

# Central Beds Local Plan: Response to additional documents

## by Harlington Parish Council

following Full PC meeting 6<sup>th</sup> July 2020

Response to Document 107: Sundon RFI

### Summary

The Council is making strong objection to the loss of green belt from the development of the Rail Freight Interchange at Sundon (document 107) and Luton North (doc. 113) . The loss of green belt at the RFI and the M1/A6 link road, and the potential for further loss of green belt if the RFI is expanded in future has not been adequately factored into the assessment. It is increasingly likely that the Local Plan's estimated need for new housing is excessive so the the loss of green belt and impact on the AONB from these schemes are unjustified. If allowed the RFI and link road would risk further loss of green belt with future expansion, especially with the potential for freight traffic drawn from the east and north (A1 / A421) via the A6, a scenario not assessed or tested.

The Parish Council is objecting to unjustified and unacceptable growth in the vicinity of Harlington, making strong objections to the proposals in documents 113 and 115 for additional growth at the village because of major safety concerns, the impact on the green belt and the lack of facilities in the village. The allocations off Sundon Road Toddington Road and the permitted scheme at Station Road amount to 635 additional homes in the village – a 65 % increase, in a village with limited facilities.

The documents provided by CBC continue the mistaken classification of Harlington as a Large Village/Minor Service Centre (MSC) to justify new development, which it is not lacking a high street, bakers, variety of venues – cafe's, take-aways and restaurant and a range of retail options plus a bank (in Barton) and libraries. Harlington has none of these services and facilities let alone the full-time large GP surgeries and regular bus services - the number of homes proposed in the Local Plan would mean Housing growth and the RFI would have a serious impact on the character of the village and its surroundings..

Other responses by the Parish Council raise major concerns over the Sustainability Assessment and the Housing Technical Report, and concludes by suggesting Modifications which the Inspectors are requested to consider in order to deliver an adopted local plan for the area paying due regard to minimising the loss of green belt and AONB, and using the Early Review proposed by CBC to re-assess housing needs to a more realistic level in light of the forecast economic downturn, with a fresh 'call-for-sites'.

The format for uploading consultation responses may involve duplication, unfortunately this is unavoidable in order to get over the objections in a comprehensive manner.

**Consultation Response to Document 107:RFI Sundon**

The work by Lichfields to appraise other RFI sites covers a wide geographic radius. However, it fails to add projected traffic generation and lorry movements in with those anticipated from the proposed development north of Luton and the M1 / A6 link road – all of which would flow into the M1.

Further, as evidenced at the Daventry Rail Freight Terminal, increases in demand at Sundon will require the release of more land, the loss of more green belt. The connections created by the M1/A6 link road would enable freight from the A1 to use the A421 to reach the Sundon RFI. The potential impact of this future growth has not been tested or assessed.

The impact of the Sundon RFI – visual, noise, light, pollution to waterways and groundwater in the chalk aquifer, should all be taken into consideration, but most notably in relation to the loss of green belt land and impact on the Chilterns AONB. It is notable in the SA document 115 there is no weighting applied to the scoring – for instance the score for sustainable transport will vary over time with shifting modes and technologies, the loss of green belt is absolute and irretrievable, and should therefore be weighted to reflect its significance.

### In Summary

The revised proposals do nothing to address the previous objections raised by the Parish Council. The proposed RFI will result in permanent damage to the green belt, unjustified in view of other RFI proposals with direct connection via the M1 and warehousing developments at almost every junction.

### Recommended Modifications: Document 117

The Parish Council is not simply opposing any new developments in Harlington. Over recent years over 150 new homes have been approved in the village (over 10% increase).

The Parish Council requests the Inspector to apply modifications to the Local Plan before it is approved as the basis for future development of the area, the modifications to include the following:

- removing the RFI and warehousing at Sundon Quarry from the Local Plan as the justification for siting this in the Green Belt and the prospect of future expansion have not been assessed independently and so concerns raised have not been addressed. If the Inspectors are minded to agree the RFI at Sundon modifications should be added addressing road traffic movement, hours of operation, and minimising light and noise pollution, visual intrusion for nearby residents, and prevent pollution of the groundwater and this important aquifer.
- Use the Local Plan's Early Review mechanism to reassess housing needs, incorporate material changes, enable effective inter-authority agreement on meeting housing and other development needs, identifying a realistic target for new homes in the period beyond 2035 for the whole of Central Beds with a new Call For Sites and wide-ranging traffic impact study, to support housing and development strategies which conforms to the National Planning Policy Framework for development which minimises loss of green belt, impact on the AONB, environmental pollution and other impacts.

