

For: (x) <table border="1" style="width: 100%;"> <tr> <td style="width: 80%;">Executive</td> <td style="width: 20%; text-align: center;">X</td> </tr> <tr> <td>CLMT</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> Meeting Date: 15 th April 2013 Report of: Head of Planning & Transportation Report author: Kevin Owen	Executive	X	CLMT	<input type="checkbox"/>	Agenda Item Number: 12
Executive	X				
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Subject: Luton Borough Council's response to Central Bedfordshire Council's Pre-submission Development Strategy consultation January 2013 and matters relating to the Sustainable Urban Extension Houghton Regis North 1 (HRN1) planning application consultation (For Executive Only) Lead Executive Member(s): Sian Timoney Wards Affected: All	<u>Consultations:</u> Councillors (x) <input type="checkbox"/> Scrutiny x Stakeholders <input type="checkbox"/> Others <input type="checkbox"/>
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Recommendation

1. That this report be approved as the formal basis for responding to Central Bedfordshire on their Pre-submission Development Strategy (January 2013) and the Sustainable Urban Extension Houghton Regis North (HRN1).

Background

2. This consultation response follows representations sent previously to Central Bedfordshire on their emerging draft Development Strategy (in August 2012). Subsequently, the Pre-submission Development Strategy (Pre-submission plan) was published on the 14th of January 2013 for public consultation which closed on Monday 25th February 2013.
3. At the same time, Central Bedfordshire has consulted on the Sustainable Urban Extension Houghton Regis North 1 (HRN1) planning application and this consultation has now closed.
4. A report setting out the Council's response to these consultations was prepared for the Executive of 11th February but was withdrawn from the agenda following discussions between Luton and Central Bedfordshire on the content of both these documents which lead to Central Bedfordshire extending the period of time for Luton to respond until the 19th of April. Ongoing discussions have been taking place between officers and Members from both authorities to identify and address key issues of concern particularly around access to affordable housing and mitigating transport impacts.
5. These significant discussions are on-going. A draft of this report will be circulated to all Members of the Overview and Scrutiny Board (O&SB) in order that their views can be taken into account with this report at the Executive meeting on 15th April.

The current position

Summary of comments

- i. Luton's comments on these documents are based on the assumption and expectation of a successful outcome of the comprehensive process of sharing information and dialogue

around strategic cross-border issues which is taking place.

- ii. In particular Luton welcomes the discussions which are on-going regarding: a) the opportunity for Luton residents to access up to 50% of affordable housing provided on the two strategic allocations being planned for at land North of Houghton Regis and land North of Luton and b) the joint collaborative approach to transport assessment and mitigation of the development proposals contained in the documents.
- iii. Luton welcomes the explicit inclusion within the Development Strategy of a commitment to provide additional housing to meet a large amount of Luton's likely unmet housing need given its tight boundaries and overall supply of housing.
- iv. Luton's main concern regarding both the Development Strategy and the Houghton Regis application is to ensure that the significant amount of development to be located close to the conurbation is sustainable on social, environmental and economic grounds. This is necessary for several reasons. Firstly it needs to address the social needs for affordable housing within the conurbation as a whole as set out in the jointly commissioned Strategic Housing Market Assessment. Secondly it is needed in order to demonstrate under the duty to cooperate how this development will help to address the principle element of unmet need within Luton i.e. that of affordable housing. Thirdly, unless these developments address the wider needs of the conurbation including affordable housing it is considered that it will not meet the criteria for removal from the Green Belt.
- v. The transport impact of major amounts of development contained in these documents on Luton's border is of considerable concern and Luton welcomes the ongoing dialogue on transport issues in relation to transport assessment and the identification of mitigation strategies. In particular Luton seeks further clarification and assurances about the phased delivery of transport infrastructure prior to significant development taking place, along with a package of clear mitigation measures to address the impacts from transport movements onto Luton's road network. This would include specified elements of infrastructure and agreed mitigation measures being delivered against mutually agreed traffic thresholds.
- vi. Luton remains of the view that the quantum of both convenience (food) and comparison floorspace proposed within the North Houghton Regis application is significantly larger than is appropriate for a development of this scale in such close proximity to Luton town centre and other centres, particularly in the north of the borough. This poses a significant risk to the overall health, vitality and viability of Luton town centre, other smaller centres but also those centres within Central Bedfordshire such as Dunstable town centre and Houghton Regis town centre in close proximity to the development.
- vii. Luton previous comments in September requested that Central Bedfordshire should look carefully at all options for accommodating additional growth to the west of Luton due to its proximity to areas of particular housing shortage within Luton. Luton is of the view that this exercise has not been undertaken in a meaningful way.
- viii. Luton will continue ongoing dialogue with other neighbouring local authorities – principally North Hertfordshire District Council - under the duty to cooperate to address strategic cross-boundary issues, including how to address Luton's unmet housing need as well as the infrastructure required, given's Luton key role in the wider-sub regional economy.
- ix. This report gives conditional support to Central Bedfordshire's pre-submission development strategy and the Houghton Regis application on the clear assumption that a) ongoing negotiations over access to up to 50% of affordable housing delivered in the urban

extensions of Houghton Regis and North of Luton will be successful in delivering a significant quantum of affordable housing for Luton's residents b) that Luton receives adequate commitment to a phased delivery of transport infrastructure prior to significant development taking place in close proximity to its borders, along with a package of clear mitigation measures to address the impacts from transport movements onto Luton's road network and c) that the quantum of retail floorspace to be located within the Houghton Regis urban extension is significantly reduced.

- x. If the discussions on access to a significant amount of affordable housing are not successful then Luton has a fundamental objection to both development strategy and the Houghton Regis application. Failure to secure access to affordable housing provision for Luton's residents within the two proposed urban extensions would mean that there will be very limited other ways to address Luton's acute housing needs. In this eventuality Luton would be of the view that the Development strategy itself and any subsequent applications would be fundamentally flawed and unacceptable. It would not be sustainable on social grounds and despite Luton making it clear that it cannot address the affordable housing needs of its borough within its boundaries, this plan will be proposing considerable growth on the immediate borders of Luton without doing anything to address the most significant single issue facing its neighbour. In this eventuality it is considered that the justification for removing this land from the Green Belt would be so fundamentally flawed to be legally erroneous.
- xi. Likewise if Luton does not receive adequate commitment to a phased delivery of transport infrastructure prior to significant development taking place in close proximity to its borders, along with a package of clear mitigation measures to address the impacts from transport movements onto Luton's road network, this would also mean Luton has a key objection to both documents.
- xii. In addition if the quantum of retail floorspace in the Houghton Regis application is not significantly reduced Luton will have an objection to this aspect of the application on the grounds that it will have an unacceptable impact on the vitality and viability of Luton Town centre and other smaller centres particularly in the north of the borough.

Report

- 6. Central Bedfordshire Council has published a Pre submission plan for consultation which sets out a strategy and development management policies to shape future growth and development for the whole of Central Bedfordshire for the next 20 years (2011-31). The Pre submission plan housing target assumes that migration out of Luton will continue at trend levels and therefore makes sufficient allowance for this within its urban extensions. A 'corner stone' of delivering that strategy is the Houghton Regis North Strategic Allocation and an outline application has now been submitted to Central Bedfordshire and is subject to consultation.

Migration

- 7. The position on Luton's high levels of housing need and particularly affordable need, are clearly set out in the Strategic housing Market Assessment (2012) jointly commissioned with Central Bedfordshire. The Pre submission plan assumes the joint SHMA 'trend migration' scenario which indicates that Luton itself, needs to plan for 11,000 households (rounded figures) whereas, this scenario allows for the outward migration of approximately 10,000 Luton households into Central Bedfordshire over the plan period. These Luton residents will be those who can afford to buy a property on the open market and will therefore, be able to find quality housing outside Luton's boundaries.

8. If Luton only provided for locally arising needs (i.e. a net nil migration forecast showing natural increase in the population due to births and deaths), this would suggest the need to plan for 18,000 households. However, the national guidance requires local authorities to adequately plan for migration patterns and so the net nil figure can only be indicative to show the internal scale of demographic pressure the town is likely to face if migration wasn't a factor.

Housing & Affordable Housing

9. The joint SHMA also shows that to deliver Luton's affordable housing needs, some 60% of Luton's 11,000 dwellings would need to be secured as affordable housing (i.e. approximately 6,600 dwellings). Based on current urban capacity work for Luton's local plan, this affordable housing figure is bigger than Luton's likely overall housing capacity.
10. Evidence studies on the viability of housing development in Luton, show that it will be unlikely that more than a 20% affordable housing contribution can be delivered on sites across the town. This means that based on Luton's expected overall housing capacity, it is very unlikely that more than 1,200 affordable dwellings will be delivered within the borough over the plan period – even with efforts being made by Luton to directly increase the delivery within the borough. This figure represents less than 20% of Luton's defined affordable housing need as set out in the joint Luton and Central Bedfordshire SHMA 2012.
11. Ongoing work on the capacity of Luton indicates restricted development opportunities with potentially only space for 6,200 dwellings coming forward over the plan period 2011-2031. The work indicates that Luton is likely to have a potential unmet housing need of around 4,800 dwellings over the plan period (compared against the trend migration scenario of 11,000 households). This means that that under the duty to cooperate Central Bedfordshire's Pre submission plan should address a large proportion of this unmet need (given it surrounds Luton on about 80% of its border). However Luton is also seeking contributions from other neighbouring authorities.
12. Central Bedfordshire's Housing Technical Paper indicates that their plan housing target will be higher than their actual housing need based on recently revised ONS data. This excess could be as much as 3,500 dwellings but Central Bedfordshire considers that this would help neighbouring authorities (principally Luton) with their unmet needs. Luton therefore acknowledges that the Central Bedfordshire Development Strategy is providing growth which will help to address some of Luton's unmet housing need.
13. If Luton secured all of this extra 3,500 dwelling provision then approximately 1,300 dwellings would remain to be found though negotiation with other neighbouring authorities. In reality, it is difficult to be so precise where most of these properties will be on the open market, but in planning terms, such calculations will be accepted in deriving housing targets for a sound plan. This does however just serve to emphasise the need to also secure access to affordable housing within immediately neighbouring areas.
14. The housing chapter as currently drafted does not adequately reflect the 'duty to cooperate' in relation to Luton's clearly identified position of its likely level of unmet housing and affordable housing need. This chapter contrasts sharply to the employment chapter which does cover at some length the 'duty to cooperate' with Luton over the provision of employment land. However, as part of the ongoing dialogue with Central Bedfordshire, Luton is collaborating on how to amend the drafting of their Pre submission plan to include access for Luton residents for up to 50% of the affordable housing delivered within the two strategic allocations.

15. It has been suggested that Luton should use more of its employment land to accommodate its unmet housing need. However, Luton's employment land study has made clear that Luton needs to retain the vast majority of its existing and allocated employment land to meet the expected job creation level of 18,000 jobs and projected office and industrial development over the next 20 years. The study makes clear the role Luton currently plays in the wider sub regional economy and its strategic importance for delivering quality employment and economic expansion, associated with key drivers such as the airport and major transport connectivity. Indeed approximately 20% of the residents in the southern part of Central Bedfordshire rely on employment within Luton.
16. Whilst some employment land is intended to be used for housing as part of the Local Plan, the idea of using significantly more employment land for housing is unworkable for two reasons. Firstly because it would still not go anywhere near addressing the overall housing requirements for Luton. Secondly such an approach would destroy the future economic potential of both Luton and the wider sub-regional economy.

Other key issues

17. The key issues raised with Central Bedfordshire (further expanded on in Appendix 1) are summarised below.
18. As currently drafted the material on **neighbourhood plans** does not provide adequate safeguards to require them to accommodate delivery of cross boundary objectives set under the duty to cooperate (in accordance with the National Planning Policy Framework). This is particularly relevant to the Caddington and Slip End area. Luton's previous comments identified that Central Bedfordshire should look carefully at all options for accommodating additional growth to the west of Luton due to its proximity to areas of particular housing shortage within Luton. Luton is of the view that this exercise has not been undertaken in a meaningful way.
19. The **transport** impact of major amounts of development contained in both the Development Strategy and the Houghton Regis application on Luton's border is of considerable concern and Luton welcomes the ongoing dialogue on transport issues in relation to transport assessment and the identification of mitigation strategies. However so far Luton feels it has received insufficient detail and reassurances on delivering the necessary strategic infrastructure as well as inadequate clarity on mitigation and safeguards on any phased development impacting on local roads.
20. As part of the conditional support for these proposals Luton urgently seeks further clarification and assurances about the phased delivery of transport infrastructure prior to significant development taking place, along with a package of clear mitigation measures to address the impacts from transport movements onto Luton's' road network. This would include specified elements of infrastructure and agreed mitigation measures being delivered against mutually agreed traffic thresholds.
21. Junctions which will in particular require mitigation include: Legrave High Street/Lewsey Road; Legrave High Street/Pastures Way and Sundon Road/Sundon Park Road. We also wish to see a clear mitigation strategy for Pastures Way Tomlinson Avenue.
22. Luton remains of the view that the quantum of **retail** for both convenience (food) and comparison floorspace proposed within the North Houghton Regis application is significantly larger than is appropriate for a development of this scale in such close proximity to Luton town centre and other centres, particularly in the north of the borough. This poses a significant risk to the overall health, vitality and viability of Luton town centre, other smaller centres but also those centres within Central Bedfordshire such as Dunstable town centre and Houghton Regis town centre in close

proximity to the development.

23. Central Bedfordshire's own retail impact assessment (accompanying the Sustainable Urban Extension Houghton Regis North (site 1) planning application) lists the percentage of diverted trade from these centres and Luton's view is that these are unacceptable. Luton considers that the retail provision at this location should be significantly reduced in scale in order to avoid the impacts described on neighbouring town and local centres. Luton's own convenience floor space provision over the whole plan period is recommended to be 8,368 square metres, focussed sequentially at sites within the town centre. In addition it does not propose any comparison retail floor space to be located outside Luton town centre and Luton questions the need for any comparison floor space in what is intended to be at the most a district centre in the Houghton Regis urban extension.

24. Luton also considers that in the master planning of the north of Luton urban extension the development should include a 250m wide "green lung" along the urban edge to protect the amenity of residents living on the urban boundary.

Conclusions

25. This report gives conditional support to Central Bedfordshire's pre-submission development strategy and the Houghton Regis application on the clear assumption that a) ongoing negotiations over access to up to 50% of affordable housing delivered in the urban extensions of Houghton Regis and North of Luton will be successful in delivering a significant quantum of affordable housing for Luton's residents b) that Luton receives adequate commitment to a phased delivery of transport infrastructure prior to significant development taking place in close proximity to its borders, along with a package of clear mitigation measures to address the impacts from transport movements onto Luton's' road network, and c) that the quantum of retail floorspace within the Houghton Regis application is significantly reduced.

26. If the discussions on access to affordable housing are not successful then Luton has a fundamental objection to the development strategy and application for the reasons stated in this report.

27. Likewise if Luton does not receive adequate commitment to a phased delivery of transport infrastructure prior to significant development taking place in close proximity to its borders, along with a package of clear mitigation measures to address the impacts from transport movements onto Luton's' road network, this would also mean Luton has a key objection to both documents.

28. Luton also feels that the quantum of retail development contained in the Houghton Regis application is too large and will have significant impacts on both Luton town centre and other smaller centres in the north of the borough.

Goals and Objectives

To ensure that the housing needs of the Borough are met without the risk of town cramming, through cooperation with neighbouring Local authorities on how any unmet needs in Luton can be accommodated sustainably close to the Borough boundary.

Proposal

That this response be submitted as the Borough Council's formal response.

Key Risks

The Borough Council can choose not to respond – however under the duty to cooperate (Localism Act 2011) this may result in the unsound preparation of Luton's own Local Plan, by failing to negotiate

with neighbouring councils on strategic (cross boundary) planning issues. An unsound plan would leave the borough council vulnerable to the 'presumption in favour of sustainable development' under national policy, which may lead to unsound planning decisions.
Consultations – this report has been circulated to Members of the Overview and Scrutiny Board for their views (due to their next meeting being held after the Executive meeting considering this report) and the Executive will be up-dated on comments received.
Appendices attached:
Appendix 1: Summary of the Proposed Development Strategy for Central Bedfordshire 2011- 2031
Background Papers:

IMPLICATIONS:

		Clearance – agreed by:
Legal	There are legal implications for the Borough Council under the 'duty to cooperate' (Localism Act 2011). The Borough Council needs to ensure that preparation of its own Local Plan is found sound by making a response to Central Bedfordshire on their plan preparation.	John Secker, Legal Services 25.01.13
Finance	While there are no immediate financial implications arising from this report, the proposed new system of local government finance means that this Development Strategy will have a significant long-term financial impact on Luton. The comments made in relation to Luton's needs are very important to its financial position, as the maintenance of Luton's retail hierarchy and further urban regeneration will be essential for the Council's financial position in future. This is because the government is proposing a new financial system in which authorities retain a proportion of new business rates income to replace grant currently received by the Council.	Darren Lambert, Finance Manager for Environment & Regeneration on 24.01.13

Integrated Impact Assessment (IIA) – Key Points

Equalities/ Cohesion/Inclusion (Social Justice)	<p>There are potential equalities implications. It is in the interests of the Borough Council and the health and wellbeing of its citizens, that adequate account is taken by Central Bedfordshire of Luton's social and economic needs where they cannot be met within the Borough boundary. Central Bedfordshire undertook a comprehensive impact assessment which can be found at the following link;</p> <p>http://www.centralbedfordshire.gov.uk/Images/Equalities%20Impact%20Assessment_tcm6-32025.pdf#False</p> <p>Whilst within the assessment it uses information pertaining to Luton/Bedfordshire statistics the</p>	Agreed; Sandra Legate Equality and Diversity Policy Manager 24.01.13
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	<p>impact on Luton as a neighbouring authority is not fully discussed and the impact only deals directly with the impact on Central Bedfordshire Residents. The Consultation from Luton Borough Council identifies concerns and are identified within this Executive report.</p>	
Environment	<p>There are potentially direct environmental implications. Adequate account should be taken by Central Bedfordshire of Luton's limited environmental capacity to accommodate development and also potential cross boundary development impacts of urban extensions on Luton's environment.</p>	<p>Agreed by the Strategy & Sustainability Manager on 28.01.13</p>
Health	<p>There are potential health implications. It is in the interests of the Borough Council and the health and wellbeing of its citizens, that adequate account is taken by Central Bedfordshire of Luton's health needs where they cannot be met within the Borough boundary.</p> <p>There is a recommended that a full more robust impact assessment be conducted on the development plan from Central Beds - which includes assessing the impact on inequalities in health, an issue more pertinent to Luton. In addition, the assessment should include issues relating to primary care services and how Luton's primary care estates will be impacted upon if some of Luton's housing needs are to be met by Central Beds development strategy. It is highly recommended that a health impact assessment is conducted on Central Beds Development Strategy to ensure that all health consideration are covered if it is not possible to undertake an integrated assessment in the first instance.</p>	<p>Chimeme Egbutah (Advanced Health Improvement Specialist) Public Health 24.01.13</p>
Community Safety	<p>There are potential community safety implications. It is in the interests of the Borough Council and the health and wellbeing of its citizens, that adequate account is taken by Central Bedfordshire of Luton's community needs where they cannot be met within the Borough boundary and also potential cross boundary development impacts of urban extensions on the safety of Luton's environment and service infrastructure. We would expect Central Bedfordshire to ensure that any future developments seek to minimise opportunities for crime and/or anti-social behaviour issues to manifest.</p>	<p>Vicky Hawkes on 24.01.13</p>
Staffing	<p>There are no staffing implications.</p>	
Other	<p>None</p>	
FOR EXECUTIVE ONLY - Options:		

How Current Version of the Pre-submission plan has addressed issues raised by Luton Borough Council in its previous consultation response.

29. The summary of Luton's response sent on 10th September is included in bold text and is set against a commentary summarising in italics of how the latest version of the plan has dealt with these comments or issues.
30. It is acknowledged that dialogue is continuing on how some elements of the plan can be amended to address some of the key points set out below. However this appendix is intended to catalogue the current position in case further progress is not made at addressing Luton's concerns in the next stage of the plan.

Source: Luton Borough Council's response to Central Bedfordshire Council's 'Draft Development Strategy'; Summary of Comments: clauses I to X (Executive Report 10th September 2012):-

1. Luton Borough Council:-

- I. welcomes the proposed Development Strategy for Central Bedfordshire which proposes significant level of development to deliver sustainable new communities close to Luton;**
- II. request consistency and clarity within the various documents on how unmet needs of neighbouring areas will be met in order to fulfil its obligations set out in the National Planning Policy Framework under the "duty to cooperate";**
 - The Central Beds plan introduction states that the council has worked closely with Luton and neighbouring authorities (para 1.10)*
 - Current version has no express recognition of Luton's unmet needs set out in the vision or within the 8 strategic objectives (pages 13 to 15)*
 - However, reference has been added to objective 1 to emphasise: regenerating Dunstable and Houghton Regis as well as the 'the wider urban conurbation'*
 - Affordable housing target has been reduced from 35% to 30%*
 - Clarification has been added to Objective 2 that "a variety of housing types and sizes will be provided, including larger family homes"*
 - The 'Development Strategy' para 5.5 retains an assertion that (ref: Housing Technical Paper) the proposed housing distribution recognises the role of migration into the south of the area where need arises, particularly from Luton*
- III. advises that Luton is likely to face an unmet need of between 5,000 to 12,000 dwellings over the next 20 years (given its estimated overall capacity within Luton of approximately 6,000 dwellings during that period) and that it looks forward to a continuing dialogue with both Central Bedfordshire and North Hertfordshire as to how this need will be addressed;**
 - The 'Strategy for Growth' section as drafted emphasises meeting continuing trends in terms of births, deaths and migration; indeed "the council is not seeking to encourage migration into their area" but will plan for the trend;*
 - Currently no specific reference to Luton's unmet needs has been made in the Housing Chapter 10 other than adding reference to the 'duty to cooperate with neighbouring authorities' in determining the housing requirement;*
 - Emphasis is placed on meeting the growing needs of the elderly, arising in Central Bedfordshire;*
 - Currently no significant alteration is made within the plan that identifies or makes any specific provision to meet Luton's potential scale of unmet housing need or recognition of the scale of*

affordable housing intervention required. In fact the 35% affordable housing target has been reduced to 30% without sufficient explanation.

- IV. supports the proposed scale of urban extensions but seeks clarification of the proposed housing mix, size and tenure and how this will address housing needs across the housing market areas compared to the Development Strategy's emphasis being placed on larger family sized accommodation;**
- Strategic objective 2 has been amended to makes provision for a variety of sizes and types of housing, including larger family homes. The affordable housing target has been reduced from 35% to 30%. While the urban extension policies now include this clarification, no affordable target of 30% affordable is included.*
- V. urges consideration be given to looking at all possibilities for extra growth near to Luton, including to the west, in order to help address Luton's housing need;**
- There is no commentary or proposal on the need or scope for a proposed west of Luton urban extension.*
- VI. welcomes the call for a partnership/collaborative approach to delivering the North Luton urban extension but seeks clarification and assurances on clearly assessing and mitigating any impact on Luton local roads accessing the site (e.g. Sundon Park Road; Northwell Drive and the A6) which should include completion of the Luton M1-A6 Northern Bypass before significant early phases of development take place, the threshold of which should be set at a level of mutual agreement;**
- In the current draft the reference to Luton being party to agreeing the North Luton Master plan or delivery plan has been removed. There is currently no amendment with regard to impact on local roads, phasing or thresholds.*
- VII. similarly in relation to the North Houghton Regis urban extension, seeks clarification, assessment and mitigation of impacts of early development phases on local roads prior to the completion of the A5-M1 link (e.g. there should be no vehicular access from any of the new development onto Kestrel Way or the disused Pastures Way – Parkside Drive);**
- There is no amendment with regard to impact on local roads, phasing or thresholds or the specific issue relating to avoiding access via Kestrel Way etc.*
- VIII. urges that the quantum and type of retail provision in the urban extensions should be consistent with the growth being brought forward and not be of a scale which undermines town centre vitality and viability of neighbouring centres or the retail hierarchy;**
- The plan makes no clarification or alteration other than to delete reference to a "supermarket" and replace with "food store" in paragraph 13.13*
- IX. that a fully collaborative and reciprocal approach is taken to sharing infrastructure and funding in relation to communities benefiting from facilities and infrastructure which is provided within each local authority area;**
- There is currently no further clarification or amendment to address this.*
- X. seeks clarification on the justification for the amount of employment land to be provided in close proximity to Luton and seeks clarification on whether development is to be proposed to the south of M1 Junction 10a, and if so urges that this development is of a scale, type and mix of land uses to mitigate impacts on the J10a design, help address the needs of housing within Luton, and be complimentary with proposed employment growth within Luton.**

- *The plan makes no strategic allocation or employment land budget allocation to accommodate such a facility. The employment land budget is increased to accommodate a strategic sites at Stratton farm Biggleswade increasing B land allocated from 117 ha to 139 ha*

Luton Borough Council's Detailed Comments – summarised *[officer comments on response in italics]*

Issue 1: Housing

- **Amendment to para 5.2 to include the 'duty to cooperate'** *[this has not been changed in contrast to the employment section which does include the duty to cooperate in paragraph 6.4 [now 6.15 - however, reference is made in Housing chapter para 10.2]*
- **A reference to meeting needs of adjoining areas could helpfully be included in paragraph 10.9 (Housing Mix).** *[no reference made. However, reference is added to the 'duty to cooperate' with neighbouring authorities in addressing needs in para 10.2]*
- **Site specific policies for the urban extensions fail to link review of green belt a exceptional circumstances to meet Luton's needs in particular.** *[no change] Matter of housing tenure and size and mix to the Master Plan/Framework Plan to determine [this still applies although clarification has been made to meeting a range of housing types and sizes]*
- **The North Houghton Regis Framework plan no reference to matching density, size, mix and tenure to also provide for Luton needs.** *[no change]*
- **consideration be given to looking at all possibilities for extra growth near to Luton, including to the west, in order to help address Luton's housing need.** *[no change]*

Issue 2: Neighbourhood Plans

- **Neighbourhood Planning to facilitating delivery of the strategy and wider needs of the conurbation** *[The plan does say Neighbourhood Plans should deliver the strategic objectives of the Development Strategy but does not make any specific reference to ensuring Neighbourhood plans deliver the wider needs of the conurbation]*

Issue 3: Infrastructure

- **Leisure requirements, as reciprocal e.g. for education, recreation, health and other needs where facilities existing and new can be shared and funded via a mechanism such as the Community Infrastructure Levy.** *[No change]*
- **Phasing of strategic transport infrastructure especially in the North Luton urban extension - the principal access will be via local roads in Luton (Para 13.41) including Sundon Park, Northwell and the A6. - no significant development should take place until the M1-A6 Luton Northern Bypass is put in place, the threshold of which should be set at a level of mutual agreement.** *[There is no amendment or reference]*
- **North Luton urban extension requires a Master plan and delivery plan and helpfully, the new strategy anticipates a partnership between the two councils, the development industry, services and utilities to prepare these strategies.** *[There is no longer a reference to Luton Borough council being party to agreeing the Master plan or delivery plan]*
- **clarification and assurances on the assessment of impact and mitigation measures - to ensure that the M1-A6 Luton Northern Bypass is in place before significant development takes place, the threshold of which should be set at a level of mutual agreement. Developer**

Transport Impact Assessments and statements (proposed Policy 26) must address off site/cross boundary implications of development arising within urban extensions. *[There is no longer a reference to Luton Borough council being party to agreeing the Master plan or a delivery plan]*

- **Master planning North of Luton will deliver adequate strategic landscaping - should include a 250m wide 'green lung' along the urban edge to protect the amenity of residents living on the urban boundary.** *[There is no specific reference to a 250m green/landscaping strip, although the plan states that the former green belt boundary (removed to accommodate the urban extensions) will be used for green space on the boundary with the conurbation]*

Issue 4: Retail

- **para 13.13 and policy 58 (North Houghton Regis urban extension), concern that the scale of retail proposed do not undermine town centre regeneration or the retail hierarchy of Luton, Dunstable and Houghton Regis.** *[The plan makes no clarification or alteration other than to delete reference to a "supermarket" and replace with "food store" in paragraph 13.13]*

Issue 5: Employment requirements and land to the south of M1 Junction 10a

- **Too much provision of employment on the edge of Luton, will undermine the urban regeneration of key employment areas within Luton** *[The plan maintains provision of more jobs (27,000 jobs) and B use land above that implied by their jobs forecast (20,000 jobs), on the basis of past economic performance and economic aspirations, sustainable balance and the accommodation of some of Luton's job growth - including airport expansion related growth]*
- **22 ha have been added at Stratton Farm Biggleswade increasing the B land allocated from 117 ha to 139 ha**
- **North Houghton Regis Site 1 Employment provision [para 13.12] suggests a revision down from 32 ha to 30 ha – although this appears to be a typo as policy 60 retains 32 ha, as does the overall land budget]**
- **a significant amount of development immediately to the south of Junction 10a within Central Bedfordshire. Luton has considerable concerns about such a proposal if it is intended to be solely for employment uses** *[The plan makes no strategic allocation or employment land budget allocation to accommodate such a facility].*