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<b>AUTHOR</b>	<b>Joint Report of Director of Environment and Regeneration, Luton Borough Council and Strategic Director (Environment), Bedfordshire County Council</b>
<b>SUBJECT</b>	<b>Regional Planning Guidance Note 14 - Options Consultation Paper</b>
<b>PURPOSE</b>	<b>Advise Members of the Recommended Response</b>
<b>RECOMMENDATION</b>	<b>That Members recommend their Executives to respond on the consultation document "East of England - your region - your choice - your future", to England Local Government Conference, by stating:-</b>  <b>1. Option 3 - Building on Regional Strengths is preferred;</b>  <b>2. The implementation of option 3 should involve extending the A120 westwards from the A10 to Stevenage, Luton and Aylesbury; and</b>  <b>3. Other transport schemes which would greatly benefit the remainder of Bedfordshire include:-</b> <ul style="list-style-type: none"><li><b>· the east-west rail link from Cambridge to Bedford and Milton Keynes; and</b></li><li><b>· the dualling of the A428 from Cambridge to Bedford; and</b></li></ul> <b>4. That this report is used to inform the responses of Bedfordshire County Council and Luton Borough Council.</b>

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**1. Introduction**

- 1.1** At its previous meeting on 23rd September 2002, the Committee considered a report upon the recently-published Regional Planning Guidance 14 - Options Consultation Paper. The

document identified four different approaches to growth in the Eastern Region over the period to 2021. These options are:-

1. Continuation of Existing Policy.
2. Outer Growth Nodes.
3. Building on Regional Strengths.
4. New City as Prime Location for Growth.

**1.2** The previous report outlined the implications of each of the various options for Bedfordshire and Luton. It also invited Members to consider which, if any, of the possible options they would prefer to support or which aspects of the various options they particularly support or oppose.

**1.3** The consultation document poses 60 specific questions. However, in so far as the Joint Strategic Planning Authorities are concerned, it is not appropriate to answer all of them, but merely to focus on what are considered to be the key issues. Of these, the main one is the Spatial Strategy, and the associated implications for the Green Belt and Sub-regions. The other key issues comprise Transportation, Population and Previously-developed Land.

**2. Spatial Strategy/Green Belt/Sub-Regions**

Question 19 - What spatial scenario offers the best basis for RPG14's spatial strategy? Which elements of the scenario, if any, Would you leave out and which elements of other scenarios, if any, would you add to it?

Question 16 - What approach should RPG adopt on Green Belts, in relation to other issues discussed in the spatial strategy?

Question 34 - Do you agree that defining sub-regions could assist RPG 14 in:

- ~ guiding housing development to the correct broad locations:
- ~ enabling housing supply to be monitored and managed in line with changing conditions?

If not, what alternative approach would you recommend and why?

**2.1 Assessment**

Growth in the county in recent years has been limited, not only because of the amount of land that has been allocated (particularly for residential development) but also because of the low take-up by the private sector. The county needs to achieve development in order to:-

- achieve the targets in the structure plans;
- meet local needs in terms of housing (and associated retail/leisure/community facilities); and
- facilitate economic growth to complement other growth and enable wealth-creation.

- 2.2** But any such growth has to be undertaken in a "sustainable" manner and it will be clear from recent experiences locally that the scope for development has to be attractive to the private sector, or it will not materialise. Given this it appears that a shift in emphasis is required with development being directed to the south of the county (i.e. around Luton/Dunstable) rather than towards Bedford and its environs. This approach is currently being pursued in the emerging structure plan.
- 2.3** The emerging structure plan is pursuing this rigorously but it has to do so in accordance with government guidance which effectively limits such growth to an urban extension in the Green Belt on the north side of Luton, within the alignment of the Luton/Dunstable northern bypass.
- 2.4** This consultation document enables the Joint Strategic Planning Authorities to promote a more comprehensive, larger scale shift in policy, and associated development, if that is considered to be desirable and sustainable.
- 2.5** If the policy approach currently being pursued in the emerging Structure Plan (which will cover the period to 2016) is considered appropriate through the longer term (to 2021) then the implications for any preferred options are clear. They are as follows:-  
Option 3 - Building on Regional Strengths is preferred as it facilitates substantial growth in and around the southern part of the county and it reduces the amount of development sought further north, around Bedford.
- Options 1 and 2 are rejected because they do the opposite of Option 3.
- Option 4 - is rejected as the location of Bedfordshire and Luton on the periphery of the Region is such that a new city would be located further east and the county will experience little benefit as a consequence.
- 2.6** Option 3 is therefore preferred from a spatial development perspective, but there are aspects of option 3 which are not supported. For instance option 3 implies a focus for new economic development on Hertfordshire and Essex. This is not in the long term interests of the county as it will encourage further out-commuting.
- 2.7** **Implications**  
Development which may be considered to be sustainable is that which strikes the appropriate balance between social, economic and environmental considerations both now and in the future. The most pressing demand for development to meet local needs is in Luton which is the largest town in the area and built-up virtually to its boundary. The scope for the growth of Luton to accommodate necessary housing and employment opportunities, together with the associated retail, leisure and social facilities, is therefore extremely limited.
- 2.8** Whilst it may be desirable to direct development to

Luton, this will have environmental implications. Luton is adjacent to an Area of Outstanding Natural Beauty and has the airport on the edge of its area. The latter will have implications for where any peripheral development may be acceptable given noise and safety considerations. This applies particularly given the government's proposed increase in the capacity of London Luton Airport (from 10m to 30m passengers per year by 2011) in the context of the SERAS consultation document. The actual number of passengers, and therefore flights, will, however, be dependent upon the number of runways built elsewhere in the south east.

**2.9** The scope for an expansion of the Luton/Dunstable conurbation is therefore somewhat constrained when environmental considerations are taken into account but this does not apply to the Green Belt which is a planning policy rather than an environmental constraint. The consultation document gives an opportunity to reassess the role of green belts in the region and amend their boundaries if needs be.

**2.10** The current pressure on Hertfordshire to accommodate anticipated development requirements is intense. If realised, it may well necessitate substantial development in the Green Belt which could have a dramatic and adverse impact upon the character of the county. Whilst development around the Luton/Dunstable conurbation would also be in the Green Belt, it may well have a more tolerable and sustainable impact upon the function of the Green Belt, the openness of the countryside and the character of the landscape. Although such development may well involve incursions into the Green Belt in North Herts., that would be subject to other considerations (see para. 2.8 above) and be more readily justifiable in terms of a sustainable pattern of development.

**2.11** The consultation document also facilitates Bedfordshire and Luton being considered mainly in the context of the East of England rather than in isolation. Hence, the county boundary with Hertfordshire should not be seen as the constraint on development that it clearly must be in the context of the Structure Plan. If there is to be any significant expansion of the Luton/Dunstable conurbation then it should be planned and implemented on the basis of what is considered to be sustainable development rather than limited, and therefore determined, by local government boundaries.

### **3. Transportation**

Question 41 - Should key regional transport nodes (e.g. Bedford, Cambridge, Luton, Stansted, Stevenage, Thames Gateway and Watford) be the focus for improved network and interchange possibilities?

Question 47 - Do you consider that the identification of public transport nodes as locations for regional or sub-regional Development is a helpful approach?

Question 48 - What rail and road freight improvements do you consider are required? Where should strategic freight interchange be encouraged?

**3.1** If development was to be directed to the Luton/Dunstable conurbation that should not mean that the northern part of the county is particularly disadvantaged. It will have neither the advantages nor the disadvantages associated with major development but

could and should benefit in other ways. The two most significant opportunities are in improvements to the transport network and the enhancement of both existing settlements and the function and character of the countryside.

**3.2** An extension to the A120 from the A10 to Stevenage, Luton and Aylesbury is an integral part of Option 3 and would be welcomed both as an important new route and a means of providing localised relief to traffic congestion, particularly on the M25.

**3.3** Further transport schemes which would also be of particular benefit to Bedfordshire, even if much more development was directed to the Luton/Dunstable conurbation include:-

- east-west rail link from Cambridge to Bedford and Milton Keynes; and
- dualling of A428 from Cambridge to Bedford.

**3.4** This would effectively enable Luton and Bedford to have enhanced roles as both regional and public transport nodes which is to be welcomed.

#### **4. Population**

Question 9 - How should RPG14 respond to:

The overall likely long-term increase in regional population?

The apparent increase in the rate of population movement into the East of England from London?

The apparent change in the rate of household formation?

**4.1** The consultation sets out four illustrative growth scenarios with regional annual dwelling provision rates ranging from 19,300 to 27,300 per year. This compares with the current Regional Planning Guidance rate of 20,850 per year.

**4.2** The emerging draft London Plan features an imbalance as it incorporates provision for less new housing than new jobs. This will result in more in-commuting. The emerging RPG should both reflect this and include a contingency in case the capital's ambitious housing targets are not realised.

**4.3** In view of the uncertainty over the robustness of assumptions about future household size, the best approach should be to use a cautious figure for future dwelling provision and then adjust in the light of monitoring household formation, in-migration and dwelling completion rates.

#### **5. Previously-Developed Land**

Question 35 - Do you agree with the suggestions for increasing the proportion of development coming forward on previously developed land? If not, what targets do you suggest, and how could they be achieved?

**5.1** The consultation suggests a target of 55% for all types

of development on previously developed land in Bedfordshire and 70% in Luton. The Bedfordshire figure looks to be challenging, given that only 40% of new housing was from previously developed land between 1991 and 2000. The Luton figure is virtually 100% given the built-up nature of the Borough.