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Proposed Response by Luton Borough Council – to the Luton and South Bedfordshire Joint Committee Core Strategy Preferred Options Paper – Consultation

Chapter 3 – The Vision and Objectives

| Do you support the Spatial Vision for Luton and Southern Bedfordshire? | |
|---|----|
| Yes | No |
| ✓ | |
| Why? | |
| <p>The vision is supported because it is in line with current Government guidance, also Regional and Sub Regional policy. The spatial vision strongly and clearly advocates the first principles of building sustainable communities by explicitly requiring development in the Luton, Dunstable and Houghton Regis conurbation to deliver a “Green Growth Area” (GGA). The GGA vision will therefore help with monitoring and reviewing progress in delivering sustainable development (e.g. via the sustainability appraisal and Annual Monitoring Report). The vision will help to ensure that growth isn't just about housing, but is also about creating successful mixed use communities, so that new urban extension communities are integrated in such a way that access is more sustainable.</p> <p>Importantly, the spatial vision also clearly recognises and expects each separate town and town centre within the conurbation to maintain a strong local function, character and identity. Securing economic regeneration and commercial development opportunities while also safeguarding and enhancing environmental strengths is important. This will help to foster social cohesiveness and prosperity. Furthermore, by advocating the delivery of sustainable transport solutions, which improve accessibility between town centres and the new urban extensions, and economic development opportunities, the vision will help to improve cohesiveness and prosperity across the conurbation.</p> <p>The GGA will enable the Core Strategy to address the Government's climate change programme, carbon reduction targets and the local contribution in terms of renewable and decentralised energy.</p> <p>Furthermore, the vision will assist implementation of design quality which must be at the heart of new development to ensure that sustainable principles and improving quality of life and robustness of the built environment and open spaces is secured.</p> <p>The vision takes the opportunity to emphasise the uniqueness of the area. The Luton Forum, Luton's Local Strategic Partnership (LSP) has had an opportunity to develop and support the vision. The LSP will no doubt wish to pursue a continuing role in developing the vision.</p> | |

| Do you support the Strategic Objectives for Luton and Southern Bedfordshire? | |
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| Yes | No |
| ✓ | |
| Why? | |
| <p>The Borough Council supports the menu of objectives – these objectives will be helpful in facilitating monitoring progress in terms of strategy delivery and can be supported through the setting of specific and measurable targets where appropriate e.g. climate change, emissions and renewable energy contributions. The evidence base to support the Core Strategy continues to be developed with further studies to establish indicator and baseline information which will allow specifying a quantifiable direction of travel. Evidence based Targets, by definition, will be more achievable and realistic.</p> | |

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We particularly value the inclusion of objectives relating to the integration of communities, and the aim to support both the existing and new communities, as it is important that growth areas are complemented by improvements to the existing areas of deprivation. Importantly, objectives will also support the need to secure design quality in new development and the enhancement and regeneration of existing areas, town centres and the public realm - including open spaces.

Chapter 4 – The Spatial Strategy & Key Diagram – where should growth happen?

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| Do you support the Spatial Development Principles? | |
| Yes | No |
| ✓ | |
| Why? | |
| <p>The principles are supported because they are in accord with Government, Regional and Sub Regional Spatial Policy, which places emphasis on maximising the development and regeneration potential of higher order urban areas by sequentially phasing development in the major conurbation, especially in the early period up to 2012.</p> <p>Also urban sequential development maximises the reuse and recycling of previously developed land which will reduce pressure on rural areas, greenfield land and the natural environment. Rural communities should only accommodate growth sufficient to meet local needs.</p> <p>However, the spatial principles also acknowledge that in the intermediate to longer term, greenfield land will have to be released in order to accommodate the scale of growth in the form of planned urban extensions. Each of these preferred options for urban extensions (to the north of Luton/Dunstable and Houghton Regis and east of Luton) are identified, including eastward expansion for the settlement of Leighton Buzzard/Linslade. This approach will maximise the potential to deliver a sustainable pattern of development across the conurbation and opportunities to integrate the planned new mixed use communities with the existing town centres and communities by sharing and enhancing new facilities and infrastructure.</p> <p>Furthermore, these principles lend themselves to providing certainty for developers and stakeholders thus helping to secure a scale of land provision and planning contributions sufficient for developments to remain viable - in delivering new supporting infrastructure and design quality, including key renewable and decentralised energy measures.</p> <p>The spatial strategy clearly signals the need to identify contingency plans including the need for a mechanism to coordinate action where there are any areas of weakness in terms of deliverability. For example, the key development phases of the strategy and associated phasing of infrastructure are articulated, which will support the Annual Monitoring Statements and the setting of more detailed triggers and corrective mechanisms to ensure progress in delivery is maintained.</p> | |

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| Do you support the Spatial Development Strategy and Key Diagram? | |
| Yes | No |
| ✓ | |
| Why? | |
| <p>The Borough Council supports the approach, particularly the emphasis on:</p> <ul style="list-style-type: none"> • regenerating Luton Town Centre; • strategic employment land provision to aid economic diversification of the Borough; • providing necessary community facilities and cultural development to serve all sectors of the community; • accessibility via public transport – bus/rail, Luton town centre facilities and strategic Park and Ride sites, and maximising opportunities to extend the (core approved) | |

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guided Busway to connect the centre of Luton to serve the new urban extensions and key development locations and employment sites;

- highway infrastructure improvements – in particular to address the issues of removing through traffic from roads in Luton and on minor roads to the north of the town, together with reduced congestion at key gateways into the town; and
- using the urban extensions to enhance the sustainability of the existing conurbation and the regeneration of areas – such as Marsh Farm, which are likely to be adjacent to the new growth.

A public transport, walking and cycling led approach, at the heart of the spatial strategy will greatly assist achieving an integrated and sustainable development pattern by promoting modal shift. Such measures should help to minimise over reliance on costly road infrastructure as an enabler of development. Complementary orbital road capacity improvements, necessary to remove through traffic and to access development, will ensure that public transport benefits from reduced traffic. Emphasis on public transport should also provide opportunities for exploring new innovative ways of increasing accessibility via mixed use developments across the urban areas, and linking with transport interchange facilities, thereby minimising the need for (and amount of travel) by the private car.

A public transport led approach will also facilitate demand management and traffic calming measures to promote modal shift in urban extensions – recognising that in future, Government finance and developer contributions will increasingly need to demonstrate how improvements tackle modal shift and transport innovation.

A separate Integrated Development Programme (IDP) sets out sources of funding in a programme that can be related to the critical phasing and implementation of schemes and investments to deliver the spatial development strategy. Furthermore, both the Borough and Central Bedfordshire are progressing Supplementary Planning Documents (SPDs) on developer contributions through Section 106 contributions, which will be complementary in their overall approach. Site-specific contributions are likely to reflect the needs of individual sites, whilst funding through formulae (or other approaches) may help to tackle the needs of the wider conurbation via a possible Community Infrastructure Levy or some other arrangements.

Chapter 5 – Accessibility and Transport

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| Do you support the proposals for strategic public transport infrastructure? | |
| Yes | No |
| ✓ | |
| Why? | |
| <p>Strategic public transport infrastructure is supported, it is necessary to encourage a sustainable development pattern which integrates environmental, social and economic objectives of the Borough Council. For example, the strategic public transport infrastructure will benefit Marsh Farm and other areas and thus contribute in reducing deprivation in Luton overall. More specifically, the extension of the Busway to serve the sustainable urban extensions together with the Park and Ride sites will maximise the opportunity for sustainable travel, and also benefit nearby residential areas.</p> <p>The proposed range of public transport improvements should provide a framework for a step change in public transport provision, which will benefit local residents and businesses (e.g. reduced pollution, emissions, delays and costs) and help address traffic congestion across the conurbation. This will also help the Borough Council to make a transport related contribution towards climate change mitigation objectives. Other potential benefits include reduced local pollution, respiratory diseases, accidents and less pressure on local health and emergency services, hence an improved wellbeing for residents.</p> <p>Given the cost and at times adverse environmental impact of roads, an advantage of public transport is the need for less reliance on major road schemes. In future, Government finance</p> | |

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and developer contributions will increasingly need to demonstrate how improvements tackle modal shift and transport innovation; and corresponding accessibility benefits for all sections of the community. Introducing technology to progress 'through ticketing' and 'seamless transfer' will help to maximise passengers numbers within larger urban catchment areas.

Do you support the proposals for Strategic Highway Transport infrastructure?

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| Yes | No |
| ✓ | |

Why?

Currently, the Borough experiences severe peak levels of congestion because strategic east/west traffic movement routeing brings unnecessary through traffic to the town centre via radial routes (also major north/south M1 movement when there is disruption) – which can be a significant cost and time disincentive to commercial, retail and other businesses.

The package of highway schemes is therefore necessary in order to enable strategic traffic to be removed from the built up area. In doing so, road space should be released along the major radial routes, which can be more efficiently used for increased public transport provision with potentially better quality speeds and frequencies. For example, the Eastern Bypass will bring significant traffic relief and environmental benefits to homes around the dual carriageway section of Hitchin Road and Vauxhall Way, enabling bus priority measures to be introduced along these routes.

Improving strategic orbital accessibility will also ensure better integration and social and economic cohesion across the Borough by connecting new communities with key employment locations, the existing urban area and town centres. Additionally, removing strategic through traffic including HGVs (with appropriate traffic calming measures) and positive signing of lorry routes, will bring environmental and safety benefits. Improved accessibility and orbital connectivity will also boost the attractiveness and business competitiveness of the conurbation and improve conditions for inward investment to deliver the Borough's job creation targets.

In Leighton Linlade the proposed schemes (for example the new spine road proposed to serve an eastern extension) will be of a more local scale, in keeping with the less strategic development role for the town given its size, function and character.

Do you support the proposals for maximising sustainable travel?

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| Yes | No |
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Why?

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The integration of measures for both strategic highway infrastructure and the public transport network will provide a positive context to maximise sustainable travel and reduce the costs and disbenefits associated with congestion.

Luton Borough and Central Bedfordshire can take this integrated package approach forward as partners, through the LTP which encourages this approach based on Department for Transport requirements. Investment can also be supported via the Integrated Development Plan, which identifies funding streams, and other potential contributions needed to deliver the Joint Core Strategy.

An integrated approach to accessibility and travel helps support Council-wide objectives on tackling obesity and promoting healthy lifestyles. There are also opportunities to reduce pollution, respiratory disease, accidents, and mitigate carbon dioxide emissions to help combat climate change.

Improvements to public transport services and walking/cycling networks will also present opportunities to benefit local businesses and key growth drivers. For example, bus routes that serve the Airport and facilitate more flexible working shift times and better link residents to local places of work, will help to minimise the need to travel to work by car. Combined with Travel Plan initiatives to encourage greater use of sustainable travel (such as the Airport travel card scheme) these measures will assist businesses in recruiting locally with competitive transport and housing costs.

Chapter 6 – Providing New Homes

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| Do you support the proposals for the proposed housing targets? | |
| Yes | No |
| ✓ | |
| Why? | |
| <p>LBC supports the overall targets set out in East of England Plan as a means of delivering balanced growth and regeneration of the town in partnership with Central Bedfordshire. There is an enormous need for new housing, one important indicator is the size of Luton's Housing Needs Register, which currently shows 5,434 households on the 'list', plus 1,000 transfers and 700 homeless households; and there are approximately 1,600 listed households in the former South Bedfordshire area. Strategic scale new urban extensions will increase the viability of developments and help secure economies of scale. Increased contributions can then be made towards social and community infrastructure. In particular, this will help to secure the priority objective of delivering 35% to 50% affordable homes for local residents to address the housing crisis in the Borough - as identified above and in the Strategic Housing Market Assessment. Design will also be enhanced to ensure homes are of an appropriate standard, type and quality to meet specific local needs, particularly family accommodation.</p> <p>LBC also supports the principles of delivering as much of this housing as possible within the Borough to secure sustainable regeneration through recycling land and buildings, and will continue to play an important role in land supply. However, Luton is one of the most densely populated urban areas in England, and it needs to be recognised that there is public concern about ever increasing density intensification (e.g. so-called 'backland' development involving existing properties). This is why an appropriate urban/greenfield balance has to be struck.</p> <p>With anticipated green field releases, which are likely to be in close proximity to the existing built up area, there are welcome opportunities to integrate and support the regeneration of the Luton/Dunstable conurbation. This concept is an important component of the MKSM Sub-Regional Strategy.</p> | |

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| Do you support the delivery of a constant supply of housing land? | |
| Yes | No |

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| ✓ | |
| Why? | |
| <p>The Borough Council supports a balanced and clearly phased delivery of housing in tandem with employment, necessary transport and community infrastructure. This phased approach must also respect the need to maintain a 5-year available supply, and a 15-year planning horizon or housing trajectory, in accordance with Government guidance – PPS3 Housing.</p> <p>Phased housing development will ensure that transport, and social and community infrastructure, does not become overloaded before any necessary new or enhanced existing provision can be delivered. Overall – a continuous supply of housing land will enable the urban extensions and the supporting infrastructure to be planned, developed and delivered more effectively.</p> | |

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| Do you support the provision of housing for all needs? | |
| Yes | No |
| ✓ | |
| Why? | |
| <p>The Strategic Housing Market Assessment demonstrates that this is a vital objective for regenerating the town and indeed the conurbation. The Core Strategy emphasis in addressing the range of demand for affordable housing within the Borough (e.g. family and social rented accommodation, including meeting the needs of gypsy and traveller communities), will help to ensure that the right types and quantities of housing for each tenure needed is delivered. The risk if this is not secured, is that local communities will suffer deprivation and overcrowding, support networks will be undermined as families are forced to seek cheaper and inappropriate accommodation elsewhere outside the Borough/conurbation thereby impacting adversely on adjacent areas. There would also be implications regarding commuting, support services and the ability for businesses within Luton to recruit local skills. There is also the need for a mixed tenure approach from a community sustainability perspective.</p> | |

Chapter 7 – Our Economy and Employment Needs

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| Do you support proposals for providing a supportive employment framework? | |
| Yes | No |
| ✓ | |
| Why? | |
| <p>The Borough Council specifically sought to increase the employment targets within the RSS, and the MK-SM SRS, so that the Core Strategy could ensure the balanced regeneration of the town. These strategic targets are aimed at balancing homes and jobs over the whole Plan period in order to minimise unsustainable forms of commuting and ensure that wealth is retained within the local communities, in order to support local services and infrastructure.</p> <p>A key component is to support the designation of strategic employment areas. One is proposed near to the Airport to take advantage of this regionally significant growth driver with significant local employment benefits. Another is proposed near to the M1 proposed J11a in order to address the high levels of commuting which currently takes place.</p> <p>Similarly, the Core Strategy will be complemented by the Integrated Development Plan which has identified the need for remedial action on ageing industrial estates, referred to as “amber sites”. These sites have been identified through the supporting Employment Land Review (2008) which has also helped to identify significant opportunities for recycling land and regeneration of sites for other uses, including mixed uses for employment and housing.</p> | |

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Chapter 8 – Building Communities

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| Do you support the proposals for social and community infrastructure in Luton and Southern Bedfordshire? | |
| Yes | No |
| ✓ | |
| Why? | |
| <p>The proposals complement approaches being taken forward by the Council such as reshaping the estate with its emphasis on dual use of facilities. It is important that local facilities are accessible and within walking distance of people's homes. The proposals also complement partnership approaches to delivery.</p> <p>The Council has supported neighbourhood working and has provided practical help for emerging community development trusts as well as supporting the voluntary and community sector in a variety of ways. The Council's current Review of its Relationship with the Third Sector will provide further opportunities for joined up action and support for social and community infrastructure.</p> <p>The Council acknowledges the challenges this Plan brings in terms of expanding existing facilities, such as schools, within the existing urban area; but supports the strategy as delivering the best overall approach to achieving sustainable communities.</p> | |

Chapter 9 – Improving Town Centres

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| Do you support the proposals to improve the town centres in Luton and Southern Bedfordshire? | |
| Yes | No |
| ✓ | |
| Why? | |
| <p>The proposals provide a very supportive policy context for the continuing regeneration of the town centres. Reference is made to regional planning guidance, a brief mention of policies such as SS6 and E5 might be useful (e.g. in E5 Luton is a 'major town centre'-which has a meaning in terms of its role in the regional structure, the Options document uses other terms). Reference could be made to the fairly recent Luton town centre study by consultants, and possibly link this with the 2009 Retail Study, and ongoing projects.</p> <p>Consideration should be given to elaborating the role of the major town centre sites in delivering the overall spatial strategy. As for national policy, PPS6, it appears that the Competition Commission are going to further research the problematic 'competition test', with results by October, this may have implications. The recession has led to the Secretary of State suggesting a raft of measures to encourage business activity (e.g. Local Development Orders, temporary shop leases, deferring business rate, relaxation of parking and delivery standards, departure from frontage policy). A view may need to be expressed about these concepts in ongoing policy formulation.</p> | |

Chapter 10 – Adapting to and Mitigating Climate Change

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| Do you support the proposals for resource efficiency measures in Luton and Southern Bedfordshire? | |
| Yes | No |
| ✓ | |
| Why? | |

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The MKSM Implementation Plan and the intention to work towards sustainable construction techniques, including energy use and maintenance of buildings, should be included. Recently, research has been commissioned to provide an evidence base for supporting renewable and decentralised energy within the urban extensions. This will help to ensure that area-wide and site-specific targets and contributions can be made.

Do you support the proposals for flood mitigation measures in Luton and Southern Bedfordshire

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| Yes | No |
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Why?

Addressing flood mitigation and supporting water management plans for strategic growth will also benefit existing built-up areas. Opportunities will arise for river corridor improvements for the recreational benefit of local people and for wildlife habitat improvements.

Chapter 11 – Green Infrastructure and Green Space

Do you support proposals for green infrastructure and green space within Luton and Southern Bedfordshire?

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| Yes | No |
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Why?

The proposals reflect the priorities for green infrastructure and green space provision that the Council supports, particularly with regard to the Chalk Arc and River Lea Corridors. The existing Rights Of Way network in and around Luton needs to be incorporated into the Master Planning of the sustainable urban extensions, which will encourage walking and cycling both within the urban area, and recreational journeys into the surrounding countryside.

Chapter 12 – Countryside and Heritage

Do you support proposals to protect, conserve and enhance countryside and heritage?

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| Yes | No |
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Why?

The Council recognises the importance of countryside and heritage to the quality of life for existing and future residents, and to provide attractive environments for business.

Do you support the policy concerning heritage and townscape in Luton and South Bedfordshire?

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| Yes | No |
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Why?

The draft strategy supports the protection of important heritage and townscape features, which is a necessary function of the development plan process.

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Do you support the policies to protect and enhance biodiversity and geology in Luton and South Bedfordshire?

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| Yes | No |
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Why?

The Council supports the policies as they recognise the importance of bio- and geo-diversity and the duty placed on public bodies by the Natural Environment and Rural Communities Act 2006. (N.B. There are now 25 County Wildlife Sites in Luton, not the 19 referred to in paragraph 12.24 of the Preferred Options).