



Local Plan
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Shefford
SG17 5TQ

21st February 2018

Dear Sir/Madam

Re: Barton-le-Clay Parish Council's Representation on the Pre-Submission Local Plan 2015 to 2035, January 2018

The Parish Council considered the contents of the pre-submission draft of the Central Bedfordshire Local Plan and supporting Technical Documents at meetings on 12 February and 19 February 2018.

The Council wish to **object** to two policies of the Local Plan, these are Policies HA1 (Luton Road and Higham Road) and SA1 (North of Luton)

Policy HA1 – Small and Medium Allocations

This Council would like to make the point that the Luton Road site is not currently deliverable.

This policy identifies sites for housing development and includes two sites in the Parish at Luton Road and Land East of Barton-le-Clay. The approach identified at paragraph 5.4 of the local plan is to deliver housing need identified in the Luton Housing Market Area and some unmet need close to where it arises where there is capacity to do so sustainably.

The Parish Council consider that Policy HA1 should be replaced by a policy that:

- identifies and delivers the need at village level with the aim of maintaining the vitality of the village;
- facilitates a review of the Council's Initial Settlement Capacity Study;
- supports the completion of the Initial Settlement Capacity Study;
- supports true integration of Neighbourhood Plans within the Local Plan Review process, including reviewing the Green Belt boundaries,
- supports the ethos of community planning where Neighbourhood Plans are not being adopted,
- supporting free to access leisure facilities in the village and;
- minimising environmental impact in expanding the village.

The reasons for the Parish Council's objection are set out below.

Green Belt

Paragraph 2.3.2 of the LP states *"the Council will seek opportunities to maximise the use of suitable available, previously developed or 'brownfield' land before looking at sites within the Green Belt or green field sites elsewhere in Central Bedfordshire to accommodate future growth requirements."* This indicates that you have not looked at sites outside the Green Belt before considering those within it. The Parish Council considers that Green Belt release should only be explored when all other avenues have been exhausted, which includes first looking at brownfield land and then greenfield land beyond the Green Belt. Such a sequential approach is compliant with the National Planning Policy Framework.

The Parish Council is of the view that there has been inadequate assessment of available Brownfield land (published in the Central Bedfordshire Councils brownfield register) for housing, given the sequential preference to consider such land before looking at greenfield site, particularly those within the Green Belt where the aim is to keep land open and therefore free from development.

In addition, the Local Plan does not currently identify those employment sites that will be brought forward for non-employment uses by Policy EMP2.

Regarding the Green Belt, National Planning Policy provides for changes to be made to the Green Belt through the Local Plan. To make a change to the Green Belt boundary in the Local Plan there have to be 'exceptional circumstances' (NPPF para 83). Have 'exceptional circumstances' been sufficiently proven to permit all the housing allocations in the Green Belt?

The assessment of land around Barton-le-Clay was undertaken in the Central Bedfordshire and Luton Green Belt Study Appendix 1 – July 2017, indicates that there would be conflict with the purposes of the Green Belt. The technical documents informing the Local Plan do not identify an exceptional need to release land from the Green Belt for housing.

Therefore, the Parish Council considers that the 'exceptional circumstances' necessary to justify the release Green Belt land for housing have not been proven.

Capacity Issues and Transport

The Council's initial Settlement Capacity Study identified substantial capacity issues in local schools. These need to be fully addressed now.

The proposed housing allocations would result in a significant, rapid and unsustainable increase in the population of Barton-le-Clay. This additional housing would have a substantial impact upon services and facilities, such as: schools, medical facilities, community facilities and utilities. This impact upon Barton has not been assessed in any detail. The Infrastructure Delivery Plan of January 2018 identifies some additional provision but is lacking in detail.

The Parish Council accepts that some development is appropriate but wish to ensure that the community and settlement identity of Barton-le-Clay is maintained and that the settlement is not over-developed.

There are limited options for sustainable transport in the Parish. The local cycle network is inadequate. The link to the nearest railway station at Harlington is via an unlit country road with no footpath or cycleway. The public transport service is limited to an hourly service to Luton during weekdays, with no service on Sundays. Consequently, most occupiers of the proposed housing would be likely to travel by private car. There does not appear to have been adequate assessment of the impact of the proposed housing development, and other developments in the area, on the local highway network. Table 3.2 of the Luton HMA Options Study identifies the limited access to public transport and employment. The proposed housing within the Parish will generate a significant increase in journeys by car, compared to other locations with better public transport provision.

The Transport Modelling Technical Notes (January 2018) indicate that CBC is in the process of updating the transport evidence base required to support the production of the Local Plan. The modelling identifies a number of 'hot spots' on the A6, where there are issues of capacity and resulting congestion. The A6/Barton Road/ Higham Road junction is identified as a 'hot spot' and the Stage 2A Transport Modelling Technical Note confirms that further assessment of non-strategic schemes will be required at later stages. The Parish Council is concerned about the cumulative impact from all the housing allocations near the A6, that do not appear to have been addressed in the modelling.

The overall effect of increased traffic on air quality and pollution has not been adequately addressed, and this is of great concern to the Parish Council.

Policy SA1: North of Luton

This policy allocates land to the north of Luton and within the Green Belt for up to 4000 dwellings and a minimum of 20 hectares of employment development. The Parish Council raise the following concerns.

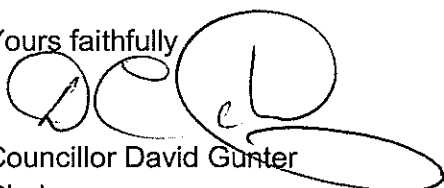
- The allocation is based upon the unsupported premise that this is the only way to meet Luton's unmet need.
- The policy acknowledges the need to improve transport infrastructure. This will have significant impacts and there are grave concerns about the resulting traffic volumes, noise and pollution/air quality issues, which at this point have not been adequately assessed.
- Given the limited access to public transport the allocation will generate significant additional traffic movements by car. The traffic travelling east to the A1 and north on the A6 will have a significant impact on the highway network in the Parish, including substandard B roads. These impacts are not adequately addressed in the Local Plan and supporting technical studies. Consequently, it is considered that detailed traffic modelling and additional cooperation with Luton Borough Council regarding highway infrastructure must be addressed before Policy SA1 is approved.

The Parish Council have concerns that the Community Infrastructure Levy (CIL) has not been addressed in the Local Plan.

The Parish Council request that these objections are considered before moving any further forward with the draft pre-submission Local Plan.

The Parish Council confirm that they wish to make representations at the Examination In Public and provide further evidence in support of the concerns that have been raised in this letter.

Yours faithfully



Councillor David Gunter

Chairman

Barton-le-Clay Parish Council