixed communities is an unrealistic proposal, as generally, people feel more comfortable living amongst people of a similar social background.
- Most peoples daily journeys are so complicated that using public transport is impossible, unless it radically improves so it links up places of work, supermarkets, shops, schools and houses.
- Skilled work is limited locally; most people will still travel to major cities to pursue a career.
- The Core Strategy does not address water supply or sewerage provision.
- Options for development in areas I, J and L appear likely to result in road building through the Chilterns AONB
- Expansion of Houghton Regis is dependent on the A5-M1 link and would encourage private car use

- The vision states that we want to be a 'green growth area' but we are relying on the M1 and Luton Airport
- The final preferred option should be Areas C and D from option 8 but totalling 300 ha, Areas F and G from option 2 and area I from option 2.
- Area L would require North Herts to include it in their Core Strategy rather than the Luton and South Bedfordshire Core Strategy, so it seems an odd and undeliverable option
- Area M is not in accordance with policy 2a of the MKSMSRS

Public responses relating to Leighton Linlade

- Leighton Linlade areas C and D are development areas which can be delivered on time because they do not rely on the timely delivery of major transport schemes.
- The scope of essential local infrastructure which is currently missing in Leighton can only be delivered by developer funding.
- An eastern distributor road, funded by developers, would significantly ease town centre traffic problems.
- There is a shortage of employment sites in Leighton which limits economic activity in the town
- The town centre is underused and declining and there is a severe lack of local amenities.
- There are opportunities to utilise brown-field quarry and intensively farmed land for development to the east of Leighton without impacting on valuable countryside areas
- The many active and worked out sandpits around Leighton could offer significant potential for future development
- Please leave a corridor of countryside for the narrow gauge railway, it is an important historical site and tourist attraction, but no mention of it is made in the core strategy.

Submissions from landowners/ agents/ planning consultants

- Criticism of approach to look beyond the MKSMSRS areas of search and the resultant lack of compliance with the MKSMSRS.
- Critical of the scale of growth proposed in the options at Leighton Buzzard given MKSMSRS advice that it should take the residual that is left from Luton/Dunstable/Houghton Regis.
- Critical that the Vision refers to development North of Houghton Regis and the presumption this places on where development will go.
- Critical of the lack of robust evidence base, particularly in relation to the land take assumptions in Appendix 1 relating to urban capacity figures and land predicted for employment, community facilities and other infrastructure needs.
- Critical of lack of commitment and support for Luton Northern Bypass in the paper and the lack of discussion of the different options for the

stretch between the M1 and A6 and the implications of these different options on land take.

- Suggested that given the strategic importance of the Luton Northern Bypass that the Core Strategy should identify and work to achieving a policy framework which enables construction of the bypass (M1- A6) via developer funding.
- Critical of the lack of discussion of the Green Belt and the lack of evidence of a comprehensive Green Belt review or assessment of urban extensions against the criteria in PPG2.
- Critical of the lack of evidence and assessment of environmental qualities of the potential areas for development.
- Critical of the assumption that the commencement of development prior to the construction bypasses is premature.
- Critical of the lack of discussion in the paper of the potential to extend the guided bus way.
- Critical of the timescales for delivery of the LDF documents notably the Core Strategy and Site Allocations and the impact this has on the commencement of the first urban extension in 2009 given the lengthy lead times for large developments.
- Identified the importance of deliverability and the need to assess/ provide alternative options should delays continue or not be resolved.
- Suggested that small developments should be developed alongside large developments to ensure steady supply of housing.
- Identified the need to take account of the potential for small scale development in greenbelt under special circumstances
- Suggested that a vision and set of objectives for urban extension be developed.
- Raised concerns over the cost of sustainable construction targets and the impact on delivery if targets are raised too high too early.
- Need to address affordable housing in Core Strategy to ensure that land transactions fully take account of such matters and to allow public examination.
- Suggested a need higher employment land target
- Need to evaluate more fully all the transport options.
- Need to consider the potential and importance of village expansion more fully, particularly in relation to Draft RSS figure, the need to support facilities in villages and the contribution that such housing could make.
- Need HMA in advance of discussions on affordable housing.
- Needs to consider a mechanism for delivering redevelopment of housing areas in the urban areas.