Issues and Options Consultation Report for Core Strategy and Key Diagram DPD

Introduction

This analysis report provides a summary of responses to the Issues and Options consultation, which took place between the beginning of July and the end of October 2007. The Issues and Options paper is the first consultation document prepared as part of the process of adopting a Core Strategy and Key Diagram Development Plan Document for the Luton and South Bedfordshire growth area. When adopted, the Core Strategy will set out the spatial vision for the area and the broad development principles and proposals that will help achieve that vision over the coming years. It will form part of the Local Development Framework (LDF), which is the new generation of development plan at a local level, comprising a folder of documents in place to guide future development.

The Issues and Options paper identifies issues which are important for Luton and South Bedfordshire and poses a series of questions related to each. It also puts forward ten possible options for growth in answer to the question 'where will development go?' These options incorporate the following five criteria; development focused within the bypasses; development focused within and beyond bypasses; development focused on maximising proximity to town centres and main employment areas; development focused on achieving wide distributional spread; and development focused within Luton. Each of these criteria is set in combination with assumptions as to the estimated minimum and maximum amounts of land take necessary to facilitate the provision of the requisite amount of growth.

The Issues and Options paper was produced in accordance with Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004, but the preparation of the document itself was not a statutory requirement, meaning that the consultation undertaken at this stage in the production process exceeds the legal requirement. It was produced to help stimulate discussion amongst the local community and stakeholders and highlight the challenges that exist in the delivery of growth. Its production also supports the new approach of 'front-loading' the planning process and thus allowing the public more involvement at the earliest possible stage, in accordance with the Joint Statement of Community Involvement.

The findings of this consultation represent one evidence stream, which must be considered along with the findings of other studies including those relating to housing needs, urban capacity, employment land, flood risk and transport, to inform the production of a Core Strategy Preferred Option paper. Statutory public consultation on this paper is scheduled to take place in summer 2008 for a period of 6 weeks.

Background

The Luton and South Bedfordshire growth area relates principally to the areas of Luton, Dunstable, Houghton Regis and Leighton-Linslade. It is part of the Milton Keynes and South Midlands growth area promoted by the Government through the Sustainable Communities Plan (2003). The area is required to deliver 26,300 homes up to 2021, with sufficient land safeguarded for an additional 15,400 homes up to 2031. Alongside all these homes, adequate employment opportunities and infrastructure also need to be provided.

Because Luton, Dunstable and Houghton Regis effectively form a single conurbation, and as the growth needs to be delivered across Luton and South Bedfordshire, Luton Borough Council and South Bedfordshire District Council, along with Bedfordshire County Council, resolved to work together to prepare a joint LDF for the growth area. To this aim, officers and Members from the three councils are working together in the context of the Luton and South Bedfordshire Joint Committee, which is now statutorily responsible for all planning policy decisions for the growth

area. Liaison has also taken place with officers of the neighbouring authorities of Aylesbury Vale and North Hertfordshire District Councils to ensure adequate and appropriate consultation in the parts of their areas that might be affected by development.

Consultation detail

People were invited to respond to the consultation by a variety of methods including a detailed questionnaire as part of the Issues and Options paper, a shorter questionnaire as part of a householder summary leaflet and an exhibition questionnaire, which accompanied staffed exhibitions. Other comments were received by letter, email and fax, along with the findings from various workshops held with stakeholders and hard-to-reach groups.

As consultation on the LDF is an ongoing process with various partners involved, a logo and slogan were designed, the purpose of which is to make all LDF related consultation instantly recognisable to the general public. Thus the slogan 'Shape Your Future' and the jigsaw logo is used as the official heading for this and all future stages consultation.

The consultation was planned in 4 stages as follows:

Stage 0	(April- May)- meeting, planning and timetabling	
Stage 1	(June)- Public awareness raising	
Stage 2	(July - September) - Public exhibitions/ general consultation	
Stage 3	(October) Hard to reach groups/ stakeholder workshops and meetings/general consultation	
Stage 4	(November- February) Analysis and interpretation of data and feedback	

In the weeks leading up to the consultation start date (2nd July 2007) an awareness raising campaign was undertaken which included a media briefing for all local press, a 4-page front cover feature in the 'On Sunday' group of newspapers for two consecutive weeks along with various press releases and radio advert played at peak times which continued throughout the consultation period. An 8-page leaflet (detailed below) was also delivered to every household in the area (a total of approximately 130,000) in the weeks leading up to the consultation period with the aim of raising general awareness. This leaflet was also delivered to those villages in the neighbouring areas of Aylesbury Vale and North Hertfordshire districts that may be affected by the development.

The Issues and Options paper consultation was undertaken in conjunction with consultation for the emerging South Bedfordshire Sustainable Community Strategy being prepared by the South Bedfordshire Local Strategic Partnership. When produced, the strategy will contain local priorities and objectives that the Local Development Framework must help to achieve through effective land allocation.

To combine the two strands of consultation, the 8-page householder leaflet was produced to summarise the issues and options and identify local priorities. It contained a short questionnaire, designed to ask local people to rank the issues and priorities identified in order of importance. To encourage people to return their questionnaire, two cash prizes of £1000 (one for a resident of Luton and one for a resident of South Bedfordshire) were offered.

Throughout the consultation period, a staffed exhibition toured South Bedfordshire, Luton and neighbouring areas that could potentially be affected by the development. It also visited settlements in adjoining authority areas that might also be affected. A full itinerary of the exhibitions is set out in Appendix 1. People visiting the exhibition were asked to fill out another short questionnaire, directly relating to the content of the exhibition. A detailed questionnaire was also included in the back of the Issues and Options paper, which allowed people to consider all the information and comment in more detail. The questions from each of the three questionnaire formats are included at Appendix 2.

Specific attempts were made to contact potentially hard to reach groups through conducting workshops in a number of schools, and making presentations with associated workshops to several groups (including Gypsy and Travellers, and the Luton Against Poverty Forum).

Towards the end of the consultation period, a number of workshops were held with the key stakeholders. These events were organised by the South Bedfordshire Local Strategic Partnership in association with the Joint Committee, and by the Luton Assembly. Some of these events focused on a single issue.

Finally, a dedicated website www.shapeyourfuture.org.uk was set up to facilitate a single web presence for the work of the Joint Committee and make electronic information more accessible; rather than placing it on the websites of the three authorities involved. The site contains general information and updates, along with documents, questionnaires and a general comments email facility. It will be retained for all future stages of the LDF consultation.

Structure of this report

The remainder of this report sets out the response to each of the five issues identified in the consultation material, which were:

Issue 1	Where will the development go?
Issue 2	Where will people work? And in what sorts of jobs?
Issue 3	How will people travel?
Issue 4	What role will our town centres have?
Issue 5	How can our communities and neighbourhoods be more inclusive, sustainable and
	healthy?

The following sections seek to identify the overall nature of the responses received drawing particular attention to the comments or views of these bodies with a detailed knowledge and/or influence over what might happen. It therefore focuses on a combination of the findings of the statistical analysis of the tick box questions, in combination with many of the general comments made by respondents. It does so by use of the 14 questions in the Issues and Options document. It does not seek to provide a fully comprehensive quantitative and qualitative analysis of all the responses to each of the various questionnaires.

If concludes by a brief analysis of the equalities questionnaire. This is with a view to determining a picture of the nature of people who are both responding to the consultation and choosing to complete this part of the questionnaire. The findings will be used in the future to determine whether and, if so, how the Joint Committee can reasonably seek to engage with a wider range of people in order to gain a more representative response from the community.

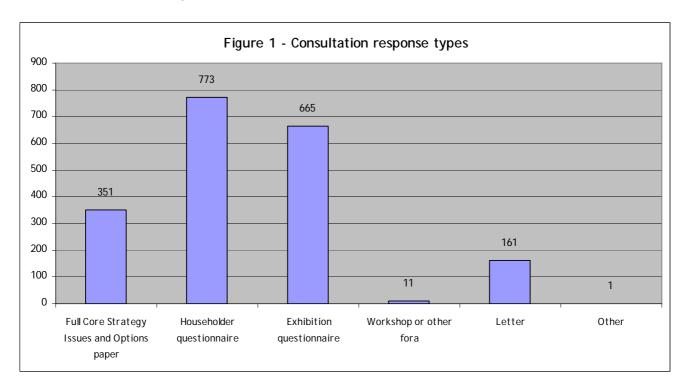
Appendix 1 sets out a list of all the exhibitions and other events that were held throughout the consultation period. Appendix 2 contains the questions from each of the three questionnaires used as part of the consultation, and Appendix 3 includes relevant graphs and tables to illustrate some of the statistical analysis contained within this report.

Number and type of responses

A chart showing the breakdown of response types is shown in Figure 1 below.

- 351 people filled out the Issues and Options paper questionnaire, either online as a paper copy. This was the most detailed questionnaire issued.
- 773 people filled out the householder questionnaire; this was the shortest questionnaire that was included in the 'Shape Your Future' leaflet delivered to every household in South Beds and Luton, plus some neighbouring areas. This questionnaire was intended to set the priorities for the South Bedfordshire sustainable community strategy

- 665 people filled out the exhibition questionnaire; this questionnaire was given out at the exhibitions that toured South Beds, Luton and some neighbouring areas.
- In addition, there were 11 workshop or forum responses and 161 letters.
- In total, 1,962 responses were received.



Issue 1 - Where will the development go?

Do you think we have identified what is important in relation to 'Our Growth'?

The Shape Your Future leaflet circulated to all households in Luton and South Bedfordshire asked readers if they thought we had identified what is important in relation to our growth. For the 'Our Growth' section of the leaflet, 56% of the 754 respondents who answered this question either agreed or strongly agreed that we had identified what is important in relation to our growth, with 24% either disagreeing, or strongly disagreeing. See Figure A.1 in Appendix 3.

Analysis of 'considerations' questions

The three questionnaires were aimed at different audiences, but had some similar questions, particularly those discussed in a) and b) and c) below. For each of these questions, respondents were asked to choose and rank up to 3 issues in order of importance. The results pick out the most popular responses, combining where people have ranked the considerations in their top 3.

a) What are the most important things we should consider when we plan the growth? (Exhibition questionnaire Qu3 and Householder questionnaire Qu6)

The top three most important considerations (see Figure A.2 in Appendix 3) were:

- Using as little of the green belt as possible (599 responses)
- Traffic congestion (593)
- Protecting the natural environment and landscape character (568)

b) Which of the following was most important in reaching this decision? (ie. when choosing which spatial option for growth)

(Exhibition questionnaire Qu2)

The top four most important considerations (see Figure A.3 in Appendix 3) were:

- Protecting the natural environment and areas of sensitive landscape character (294 responses)
- Using as little of the green belt as possible (294)
- Minimising development in and around villages (258)
- Concern about the potential traffic congestion (241)

c) When choosing your preferred options for development, which of the following considerations were more important to you?

(Issues and Options questionnaire Qu3)

The top three most important considerations (see Figure A.4 in Appendix 3) were:

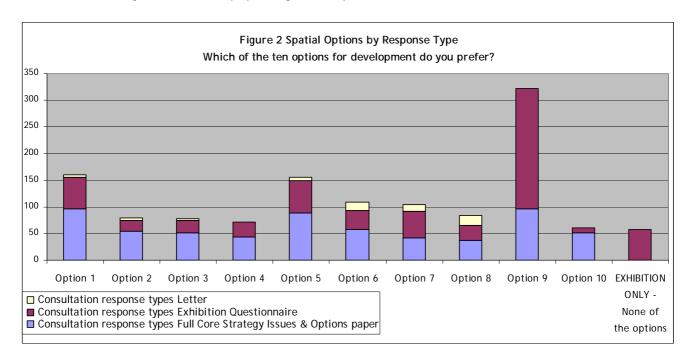
- Trying to protect the natural environment and landscape character (192 responses)
- Concern about the potential traffic congestion (127)
- Concentrating development in bigger urban extensions, to minimise the effect to the wider area (103)

In summary, the main priorities for respondents concern the green belt, protecting the natural environment and traffic congestion.

Spatial Options

The Issues and Options paper set out ten possible options for where the growth should be located. Question 1 of the paper asked respondents to choose up to 3 of the options which they most favoured. Further, the exhibition questionnaire invited people to choose the option that they favoured. Consultees who responded to the consultation by letter also often indicated a preference for a specific option, so those responses have also been included in this analysis. The description of Options 1-10 is included in Appendix 2 as the content of Issues and Options Paper Question 1.

Figure 2 below breaks down which options were favoured by respondents using those three separate response types. It is clear that Option 9 ('Development focused on Luton, with minimum land-take') was by far the most popular growth option.



The detail of Figure 2 however shows that around 70% of responses identifying Option 9 were from exhibition questionnaires. Looking only at responses to the full Issues and Options paper, Options 1 ('Development focused within bypasses, with minimum land-take'), Option 5 ('Development focused on maximising proximity to town centres and main employment areas, with minimum land-take'), and Option 9 ('Development focused on Luton, with minimum land-take'), were all popular options, with 96, 89 and 96 Issues and Option paper responses each.

This apparent preference for minimum land take options correlates with the pattern discussed earlier, where protecting the natural environment and using as little green belt land as possible were shown to be key priorities and considerations for respondents.

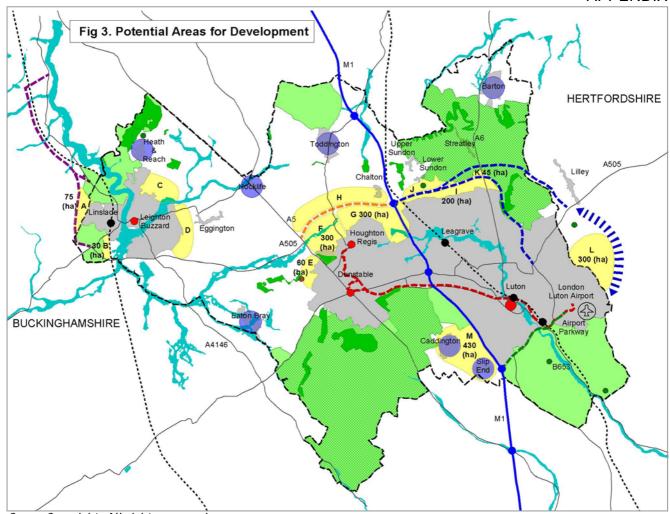
Green Buffers

With reference to Question 4 in the Issues and Options paper, relating to how existing village settlements near the edge of the urban area should be treated, respondents showed a clear preference for the creation of green buffers between new development areas and existing villages. Of the 254 respondents to this question, 227 (89%) recommended the creation of green buffers, with 27 (11%) responding that the urban extensions should incorporate the villages close to the urban edge, and integrate them into new communities.

Whilst a significant number were in favour of Green Buffers as a general principle, some specifically identified that when revised the boundary of the Green Belt should be aligned so as to prevent the coalescence of the villages. Others considered that a more flexible approach should be adopted taking account of the specific location and scale of the villages or settlements, the local topography of the area and the potential for green infrastructure to help maintain the character of villages.

Full comments analysis

Specific comments made on the appropriateness or otherwise of developing in particular areas are set out below. The potential development sites (Areas A-M) are identified in Figure 3.



Crown Copyright. All rights reserved. Luton Borough Council / South Bedfordshire District Council. Licence Number 100023935/100023295 (2008)

Growth at Leighton Linslade

The area of Leighton Linslade was subject to a number of dedicated comments both in favour of and in objection to development around the two settlements and centred around differing opinions on whether growth would assist in resolving the town's social and transport infrastructure deficit or accentuate it. The majority of the support for development was from developers, particularly those with interests for the area to the east of Leighton Buzzard who promoted the benefits of growth. Other groups, including South Bedfordshire District Council, Leighton Linslade Town Council and Friends of the Earth, also supported the potential that growth could have, whilst others stated that no growth around Leighton Linslade would not accord with the MKSMSRS.

The bulk of the objections for development related to concerns over the capacity of the town's social and transport infrastructure to cope with the additional housing. Many respondents cited the recent large housing developments in the south of the town which they felt had not provided the improvements in infrastructure needed and that more similar development would cause significant problems. In relation to this, some respondents identified that the town had already taken a significant share of the housing development in recent years and further growth would impact upon the town's market character.

There were also concerns about flooding, particularly to the east of Leighton Buzzard in Potential Development Areas C and D and concerns that the development of the Flood Alleviation Scheme in this area was to be delayed. The summer flooding problems in the rest of the UK were mentioned as a useful reminder of the problems of developing in and around flood plains with or without proper defences in place.

Potential Development Areas A and B were identified by a number of respondents to be areas of high landscape value that they considered should be preserved. Area B was also identified by some respondents to be poorly related to the urban area by virtue of the West Coast Mainline separating this area from the edge of Linslade.

2. Land to the West and North of Dunstable and Houghton Regis

The principal objections to development in this area was the impact on the transport network, which many identified to be heavily congested, and the loss of countryside though some recognised that, compared to other potential development areas, the landscape in Areas F & G was of less environmental quality and sensitivity. The prospect of the A5-M1 link and strategic access to the M1 at Junction 11, the area's proximity to Dunstable and Houghton Regis Town Centres and employment areas were the main reasons identified in favour of development in this area. The Maiden Bower ancient monument in Area E was identified as an important feature that should be protected along with the SSSI and County Wildlife Site.

The impact of increased congestion on this area prior to the completion of the M1 widening and the A5-M1 link was mentioned by a number of respondents. Whilst many considered that development in this area prior to the road infrastructure being completed was not suitable, others, principally the developers, disagreed stating that the introduction of other measures and initiatives as part of development would not exacerbate the congestion problems in this area. South Bedfordshire District Council supports development north of Houghton Regis (and Luton) provided that there is localised access to major road links (e.g. A5 - M1 link).

Potential Area H was subject to only a few direct comments with many not favouring its development owing to the severance that the A5-M1 link might create, the lack of a firm boundary to development and the impact on the landscape.

3. Land to the North of Luton

Comments in relation to this area were focused on the lack of funding for the Luton Northern Bypass and the delay this may have over delivery of development in this area, as well as the potential impact of development on the sensitive areas of landscape, notably the AONB and SSSIs. Equally, the potential coalescence of Lower Sundon with the conurbation was identified by some respondents as a key consideration to development in this area. The proximity of this area to the new strategic road network was identified to offer a potentially suitable location for new employment land and premises by some respondents.

As with Area H, Areas J and K shown beyond the inner alignment of the potential Luton Northern Bypass received some direct comments concerned about the potential problems of severance the road would create.

4. Land to the East of Luton

There were a number of specific representations objecting to development in this area with many raising concerns over the impact of the development on the landscape in the area which was identified by many to be of high quality and importance. There were also a number of objections on the basis that development would lead to the coalescence of Luton and the villages of Cockernhoe and Mangrove, and encroachment into Hertfordshire as a whole. There were also concerns about the timely delivery of this area, owing to its location outside of the area covered by the Joint Committee and therefore under the jurisdiction of North Hertfordshire District Council. Indeed, a number of respondents were keen to understand why Luton and South Bedfordshire were proposing development outside of their administrative areas.

5. Extent and Scale of Village Growth

Whilst there was some support for village growth to help improve their sustainability through the provision of additional public transport services, shops, schools and other such facilities, there was greater objection to village growth with many citing the loss of character, impact on their setting and pressure on services as reasons for restricting development. Concerns about traffic were also identified in villages like Toddington, Hockliffe and Caddington which have principal roads running

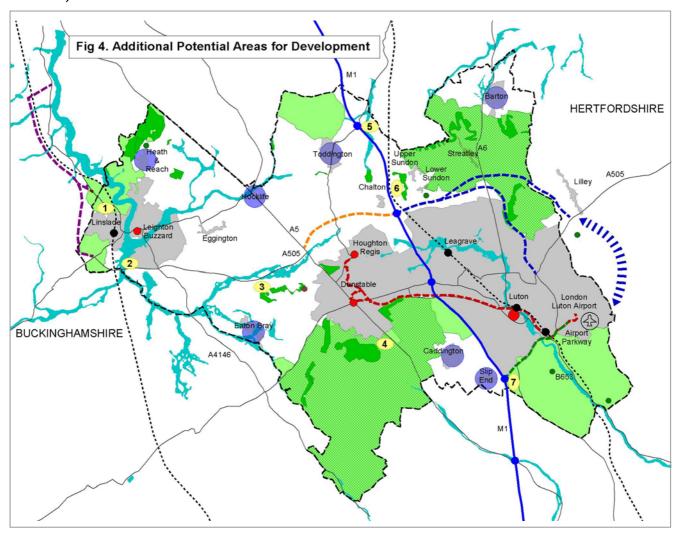
through them. There was particular objection to the development of the village of Barton le Clay, notably from the Parish Council and local residents.

Despite being included in the most popular option (Option 9), the potential development of Area M around the villages of Caddington and Slip End received specific objections with many of the respondents concerned about lack of connectivity to Luton, the loss of character and landscape and increased traffic and flooding. Some, including Caddington Parish Council, considered that some small scale growth would be appropriate to assist in supporting the local schools and shops.

6. Additional Potential Areas for Development

In addition to comments received on the Potential Areas for Development shown in the Core Strategy Issues and Options paper, some additional areas were promoted by landowners and developers. These areas are shown on Figure 4 and include:

- 1) Land to the North of Linslade.
- 2) Land to the West of Grovebury Road in Leighton Buzzard
- 3) Land at Totternhoe Lime and Stone Works
- 4) Land to the South of Dunstable along the A5.
- 5) Land to the South East of Junction 12 of the M1.
- 6) Land at Sundon Quarry to the east of the M1.
- 7) Land to the South East of Junction 10a of the M1.



Crown Copyright. All rights reserved. Luton Borough Council / South Bedfordshire District Council. Licence Number 100023935/100023295 (2008)

With regard to what considerations were the most important in choosing options, as asked in Question 3 of the Issues and Options paper, the following points were raised.

A. Greenfield Land vs Urban Land

The options which include maximum urban development were favoured above those which include minimum urban development. This suggests that the development of urban land is strongly favoured over greenfield land and this is reflected in the majority of the additional comments with many respondents stating that opportunities in the urban area should be developed first. However, some respondents did identify that the early delivery of urban extensions on greenfield land offers the opportunity to develop strategic employment sites, improve the image of the area, improve infrastructure and green space provision and make a contribution to meeting some the housing needs of the area, notably larger family homes.

South Bedfordshire District Council supports maximum land-take, but without the presumption of low average density, so as to retain flexibility. Hence, the Council favours options 2, 8 and 10 and rejects options 1, 3, 4, 7 and 9. Its preference is a hybrid option which results from flexibility is a combination with an average density of dwellings of 35-40 per hectare. This hybrid option is effectively maximum land take focused within the bypasses with additional sites C and E and development at Heath and Reach, Hockliffe, Toddington, Barton, Caddington and Slip End.

B. High Density vs Low Density

The fact that the majority of high density development options (Options 1, 3, 5, 7 and 9) were favoured above low density options (Options 2, 4, 6, 8 and 10), suggests that high density development is favoured. Reviewing some of the detailed comments, it is apparent that whilst the majority favour high density as a means of protecting the countryside and encouraging public transport, respondents that favoured low density development were concerned that high density development could lead to town cramming, increased congestion, loss of open space, a lack of parking and a poorer living environment for residents. A number considered that development at a range of densities would be more suitable and identified that an average of around 40 dwelling per hectare should be considered.

C. Effect on Local Area

As the responses to Question 3 of the Issues and Options Paper show, 18% of the respondents stated that they made their choice on the basis of trying to minimise the effect of the growth on where they lived. This was particularly the case around villages with 39% of respondents to the exhibition questionnaires identifying a preference to minimise development in and around the villages. This reflects the detailed comments discussed above, with some local opposition being voiced within villages, notably Barton, Toddington and Caddington, and some evidence of local opposition to potential growth in Leighton Linslade and to the East of Luton.

D. Concentration vs Dispersal

A number of comments received related to the issue of the extent to which development should be concentrated or dispersed. Those that supported concentration identified that this would provide a greater critical mass of development in one location and thereby enable more successful delivery of services, notably public transport, and also help to reduce the impact of growth in other areas. In contrast, some respondents identified that dispersal would help to spread the impact of growth, both negative and positive, across a greater area. In particular, respondents identified an increase in congestion as a result of growth as a reason for distributing growth more widely. South Bedfordshire District Council sought an even spread of development across the district and Luton, as well as east of Luton.

E. Sustainability

A significant number of respondents identified the importance of locating new housing development near to places of work, near to schools, shops and other services in order to reduce the need to travel or commute. For this reason, many agreed with the principles of developing extensions to the urban area, particularly in areas close to existing employment opportunities.

There was also a vast number of specific comments stating the importance of ensuring that any new housing developments are supported by new facilities and infrastructure including shops, schools and open space, as well as places of work, public transport and major road development

and the majority of respondents stressed the need to provide this infrastructure upfront to avoid impacting adversely on existing infrastructure.

South Bedfordshire District Council considers that development should not encroach on floodplain areas as far as is possible.

F. Deliverability

Many respondents, particularly developers, identified the importance of deliverability and the need to maintain a constant supply of housing in accordance with Government guidance. In particular, they identified the need to assess in detail the extent to which a Potential Development Area or a particular option would be undeliverable as a result of the delay in major road infrastructure or because it lay outside of the jurisdiction of the Joint Committee. It was suggested by some that a detailed assessment of deliverability be undertaken with those areas that are less dependent on major infrastructure identified. The role of small scale developments to maintain a constant supply was also identified by a number of respondents.

Other issues raised related to cross-boundary issues and the areas of search identified in the Milton Keynes and South Midlands Sub-Regional Strategy. These are summarised below.

G. Administrative Boundaries

The issue of proposed development beyond the administrative areas of the Joint Committee was raised by a number of respondents who questioned why Potential Development Area A and L were being identified for development as they lie in North Hertfordshire and Aylesbury Vale.

H. MKSMSRS Areas of Search

The issue of conformity was raised by a number of respondents who identified that some of the Potential Development Areas were outside the 'Areas of Search' in the MKSMSRS and would therefore not be in conformity with it, as required by the Tests of Soundness. This was particularly discussed in relation to Potential Development Area M and the villages. Others, quoting from the Panel Report on the MKSMSRS, identified that the panel's recommendation was to "focus" development in the Areas of Search but that this did not preclude any development in these areas. It was also identified by some respondents that the Panel had recommended the LDF to identify the areas for development using greater evidence and following appropriate public consultation.

Issue 2 - Where will people work? And in what sorts of jobs?

Do you think we have identified what is important in relation to 'Our Economy'?

For the 'Our Economy' section of the Shape Your Future, householder leaflet, 55% of the 722 respondents who answered this question either agreed or strongly agreed that we had identified what is important in relation to our economy, with 22% either disagreeing, or strongly disagreeing. See Figure A.1 in Appendix 3.

Location of employment uses

With reference to Question 5 in the Issues and Options paper, relating to how employment uses should be located, respondents were fairly evenly split between the two options offered. Of the 259 respondents to this question, 144 (56%) said that we should safeguard most existing employment areas, intensify development in those locations and redevelop poor quality employment sites, and look at employment provision on other sites as a last resort. 115 respondents (44%) said that we should encourage employment development within the proposed urban extensions, with the potential to redevelop existing, poor quality or underused employment sites for other uses. See Figure A.6 in Appendix 3.

Full comments analysis

The broad net additional land requirement identified in the Core Strategy Issues and Options document is generally supported. As unemployment is relatively high in Luton and sites have been lost, some respondents suggest opportunities should be explored for new higher density employment within town centres together with maximising the recycling of existing and underused employment premises and sites. Others suggest there is a need for an economic strategy and to include rural and village regeneration. Some argue that road and public transport nodes should guide the locations chosen for employment growth as they represent the most sustainable locations. Existing employment land in such locations should be safeguarded, such as in and around town centres. Additionally, the provision of small-scale employment units is suggested for edge of town centre sites to complement this approach. There is some support for maximising the use of key economic drivers, such as London Luton Airport, however others argue that reliance on optimistic forecasts relating to such drivers is both unwise and unsustainable because such an approach would place too high a reliance on a diminishing oil-based economy. Luton Borough Council advocated a balance between new homes and new jobs north to south across the conurbation.

The East of England Regional Assembly (EERA) considers that most existing employment areas should be safeguarded and employment development in those locations intensified with poor quality employment sites redeveloped. Employment provision on other sites should only be considered as a last resort. The East of England Development Agency (EEDA) consider that provision should be made for businesses (particularly those based in science, technology, research and innovation) in high quality premises in sustainable locations.

The view was expressed that Leighton Buzzard lacks employment sites and premises and hence there is a need for an employment development east of Leighton Buzzard. A similar employment development north of Houghton Regis would serve the same function in the Dunstable/Houghton Regis area. Leighton-Linslade Town Council seeks new employment opportunities to be integral to proposed urban extensions.

Houghton Regis Town Council supports employment development in proposed urban extensions and the retention and safeguarding of existing employment sites that will continue to perform a useful function during the plan period. They also consider that existing poor quality and underused sites that do not serve such a function should be redeveloped for other appropriate uses. Barton, Streatley, Totternhoe and Lilley Parish Councils and the AONB Management Board effectively share this view but with an emphasis on retaining and intensifying the existing employment areas, where

appropriate. Barton Parish Council also consider that dispersing employment provision to a variety of new sites around the growth area may provide the potential for residents of the area to work locally but that this approach may be likely to attract employees from elsewhere and lead to further in-commuting. Toddington Parish Council do not support the concept of a business park in the village.

Concern was expressed about an existing jobs deficit and economic weakness. Investment and infrastructure required must be identified and provided with jobs and homes balanced to minimise out-commuting. Other respondents are unconvinced about what they perceive as a housing-led approach to employment regeneration, pointing to a poor track record regarding attracting inward investment combined with the risk that houses will simply attract more commuters. Furthermore, these respondents consider that high house prices combined with poor wages, low skills and a degraded and largely historic industrial structure will continue to lead to increased levels of outcommuting. In particular, they consider skills and wages should be increased. They feel there is a need for youth training, education and apprenticeships and that this approach will enable local employees to be able to afford the new homes being provided locally.

Alternatively, because of low skills, 'traditional' mainly manufacturing industry should be encouraged to increase employment levels. Greater use of initiatives such as, Research & Development, technology centres, innovation centres and value added sectors with associated well-paid jobs should be pursued. Such an approach would increase the wealth and quality of life in the area: a key aim of the growth allocated to this part of the sub region. Other initiatives to support and facilitate business growth are also suggested, for example, Simplified Planning Zones (SPZs). Some have complained that Councils have hindered access to vacant business units by over zealously restricting the types of employment reuse they will accept in such units.

Issue 3 - How will people travel?

Do you think we have identified what is important in relation to 'Congestion'?

For the 'Congestion' section of the Shape Your Future, householder leaflet, 47% of the 690 respondents who answered this question either agreed or strongly agreed that we had identified what is important in relation to congestion and transport issues, with 33% either disagreeing, or strongly disagreeing. Of the five issues discussed in the Shape Your Future leaflet, congestion was the issue that most respondents felt had not been adequately addressed. See Figure A.1 in Appendix 3.

Luton northern bypass

With reference to Question 6 in the Issues and Options paper, relating to options for the Luton northern bypass, respondents were fairly evenly split between the three options discussed, showing no significant preference. Of the 222 respondents to this question, 83(37%) said that a route passing close to the edge of the Bushmead area was preferable, compared to 79 (36%) who preferred a route passing across the narrowest point of the Chilterns Area of Outstanding Natural Beauty (AONB). A further 60 respondents (27% of those responding to this question) said that no northern bypass should be built, but instead other measures to encourage the use of public transport should be explored. See Figure A.7 in Appendix 3.

A number of views were expressed about the shortcomings of the section of the inner route between the A6 and A505, including that the route would:

- have an adverse impact on the existing community by virtue of noise, fumes etc in the short term (construction) and long term (use)
- o blight property alongside the route for a significant period of time
- o pass alongside sensitive uses such as schools
- o sever the Galley and Warden Hills SSSI from the rest of Luton
- sever Drays Ditches (a Scheduled Ancient Monument)
- o pass through or near County Wildlife Sites
- present engineering challenges due to topography
- have a reduced impact upon Luton traffic congestion as the route joins the A505 too close to Luton and potentially result in continued rat running through villages in the A6-A505 sector
- o be more expensive (due to the need for tunnelling) than the outer bypass route
- o not link with the potential eastern bypass (south of the A505) should that come forward.

Luton Borough Council's view is that the bypasses should be well removed from the conurbation so as to accommodate all necessary development and serve as defensible boundaries to the green belt. South Bedfordshire District Council also sought defensible boundaries to limit the extent of development in the longer term. North Hertfordshire District Council (NHDC), Houghton Regis Town Council and some of the adjacent parishes to the north of Luton indicated a preference for the more northern route. However, NHDC suggested that the idea of developing beyond the bypass route should not be discounted, and that more evidence was needed regarding the impact of the outer route on the AONB and traffic flows on the A505 to Hitchin. Many of the views expressed about the outer option were counter to the aforementioned disbenefits of the inner route.

Some consultees that expressed an opinion on the inner or outer routes, including the Crown Estates, made the point that the part of Luton's traffic congestion is caused by through traffic and therefore a 'no bypass' option is not a solution to Luton's traffic problems, and that no matter how much traffic calming is introduced there will always be a need for traffic (including public transport) to move freely. Indeed a number of respondents indicated that the options of a new road and other measures were not mutually exclusive, and that both were needed as part of an integrated land use and transport strategy for the Growth Area.

Counter to this view, a number of statutory consultees and local branches of national environmental organisations (including local branches of Campaign to Protect Rural England and Friends of the Earth) raised concerns about the unacceptable invasion and destruction of the

Chilterns AONB resulting from both Bypass options. A number of these respondents (including Natural England, the Chilterns Conservation Board, the National Trust, the and the Wildlife Trust) specifically mentioned that any route that impacted on the AONB was counter to national policy (Planning Policy Statement 7), which affords AONBs the highest status of protection in relation to landscape and scenic beauty and allows major development only in exceptional circumstances (including routes of National Importance).

However in some cases these respondents tempered these comments. For example Natural England stated that they would "certainly object to the northern option east of A6 and probably also the alignment along the AONB boundary". The CPRE responded that the inner option might be acceptable if it was in a tunnel throughout the section below Warden and Galley Hills.

The Environment Agency indicated that, in addition to traffic calming and public transport improvements (including Park & Ride), a "no bypass" scenario needed to evaluate the impacts of:

- o Encouraging walking and cycling to reduce carbon emissions, improve air quality and public health and tackle climate change.
- Hard and soft measures to reduce car parking, including parking restrictions, Low-Emission Zones, Car Sharing Clubs and the issuing of bus and rail passes.
- o Personal, employee, and school travel plans.

Woodside connection

For Question 7 of the Issues and Options paper, relating to alternative route options for the Woodside Connection, respondents showed a preference for a route from Poynters Road/Porz Avenue roundabout to the proposed M1 Jcn11a, with 68 of the 179 respondents (39%) choosing that option. The other two routes, from Woodside to the A5 north of the Chalk Hill roundabout, and from Woodside to the A5120 junction with the A5 to M1 link, had 42 respondents (23%) and 40 respondents (22%) respectively. A further 29 respondents (16%) said that the Woodside Connection should not be provided at all. See Figure A.8 in Appendix 3.

Based on these responses it can be concluded that the majority of respondents felt a road connection between Woodside and the A5-M1 Link was desirable, with a connection to M1 Junction 11a being the preferred option. However, a number of respondents, in particular those that supported a connection to the A5120 commented that, if a key objective of the link was to remove goods vehicles from local roads in Dunstable and Houghton Regis, then a connection to the A5120 was the most logical solution.

Transport schemes

Question 8 of the Issues and Options paper explored potential traffic schemes that could be considered in trying to encourage people to use their cars less. Respondents could pick as many of the options presented as they wished. The most popular response, chosen by 232 respondents (87%), was to make improvements to the public transport network to make it more reliable, efficient, cost-effective and attractive. 166 respondents (62%) recommended that more pedestrian and cycle-only routes should be provided to make walking and cycling safer and easier. Exploring possibilities for park and ride schemes was also a popular option, with 143 respondents (53%) choosing that option. The least popular option, with only 25 respondents (9%) responding positively, was the suggestion to reduce parking provision in new housing developments, to discourage multi-car households. See Figure A.9 in Appendix 3.

Respondents commenting on this question identified the need for public transport to be more frequent, and cheaper, to attract car users. Comments were also made about employee travel plans, perhaps with incentives to encourage staff to use sustainable travel modes, including car sharing schemes. Respondents, including Luton Borough Council, also reiterated the need to ensure sustainable development principles are used in locating employment, community services, jobs, leisure facilities and green spaces are located close to residential developments, with easy walking, cycling and public transport routes linking uses together. It was also stated that easy access should be provided to main transport hubs such as railway stations by public transport, and

APPENDIX

improvements, and possibly extensions, made to station car parks. However, concern was raised regarding the option to increase the cost of town centre parking or reducing the number of spaces, which could deter people from visiting the town centres.

Luton Borough Council drew attention to the need to resolve satisfactorily the issue of local road access to the M1 at junction 11a which is an essential pre-requisite to the provision of efficient and effective transport for the conurbation. This issue of local access is also one of concern to South Bedfordshire District Council. The Borough Council also urged the Committee to ensure that adequate and appropriate transport infrastructure to meet requirements is provided before new development is operational.

Issue 4 - What role will our town centres have?

Do you think we have identified what is important in relation to 'Our Towns'?

For the 'Our Towns' section of the Shape Your Future, householder leaflet, 54% of the 679 respondents who answered this question either agreed or strongly agreed that we had identified what is important in relation to town centre issues, with 20% either disagreeing, or strongly disagreeing. See Figure A.1 in Appendix 3.

Role of our town centres

When asked how we can best enhance our town centres and meet the retail, service and cultural needs of an increased population, two options came out equally popular with respondents. 83 of 244 respondents to this question (34%) recommended distributing additional retail, cultural and leisure development between the existing town centres, but with the majority going to Luton. A further 77 respondents (32%) chose to concentrate additional retail, cultural and leisure development in Luton town centre, and seek to enhance the existing character and appearance of the other town centres. See Figure A.10 in Appendix 3.

Full comments analysis

The majority of the respondents wanted to see new developments within existing town centre locations due to a variety of reasons. The need to increase the retail offer in town centres in order to address the deficiency in the retail hierarchy across Luton and South Bedfordshire emerged very clearly. The view was also expressed that more independent shops should be encouraged into the centres, markets supported and vacant shops utilised. The point was raised by many respondents who saw this to be vital to ensure that the town centres remained an attractive place to visit and to reduce retail leakages to outside the growth area.

Other reasons to support new developments in existing town centre locations include; they would improve vitality and viability especially if they comprised more mixed-use schemes including social, cultural and leisure facilities with residential development and would result in a reduction of traffic elsewhere as services and facilities would be in one location. LSP Luton, Community and Voluntary Action South Bedfordshire, Luton Assembly and Bedfordshire County Council all supported the idea of more mixed-use developments to improve the viability and vitality of the centres. They also considered that it was important to promote the individuality of each town centre to ensure that centres retained their own unique character and be more attractive.

Caddington, Hyde, Slip End and Totternhoe Parish Councils supported the idea for the focus of development on Luton and Dunstable. The NHS Trust supported the idea that Luton should support a range of services with Dunstable and Houghton Regis providing satellite services in terms of medical facilities. Luton Borough Council considers that the type and scale of development with the town centres should reflect their respective roles identified in the Milton Keynes and South Midlands Sub-Regional Strategy and accommodate the demands generated by the proposed growth.

Many comments made in relation to town centres were regarding transport issues. A major concern was that of congestion within the area and the desire for improved traffic flows. One such solution identified was improvements to public transport to improve sustainability within the area, improvements to late night public transport was also seen as important. The use of more ring roads around town centres was also seen as a mechanism to reduce congestion in the town centres. It was considered that improvements to car parks by making them more accessible and cheaper would encourage more people to visit the town centres within the growth area.

The role of Milton Keynes in relation to Luton and Leighton Linslade was reinforced as many respondents stated that they used Milton Keynes for shopping purposes due to cheap parking, easy access by road and rail and the retail variety on offer in comparison to Luton and Dunstable. With regards to the comments made relating to Leighton Linslade, respondents stated that they did not utilise services and facilities in Luton and Dunstable due to the proximity, ease of access and services offered by Milton Keynes.

The use of the internet for shopping purposes was seen as having a great impact on traditional High Street shopping and thus it was important for existing town centres to be enhanced by additional services and facilities. Such measures could include; the retention and maintenance of the character of the town centres; the need for more green and open spaces and improving their accessibility to all people so as not to detract any one group. Bedfordshire County Council supported the idea of providing more green spaces in town centres.

Improved safety as a result of increased anti-social behaviour was seen as a priority to encourage people to use the town centres. This relates to comments made about improvements to the evening economy so that town centres were not seen as 'no-go' areas after dark, instead a place where people wanted to visit due to a range of facilities and services on offer.

Luton Town Centre

A few comments highlighted that Luton was a regional centre and should therefore be the primary focus for new development and regeneration and given the 'proposed' urban extensions to the north of the town, that this would further aid the regeneration in Luton. Comments also related to the redevelopment of large regeneration sites within the town centre, including the reuse and redevelopment of non-functional and vacant buildings. South Bedfordshire LSP saw the regeneration of Luton town centre as being essential.

Comments relating solely to Luton Town Centre also included the need for improvements to the evening economy, including a theatre to make the town centre more attractive to visitors and residents; the need for anti-social behaviour to be addressed and more and cheaper parking to encourage more people to visit the town centre.

Dunstable Town Centre

Most of the comments for Dunstable Town Centre related to the traffic issues within the town centre and the impact this has on the safety of pedestrians and the shopping environment. Some respondents felt that as well as a northern bypass a north-south bypass was also required to ease the congestion experienced in the town centre. It was also considered that the town centre required a 'renaissance' due to the vacant shops and lack of retail, cultural and leisure facilities available. This relates to the point made that there is a lack of variety of retail facilities in Dunstable which does not attract visitors to the centre and that the character of the town centre needed to be maintained and enhanced.

Other comments made sought to see the town centre more attractive so as to encourage more visitors and to make it a more viable and vibrant town centre. Comments included; the need for the provision of more parking which is free and improvements to the evening economy both to attract visitors to the centres (supported by the South Bedfordshire LSP); the need for a rail link to connect Dunstable with Luton and for new developments to improve youth and leisure facilities.

Leighton Linslade Town Centre

From an analysis of the comments made relating to Leighton Linslade it was made apparent that residents of Leighton Linslade primarily used Milton Keynes for comparison shopping purposes due to the range and variety of shops and the ease of parking and travelling to Milton Keynes from Leighton Linslade by either rail or road. Related to this, comments were made emphasising the need for a greater variety of shops within Leighton Linslade. The character of the town centre was highlighted as a positive aspect and hence a need to ensure that this is retained and enhanced. Improvements to the retail sector in Leighton Linslade were seen as essential by South Bedfordshire LSP. The Leighton Linslade Town Council supported any growth and development in line with the Leighton Linslade Big Plan.

Much like the comments made for Dunstable Town Centre, the comments made sought to see improvements to the town centre so as to make it a more attractive town centre. Comments included; the need for new developments to include social and leisure facilities, including a hospital; the development and promotion of tourist attractions; improvements to the evening economy so that residents would not have to travel at night and the need to improve traffic

congestion in the town. Land to the south of the High Street was identified as a potential area for new retail and commercial activities.

Houghton Regis

The need for improvements to the local centre to reduce the need for people to travel elsewhere was seen as a priority for Houghton Regis and it was considered that if an urban extension were to be developed to the north, there would be a benefit for the local centres, due to an increased local population. The Master Plan, yet to be adopted, was seen as a tool to encourage development and investment to bring about much needed regeneration. The regeneration of the local centre was seen as a priority by South Bedfordshire LSP.

Issue 5 - How can our communities and neighbourhoods be more healthy, inclusive and sustainable?

<u>Do you think we have identified what is important in relation to 'Our Communities'?</u>
For the 'Our Communities' section of the Shape Your Future, householder leaflet, 49% of the 661 respondents who answered this question either agreed or strongly agreed that we had identified what is important in relation to our communities, with 23% either disagreeing, or strongly disagreeing. See Figure A.1 in Appendix 3.

Affordable housing

Question 10 in the Core Strategy Issues and Options paper asked respondents if, and how, the affordable housing targets and thresholds for Luton and South Bedfordshire should be amended. 65% of the 230 respondents to this question (149 respondents) said that we should consider different targets and/or thresholds for different types of areas. Keeping the existing targets and thresholds, or having a standard target and threshold across the whole of Luton and South Bedfordshire were less popular options with 48 (21%) and 33 (14%) respondents respectively. See Figure A.11 in Appendix 3.

Affordable housing must take account of economies of scale and different property prices identified between urban and rural areas. The quantity of affordable housing must be needs based and linked closely to the Strategic Housing Market Assessment. There must be a mix of housing for all residents, which is suitable for all local needs (type/size/rented and market housing/etc) and be located near facilities, services and infrastructure and with access to public transport so as to reduce the need of worst off communities to gain access to them. It should be provided for local people and their needs prior to those of people moving to the area.

The development of affordable housing must be in line with government policy and guidance. This applies particularly in terms of mix of housing in terms of tenure and price and support a wide range of households. It must be of a high quality and mixed with other residential uses to support the community. There is also strong concern to ensure that affordable housing will be affordable by the people with low incomes with poor access to jobs/facilities for whom it is intended.

A clear view emerged overall that affordable housing should be distributed across the whole of the Growth Area. It should be located in the villages, as well as the towns and the proposed urban extensions, to support their existence and ensure they are viable, but this must occur on a small scale so as not to spoil their character. There was, however, a minority view opposing affordable housing in the villages (especially Heath and Reach).

Respondents identified a range of target percentages for affordable housing from 35% - 50%. The overall view is to seek the maximum amount of affordable housing provided that it is realistic in terms of viability and hence achievable. Luton Borough Council advocate requiring a minimum of 35% of the new housing to be affordable whilst also looking for this to be exceeded if necessary to meet local needs. The Council also specify that the sizes and types of affordable housing provided should be such that it meets identified local need.

The local councils have differing views as to appropriateness of the targets and thresholds for the villages. Barton Parish Council identifies that the threshold of 15 dwellings or 0.5 hectares is unsuitable for villages and should be reduced.

This view was shared by Harlington Parish Council which would like to see thresholds as low as possible to reduce the deficit of affordable housing locally. The Chilterns AONB Management board also suggest that thresholds be as low as possible to gain adequate levels of affordable housing whereas Totternhoe Parish wishes existing targets to be kept. Caddington, Hyde and Slip End Parish Councils together with Houghton Regis Town Council consider that the amount of affordable

housing should be provided on a site-by-site basis and that targets and thresholds should vary across different communities.

Growth plans must be sustainable to provide affordable homes, which must be spread across small sites and avoid high-rise and high-density developments. Affordable housing provision needs to be brought forward in viable schemes and take "windfall" sites into account. Leighton Linslade Town Council believes targets should be set for affordable housing that are area specific to allow for flexibility and a sustainable housing growth strategy. Bedfordshire County Council identified that it needs to relate to sustainability - car ownership and public transport, services and open spaces, key workers, etc.

Energy efficient design

The option of including a policy that seeks compliance with the Code for Sustainable Homes or BREEAM to a reasonable level received great support through Question 11 of the Issues and Options Paper. 199 of the 241 respondents (83%) supported that approach, with the remaining 42 respondents (17%) saying that we should not seek any minimum level on new developments beyond existing building regulations and national guidelines. See Figure A.12 in Appendix 3.

Many of the comments relating to energy efficient design showed concern that if a policy requiring construction to exceed current building regulations were to be included in the Core Strategy, that it should be sufficiently flexible to ensure that developments remain viable. It was also stated that there should be flexibility to recognise site specific considerations, and to allow for new and emerging technologies. Concern was also raised that meeting more stringent standards could raise costs for construction, creating expensive buildings that people cannot afford. However, it was noted by one respondent that a little more on housing costs now is something that will ensure 60-100 years of asset improvement.

Several respondents strongly supported an approach to require the highest possible levels of energy efficiency, and suggested that all new homes should be built to Code Level 6 from now on. Some respondents, including Leighton Linslade Town Council were more pragmatic and said that they would be prepared to accept development that does not meet the highest standards if developers instead improved the energy efficiency of existing homes. Further to this, it was commented that any policy should be equally applicable to extensions, change of use, conversions, renovations and sub-divisions.

Specifically, the East of England Regional Assembly (EERA) said they are supportive of authorities setting a challenging threshold for compliance with the Code/BREEAM, providing it doesn't adversely affect the implementation of other policies in the East of England Plan. Further, the Environment Agency noted that design of new development should ensure that water consumption does not exceed 105 litres per head per day to meet the Government target of 25% reduction in all new properties.

While a large degree of support was shown for a more stringent policy, many responses raised objections to that approach. It was felt that the sustainable homes issue is not a planning policy issue, and should be addressed through the building regulations system which would give the technical expertise and enforcement powers necessary. It was also suggested that exceeding the current building regulations requirements would cause confusion, and that applying stringent policies in this area would direct investment to other areas with less demanding requirements, thus inhibiting delivery of development.

Renewable energy

Responses to Question 12 of the Issues and Options paper were mixed regarding the debate of whether to exceed the emerging East of England Plan targets for renewable energy generation on new development. 87 of the 231 respondents (38%) recommended that the development size threshold and renewable energy target should be left as set out in the emerging East of England Plan. However, 75 respondents (32%) said that we should have a policy that reduces the site

threshold and increases the renewable energy target from that set out in the emerging East of England Plan. See Figure A.13 in Appendix 3.

Many respondents to this question showed enthusiasm for exceeding the emerging East of England plan proposals for renewable energy generation. Many felt the proposed targets and standards aren't high enough, and should be imposed regardless of site size, with ambitious policies to help us achieve the 'greenest growth area' vision. It was stated that a positive, objective and robust approach to renewable energy should be presented, rather than a restrictive policy. The East of England Regional Assembly showed support for authorities setting challenging targets. They stated that the proposed changes to the East of England Plan are more general about thresholds, and that the 10% target should be seen as a minimum which Local Authorities should look to exceed.

Comments were also made that stressed the link between renewable energy and energy efficient design. It was discussed that a robust energy efficiency policy should be applied in conjunction with a micro-generation policy to reduce the level of energy demand from the outset, to ensure that the overall energy demand over the lifetime of a building is considered.

Again, affordability issues were raised. It was stated that meeting such targets will be too costly until there are advances in technology, and as such targets should be raised in future plans, not now. Being pragmatic, one respondent did say that increased renewable energy targets are preferable, but that needs to be balanced against building costs and the cost to buyers. There were also questions raised over the evidence and justification for these increased measures, and doubt whether there are local circumstances or characteristics that justify higher targets and thresholds.

As with the energy efficiency discussion earlier, it was suggested that a flexible policy would be required, that allowed each development to be judged on its own merits, perhaps with a sliding scale of targets for different size developments and reflecting local circumstances.

Green Space

Question 13 of the Issues and Options paper allowed respondents to choose up to three options for how we should provide formal and informal green space in future urban extensions. Four of the five options offered received significant support. 57% of respondents (139 of the 245 respondents to this question) encouraged the shared use of quality facilities at schools, colleges and community centres. 53% of respondents (130 out of 245) recommended having many small areas of informal green space within neighbourhoods. Options for having more areas of formal green space for pitches etc., and for concentrating informal green space in larger parks, were chosen by 46% and 43% of respondents respectively. See Figure A.14 in Appendix 3.

A clear view that county parks should act as green buffers was made. Plans and policies should go beyond current standards for open space, playing fields and play areas as these only ensure basic provision. Caddington, Hyde and Slip End Parish Councils want to provide informal green space in the form of country parks and Barton Parish Council suggests making greater use of Sundon Hills and Barton Hills. Leighton Linslade Town Council wants formal green space in large, easier to manage parks on the edge of the built-up area and consider that development on the town's eastern edge can provide this.

Existing levels of playing fields should be protected and deficits must be countered. Sports centres and schools could be co-located, share facilities and stay open longer so as to serve the community. These should be linked to well-managed green space for easy access. Provision of sports facilities should not be confused with that of green space as sports facilities only serve a small proportion of the community.

The Chilterns AONB Management Board and Harlington and Totternhoe Parish Councils favour more green spaces and green infrastructure in urban areas, avoiding the periphery and the Chilterns AONB. They should also relate to the size of development including a balance of large, small, formal and informal space in the urban area.

The Environment Agency wants green infrastructure to be planned for at both regional and local levels and to include a mix of new easily accessible formal and informal green space linked with existing provision. This must be provided at the same time as development. The view was also expressed that there is a need to enhance the poor quality of land to the north of Houghton Regis.

Natural England envisages multifunctional landscape with inclusive green infrastructure, formal and informal green space and supports policies encouraging the provision and protection of green open space for community needs. A green infrastructure plan should be produced and delivered by Section 106 agreements. Bedfordshire LSP and Luton Forum support the need for a green infrastructure plan to provide and enhance biodiversity and wildlife corridors.

Several respondents expressed the view that the provision and enhancement of green space and areas supporting biodiversity need protection as Luton is overdeveloped. Such sites should be linked to create an integrated green infrastructure network as small greenways merit preservation and enhancement as corridors to connect wildlife habitats and enhance the landscape character. Caddington, Hyde and Slip End Parish Councils identify that detailed master planning must be used to incorporate green infrastructure and space to ensure they are not provided in a piece-meal approach.

Luton Forum would welcome the inclusion of meadow areas in green spaces to enable children to grow up with wildlife. More facilities for children and teenagers need to be provided through better use of existing green space, to counter smaller green spaces that have or could become problem areas with nuisance youths.

It was suggested that the green belt should be utilised as green space and should be protected in every case. Toddington Parish Council identify a demand for green belt and environmental improvements. South Bedfordshire LSP supports modern village greens and urban green spaces being created as some green belt will be lost. North Hertfordshire District Council considers that a green belt review is a fundamental consideration for the growth area.

Gypsy and Traveller issues

The most popular option chosen in the responses to Question 14 regarding Gypsy and Traveller sites was to seek a mixture of sites for sale and sites for social renting, which 39% of respondents (75 out of a total of 192) chose. However, a further 36% (69) said that a range of sites should be allocated within the existing urban areas and potential urban extensions and that they should be required to be developed and purchased at market value. See Figure A.15 in Appendix 3.

As might be expected, a spectrum of views were expressed with regard to gypsy and traveller provision, with most sympathetic, and a minority hostile, about provision. In terms of tenure, there was recognition that the economics of development necessitate social provision, particularly as part of affordable housing targets. However, travellers themselves often favour small private sties if financially feasible. Many respondents referred to the need for sites to be accessible to a full range of community facilities. There was general support for a spread of provision, but issues were raised regarding integration with existing communities. Advice stressed the avoidance of designated landscapes (e.g. AONB).

With respect to management, site control through effective management is seen as essential. Some saw a role for cost effective transit site provision to help reduce illegal encampment pressure. The need to improve existing sites as well as increasing future provision was also raised.

The East of England Regional Assembly (EERA) referred to the role of the emerging East of England Plan and the need to accommodate 52 pitches (since updated to 60 pitches), via mixed sites for sale and social renting. The Environment Agency stated that the principles of location of gypsy and traveller sites should be the same as for other development. PPS25 Development and Flood Risk classifies gypsy and traveller sites as 'highly vulnerable'. Bedfordshire and Luton NHS Trust support

APPENDIX

the provision of a mixture of sites for sale and social renting, and the importance of ensuring easy access to services, particularly health and education. Natural England stated that location of sites must take into account the proximity to Sites of Special Scientific Interest, and concern over the likelihood and impact of unauthorised encampments. The Chilterns AONB board said that the allocation of sites should be based on need, and be outside the AONB.

What happens next?

The Government Office made a submission which related generally to the process rather than the actual content of the Issues and Options document. The main comments were made as follows:

- ensure that the guidance is followed;
- o there were no sustainability appraisals of the options (N.B. it was always intended that these would follow);
- o an emphasis on the need to spell out why various options are rejected;
- there is no reference to implementation/monitoring (N.B. it was always intended to incorporate these into subsequent documents when there is greater certainty as to the development proposals);
- o keep the core policies and development control policies separate (as specified in the LDS); and
- o pleased to note the progress that has been made.

The next stage in the preparation of the Core Strategy and Key Diagram Development Plan Document is 'Preferred Options'. The outcome of the consultation undertaken during the Issues and Options stage is one of the evidence streams that will feed into deciding on the preferred options for the Core Strategy. Alongside the consultation responses, we will also need to consider the outcome of several key evidence documents that are currently being prepared, or have recently been completed. These include the Employment Land Study, Urban Capacity Study, Strategic Housing Land Availability Assessment, Strategic Flood Risk Assessment, Green Space Strategy, Resource Efficiency Study, Water Cycle Study, Biodiversity/Landscape/Heritage Assessment, Strategic Housing Market Assessment and transport modelling. A Sustainability Appraisal, incorporating a Strategic Environmental Assessment, will be undertaken to help inform the preferred options for the Core Strategy.

It is anticipated that the Preferred Options consultation for the Core Strategy and Key Diagram DPD will be undertaken in Summer 2008.

Demographic Analysis

Respondents to the two shorter questionnaires (i.e. the Shape Your Future householder questionnaire, and the Exhibition questionnaire) were asked various demographic questions to help us analyse the extent to which our consultation reached a wide range of groups, indicative of the general population of Luton and South Bedfordshire. Not all respondents to these questionnaires answered this part of the questionnaire, so the analysis that follows only includes the figures for the respondents that answered that question. It also only includes individuals responding on their own behalf, rather than individuals responding on behalf of a group or forum.

Gender

Of the 891 respondents answering this question, 403 were female (45%) and 486 were male (55%). Two respondents referred to themselves as trans-person.

Age Group

The 25-44, 45-60 and over 60 groups were well-represented, with 34%, 30% and 33% of respondents in those categories respectively. Only six respondents (around 1%) said there were in the under 18 category, however this age group was also consulted through the schools events. 24 respondents (3%) were within the 18-24 category.

Ethnicity

Of the 889 respondents to this question, 802 (90%) of respondents considered themselves to be White (including White-British, White-Irish, and other White background). 3% of respondents classed themselves within the Asian/Asian British group (including Bangladeshi, Indian, Pakistani, Kashmiri and other Asian background). A further 2% classed themselves as Black/Black British (including African, Caribbean and other Black background). Seven respondents (1%) referred to themselves as mixed. A further 38 (4%) classed themselves as 'Other', and one respondent was Chinese.

Disability

87% of respondents answering this question said they had no disability. Of the respondents that did have a disability and indicated what that disability was, 40% experience physical disabilities, 17% have a long-standing illness, and sensory, mental and learning difficulties are experienced by 7%, 6% and 4% of respondents respectively. 8% of respondents said they experience multiple disabilities. 18% answered 'Other' to this question.

Religion

Of the 852 respondents to this question, 587 (69%) classed themselves as Christian. A further 4% (38 individuals) answered this question with 'Other', some of whom specified their religion as Church of England or Catholic/Roman Catholic. 21 respondents (2%) classed themselves as Buddhist, 17 (2%) as Muslim, six (1%) as Jewish and three as Hindu. A further 177 (21%) said they had no religion.

Sexual Orientation

Of the 737 respondents to this question, 720 (98%) classed themselves as heterosexual. Eight respondents were gay men (1%) and seven were bi-sexual (1%). Three respondents classed themselves as a lesbian.

Appendix 1 - List of consultation exhibitions and events

Static Displays	
Dunstable Library	12 th July - 7 th August
Barton-le-Clay Library	18 th July - 5 th September
Leighton Buzzard Library	23 rd July - 5 th August
Houghton Regis Library	12 th July
Leighton Buzzard Citizone	July - 30 th September
Lewsey Community Centre	30 th July - 6 th August
Lewsey Park Pool	30 th July - 6 th August
Wigmore Library	16 th July - 23 rd July
Luton Town Hall	September - October
Wardown Museum	23 rd July - 30 th July
Hightown Sports and Arts Centre	16 th July - 23 rd July
South Bedfordshire District Offices	September - October

Staffed exhibitions	
Dunstable Quadrant	Saturday 30 th June
Jubilee Centre, Marsh Farm	Tuesday 3 rd July
District Offices, Dunstable	Tuesday 3 rd July (evening)
Dunstable Market	Wednesday 4 th July
Dunstable Quadrant	Thursday 5 th July
Jubilee Centre, Marsh Farm	Friday 6 th July
Houghton Regis Carnival	Saturday 7 th July
Luton Arndale Centre	Monday 9 th - Sunday 15 th July
Kingsland Centre, Houghton Regis	Tuesday 10 th July
Bedford Square, Houghton Regis	Thursday 12 th July
Leighton Buzzard Market	Saturday 14 th July
Luton Regional Sports Centre, Stopsley	Tuesday 17 th - Wednesday 18 th July
Houghton Regis Memorial Hall	Tuesday 17 th July (evening)
Morrisons, Leighton Buzzard	Wednesday 18 th July
White House, Leighton Buzzard	Wednesday 18 th July (evening)
Leighton Buzzard railway station	Thursday 19 th July
Sundon Village Hall	Monday 23 rd July (evening)
Chaul End Centre	Monday 23 rd & Wednesday 25 th July
Collingswell Hall, Caddington	Thursday 26 th July (evening)
Toddington Village Hall	Tuesday 31 st July (evening)
Barton-le-Clay Village Hall	Thursday 2 nd August (evening)
St Leonards Church Hall, Heath and Reach	Tuesday 7 th August (evening)
Leighton Buzzard Narrow Gauge Railway, Pages Park	Friday 31 st August
Eaton Bray Village Hall	Tuesday 4 th September (evening)
Harpenden	Wednesday 5 th September (evening)
Offley Village Hall	Wednesday 5 th September (evening)
Eggington Village Hall	Thursday 6 th September (evening)
Leighton Buzzard Steam Festival, Pages Park	Saturday 8 th September
Houghton Regis Medieval Fayre	Saturday 10 th September
Luton Arndale Centre	Monday 10 th - Sunday 16 th September
Hockliffe Lower School	Tuesday 11 th September (evening)
Chalton Village Hall	Wednesday 12 th September (evening)
Wing Village Hall	Thursday 13 th September (evening)

Workshops and Other Events	
South Bedfordshire Equalities Forum	19th June and 18th September
Luton Local Strategic Partnership	2nd August

APPENDIX

31st August
11 th September
12th September
29 th September
9 th October
11th October
16th October
17th October
17 th October
24th October
September/October
2 nd October
15 th October

School Workshops	
Icknield School, Luton	26th September
Putteridge High School, Luton	8th October
Queensbury School, Dunstable	19th October
Manshead School, Dunstable	30th October

Appendix 2 - List of questions in each questionnaire.

Core Strategy Issues and Options Paper questionnaire

<u>Issue 1 - Where will the development go?</u>

Question 1 - Referring to Maps 2.1 - 2.10, which of the ten options for development do you prefer? (pick up to 3 options)

- o Option 1 Development focused within bypasses, minimum land-take
- o Option 2 Development focused within bypasses, maximum land-take
- o Option 3 Development focused within and beyond the bypasses, minimum land-take
- Option 4 Development focused within and beyond the bypasses, maximum land-take
- Option 5 Development focused on maximising proximity to town centres and main employment areas, minimum land-take
- Option 6 Development focused on maximising proximity to town centres and main employment areas, maximum land-take
- Option 7 Development focused on achieving wide distributional spread, minimum land-take
- o Option 8 Development focused on achieving wide distributional spread, maximum land-take
- o Option 9 Development focused on Luton, minimum land-take
- o Option 10 Development focused on Luton, maximum land-take

Question 2 - Please state any changes to the options for development in terms of size or combination of 'potential areas for development' you consider appropriate

Question 3 - When choosing your preferred options for development, which of the following considerations were most important to you? (rank top 3 in order of importance)

- Trying to protect the natural environment and landscape character
- Trying to protect important wildlife and biodiversity areas
- o Minimising the distance to the town centres and other facilities and services
- Concern about the potential for traffic congestions
- o Trying to maximise the benefits of the growth on where I live
- o Trying to minimise the effect of the growth on where I live
- o Concentrating development in bigger urban extensions, to minimise the effect to the wider
- Spreading development more evenly across a wider area
- o Other (please specify)

Question 4 - How should existing village settlements near the edge of the urban area be treated?

- Urban extensions should incorporate the villages close to the urban edge, and integrate them into the new communities
- o Green buffers should be created between new development areas and existing villages

Issue 2 - Where will people work? And in what sorts of jobs?

Question 5 - When planning for the additional jobs needed to help balance the housing growth in Luton and South Bedfordshire, where should we concentrate employment uses?

- Safeguard most existing employment areas, intensify development in those locations and redevelop poor quality employment sites, and look at employment provision on other sites as a last resort
- o Encourage employment development within the proposed urban extensions, with the potential to redevelop existing, poor quality or underused employment sites for other uses.

Issue 3 - How will people travel?

Question 6 - Which of the alternatives for a northern bypass of Luton do you feel we should consider?

- A northern bypass of Luton passing across the narrowest point of the Chilterns AONB between the A6 and the A505
- A northern bypass of Luton passing close to the edge of the Bushmead area between the A6 and A505
- No northern bypass of Luton, but other measures such as traffic calming to encourage people to use appropriate local roads, or park and ride sites to encourage greater use of public transport

Question 7 - Which of the alternatives for the Woodside Connection do you feel we should consider?

- o A route from Poynters Road/Porz Avenue roundabout to the new M1 Junction 11a
- o A route from Woodside to the A5 north of the Chalk Hill roundabout
- o A route from Woodside to the A5120 junction with the A5 to M1 link
- Not providing the Woodside Connection

Question 8 - Which of these schemes or ideas do you feel we should consider, in trying to encourage people to use their cars less? (tick as many as you wish)

- Make improvements to the public transport network to make it more reliable, efficient, costeffective and attractive
- Reduce parking provision in new housing developments to discourage multi-car households
- Reduce car parking provision and/or make parking more expensive in town centres, to encourage people to use public transport, or to cycle or walk into town
- o Provide more pedestrian and cycle only routes to make walking and cycling safer and easier
- Provide more dedicated bus-ways/bus lanes to make bus journeys quicker
- o Pursue the provision of park-and-ride facilities, to reduce congestion in our town centres
- Other (please specify)

Issue 4 - What role will our town centres have?

Question 9 - How can we best enhance our town centres and meet the retail, service and cultural needs of an increased population?

- o Concentrate additional retail, cultural and leisure development in Luton town centre, and seek to enhance the existing character and appearance of the other town centres
- Distribute additional retail, cultural and leisure development between the existing town centres, but with the majority going to Luton
- Concentrate additional retail, cultural and leisure development in Luton town centre, and seek to change the function and character of the other town centres so that all centres complement one another
- Other (please specify)

<u>Issue 5 - How can our communities and neighbourhoods be more healthy, inclusive and sustainable?</u>

Question 10 - Should the affordable housing targets and thresholds for Luton and South Bedfordshire be amended? Which options should we consider?

- o Keep the existing targets and thresholds for Luton and South Bedfordshire
- Have a standard target and threshold across the whole of Luton and South Bedfordshire
- Consider different targets and/or thresholds for different areas (e.g. town centres, other urban areas, villages or greenfield sites)

Question 11 - Should our Core Strategy include a policy that seeks all new development to exceed basic Building Control regulations in terms of energy efficiency and sustainability, and meet standards set out in the Code for Sustainable Homes or BREEAM for non-residential buildings?

- o Not seek any minimum Code for Sustainable Homes or BREEAM ratings on new developments
- o Include a policy that seeks compliance with the Code for Sustainable Homes or BREEAM to a reasonable level (e.g. Code Level 3 or 4)

Question 12 - Should renewable energy and energy-efficiency policies in the Local Development Framework go beyond the targets and thresholds put forward in the emerging East of England Plan? We could consider:

- Leaving the development size threshold and renewable energy target as set out in the emerging East of England Plan
- o Lowering the development size threshold to include more new developments (e.g. developments of 30 dwellings or 750 sg.m.)
- Increasing the renewable energy target above 10%, but keeping the East of England Plan site threshold
- o A combination of lowering the site threshold and increasing the renewable energy target

Question 13 - How would you like to see formal and informal green space be provided in the future urban extensions? (tick up to three boxes)

- Combine formal green space provision serving a large area into one or two large sites, with more facilities (all-weather pitches, floodlighting etc.) and better management
- o Have more areas of formal green space, similar to traditional provision, with a number of pitches/fields per area, related to the size of development
- o Encourage shared use of quality facilities at schools and colleges, and community centres
- Have many small areas of informal green space within neighbourhoods
- Concentrate informal green space provision in larger parks at the edge of the built-up area, along a country park type model

Question 14 - When considering the location and delivery of land for additional Gypsy and Traveller sites, which approaches should we consider?

- Allocate a range of sites within the existing urban areas and potential urban extensions and require them to be developed and purchased at market value
- Encourage sites to be provided by Registered Social Landlords and other developers as part of their contribution to affordable housing, secured through planning obligations
- Seek a mixture of sites for sale and sites for social renting

Shape Your Future leaflet householder questionnaire

Question 1 - Our Growth - where will the development go?

Do you think we have identified what is important in relation to our growth?

- o Strongly agree
- o Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Question 2 - Our Economy - where will people work? And in what sorts of jobs?

Do you think we have identified what is important in relation to our economy?

- Strongly agree
- o Agree
- Neither agree nor disagree
- o Disagree
- Strongly disagree

Question 3 - Congestion - how will people travel?

Do you think we have identified what is important in relation to our economy?

- Strongly agree
- o Agree
- o Neither agree nor disagree
- o Disagree
- Strongly disagree

Question 4 - Our Towns - what role will our town centres have?

Do you think we have identified what is important in relation to our town centres?

- Strongly agreeAgree
- Neither agree nor disagree
- o Disagree
- Strongly disagree

Question 5 - Our Communities - how can our communities and neighbourhoods be more inclusive, sustainable and healthy?

Do you think we have identified what is important in relation to our communities?

- o Strongly agree
- o Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Question 6 - What are the most important things we should consider when we plan the **growth?** (choose up to three issues and rank them in order of importance)

- o Climate change and being a green growth area
- o Protecting the natural environment and landscape character
- o Using as little of the green belt as possible
- o Traffic congestion
- o Protect important wildlife and biodiversity areas
- o Our safety
- o Better public transport
- Access to services
- Innovative design and buildings
- o Green spaces as buffers around new developments
- Our town centres

- o The impact on our health
- Access to local jobs
- o Something else? (please write in)

Exhibition questionnaire

Question 1 - Which of map options 1 to 10 do you prefer?

- o Option 1
- o Option 2
- o Option 3
- o Option 4
- o Option 5
- o Option 6
- o Option 7
- o Option 8
- o Option 9
- o Option 10
- None of the options

Question 2 - Which of the following was most important in reaching this decision?

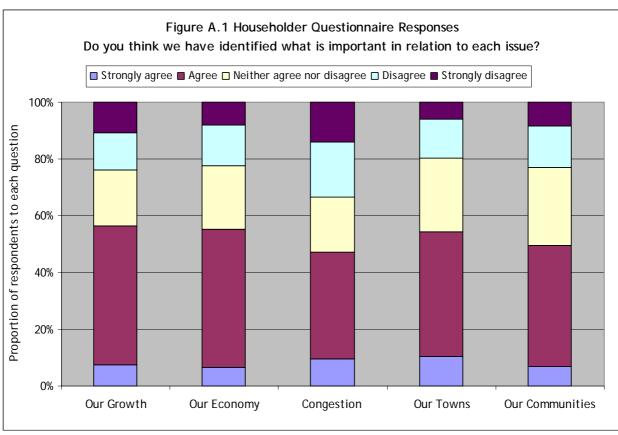
(choose up to three issues and rank them in order of importance)

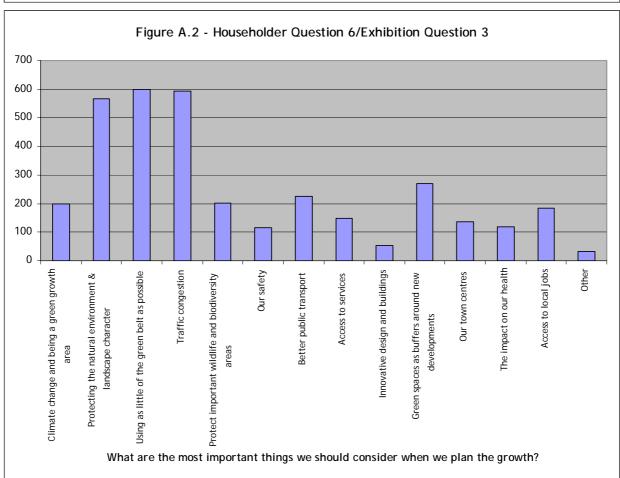
- o Protecting the natural environment and areas of sensitive landscape character
- o Concern about the potential traffic congestion
- o Using as little green belt as possible
- o Minimising the distance to the town centres and other service facilities
- o Trying to maximise the benefits of growth on where I live
- o Trying to minimise the effect of growth on where I live
- o Concentrating development in bigger developments to focus the impact
- Spreading development more evenly across the wider area
- Minimising development in and around villages
- o Maximising development in and around villages
- o Other

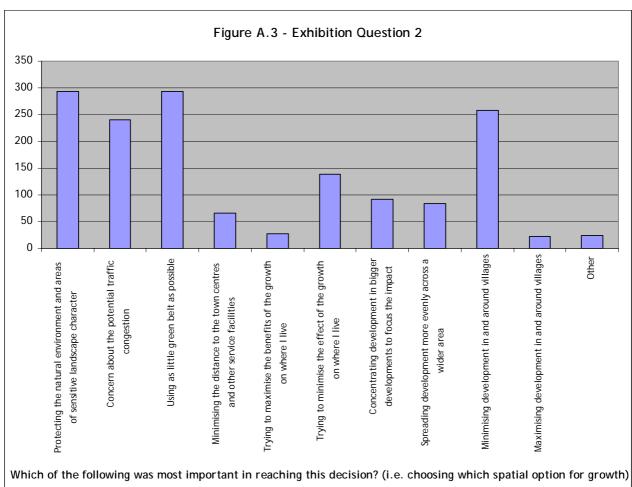
Question 3 - What are the most important things we should consider when we plan the growth? (choose up to three issues and rank them in order of importance)

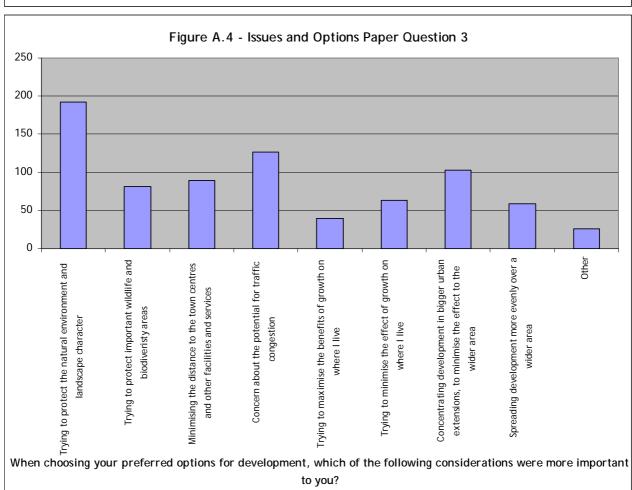
- o Climate change and being a green growth area
- o Protecting the natural environment and landscape character
- o Using as little of the green belt as possible
- Traffic congestion
- Protect important wildlife and biodiversity areas
- Our safety
- Better public transport
- o Access to services
- Innovative design and buildings
- o Green spaces as buffers around new developments
- o Our town centres
- o The impact on our health
- Access to local jobs
- o Something else? (please write in)

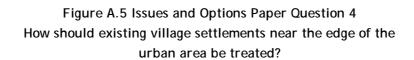
Appendix 3 - Relevant charts











- Urban extensions should incorporate the villages close to the urban edge, and integrate them into the new communities
- Green buffers should be created between new development areas and existing villages

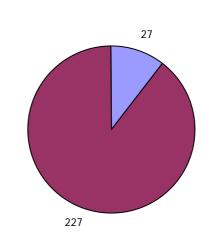


Figure A.6 Issues and Options Paper Question 5 Where should we concentrate employment uses?

- Safeguard most existing areas, intensify development, and look at provision on other sites as a last resort
- Encourage employment development within proposed urban extensions, with potential to redevelop existing sites for other uses

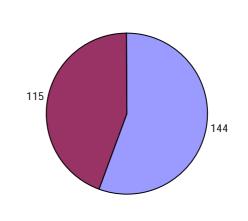


Figure A.7 Issues and Options Paper Question 6 Which of the alternatives for a northern bypass of Luton do you feel we should consider?

- A northern bypass of Luton passing across the narrowest point of the Chilterns AONB between the A6 and the A505
- A northern bypass of Luton passing close to the edge of the Bushmead area between the A6 and A505
- No northern bypass of Luton, but other measures etc

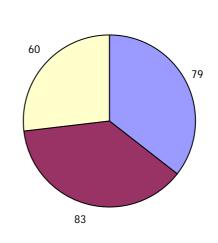
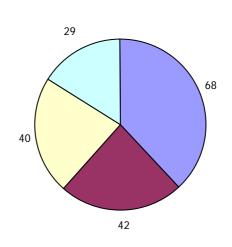
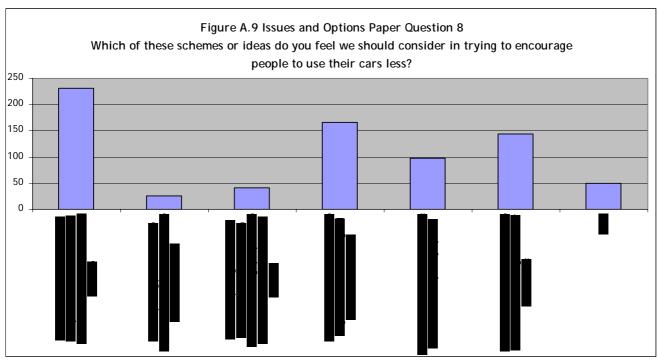
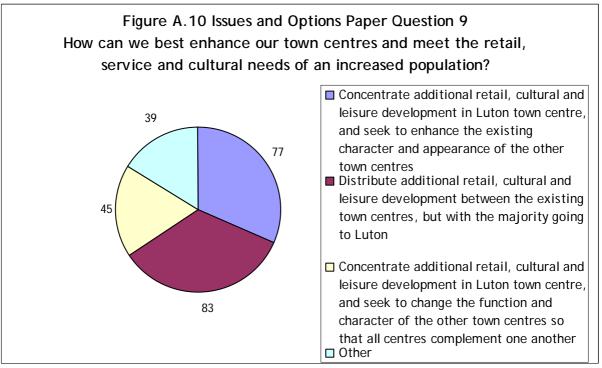


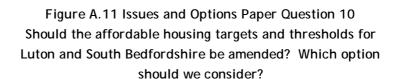
Figure A.8 Issues and Options Paper Question 7 Which of the alternatives for the Woodside Connection do you feel we should consider?

- A route from Poynters Road/Porz Ave roundabout to the new M1 J11a
- A route from Woodside to the A5 north of the Chalk Hill roundabout
- ☐ A route from Woodside to the A5120 junction with the A5 to M1 link
- Not providing the Woodside Connection









- Keep the existing targets and thresholds for Luton and South Bedfordshire
- Have a standard target and threshold across the whole of Luton and South Bedfordshire
- Consider different targets and/or thresholds, for different areas

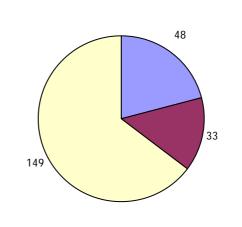
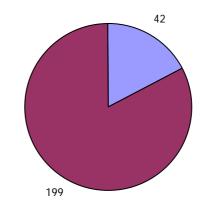
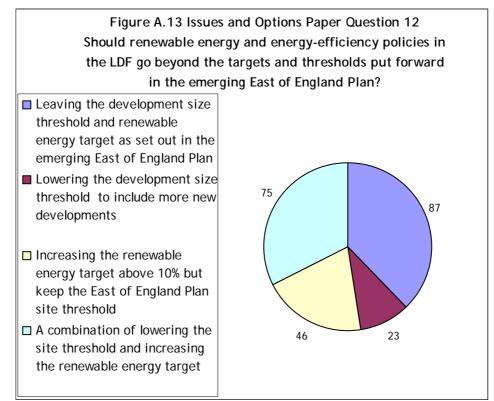


Figure A.12 Issues and Options Paper Question 11 Should we include a policy that seeks to exceed basic building regulations, and meet Code for Sustainable

Homes/BREEAM?

- Not seek any minimum Code for Sustainable Homes or BREEAM ratings on new developments
- Include a policy that seeks compliance with Code/BREEAM toa reasonable level





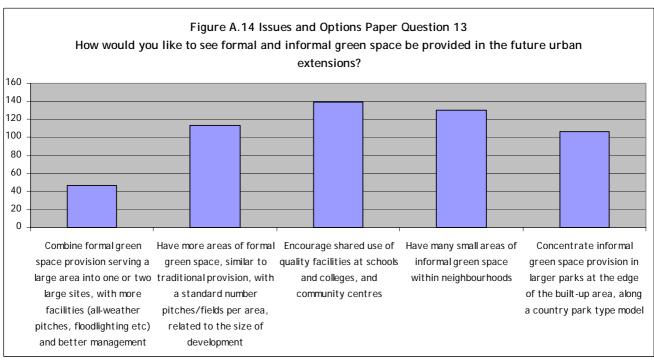


Figure A.15 Issues and Options Paper Question 14
When considering the location and delivery of land for additional Gypsy and Traveller sites, which approaches should we consider?

- Allocate a range of sites
 within the existing urban
 areas and potential urban
 extensions and require them
 to be developed and
 purchased at market value
 Encourage sites to be
- Encourage sites to be provided by RSLs and other developers as part of their contribution to affordable housing, secured through planning obligations
- Seek a mixture of sites for sale and sites for social renting

