

# 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 114: Highways

#### Summary

The Parish Council wishes to make strong objections to the proposals in the additional documents for growth at Harlington 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 justification for developing Harlington is the presence of a railway station however the scale of growth has no regard to data on where people work.

Document 114 focuses on demonstrating that junctions 11a and 13 can cope with the increased traffic load. Document 114 refers to the proposals in the Local Plan, the Local Transport Plan, plus Walking and Cycling Strategies, without any benchmarks or evidence for modal shifts nor data on how transport to work, shopping, leisure or other destinations had altered since the last census. By concentrating on the two motorway junctions there is no recognition of the impact on traffic flows on the M1 itself nor on the highways network across central beds which will be affected.

The documents continue the mistaken classification of Harlington as a Large Village/Minor Service Centre (MSC) to justify new development. Villages like Toddington and Barton are MSCs with 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 both have 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 Harlington would grow by two-thirds its current size. The lack of facilities within the village mean people will have to travel to shop, visit the doctor, etc. These needs are not met by the railway and without adequate bus services, these journeys will be by car.

The response is based on 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.

Harlington retains much from its history in terms of its buildings and layout, a small green belt village. Dense urban developments, such as proposed at HAS20 at 40 dwellings per hectare will radically alter the character of the village, particularly at HAS20 as one of the main entry points to the village, urbanising this 'gateway' which has a very rural feel adjoining the Conservation Area with

the Railway cottages to the Right and the Harlington Manor house to the left. The barn style homes to the left reflect that rural feel and were designed to avoid a 'clash' in character with the village.

### Material Considerations

The M1 / A6 link road is cited as a material consideration to be taken into account. Another new factor is the MK eastward expansion with funded infrastructure investment. The area around Cranfield (outside the green belt and the AONB) should be reassessed as a more sustainable option for development, within a more up-to-date housing needs assessment total. Had this option been included in the Sustainability Assessment options it would have scored highly under numerous headings and removed pressure for loss of green belt and AONB through un-justified development.

There is a major concern within the area that the highways issues examine each proposal in isolation and fail to address the cumulative impact. M1 junction 11A is expected to attract traffic from:

- 7,000 homes were included in the Local Plan on Green Belt in Houghton Regis -HRN1 and 2. These already have planning permission and some 2,000 have been built out. The addition of further sites could bring approximately 2,000 more homes to the area,
- There are more sites to be developed in the Local Plan at Toddington and Westoning – plus 100s more homes are planned for Flitwick.
- There are proposals at Flitwick for a new Lidl store and crematorium,
- 3,600 new homes at Luton North
- Lorry traffic to and from the RFI and warehousing at Sundon Quarry
- Lorry traffic serving the huge Lidl warehouse at Houghton Regis North
- the prospect of traffic from the A1 north of the area coming via the A421 and A6.

At peak times, traffic south-bound already tails back from Harlington towards Westoning, through traffic driving towards the M1. The M1 is running at 120% capacity at the moment and is envisaged to be going to reach 150%. Any interruption of the flow on the motorway will inevitably add to the existing congestion, delays, pollution, tail-backs on feeder roads, and drivers rat-running through the area to try and avoid the motorway disruption.

### In Summary

The revised proposals do nothing to address the objections raised by the Parish Council. The allocations off Sundon Road and Station Road amount to 600 additional homes in the village. yond.

None of the sites in question were considered not to be fulfilling their role as Green Belt in the CBC Green Belt Review, however supporting a RES in the village reflects the awareness of housing needs.

The Local Plan has included a proposed Early Review to determine future growth requirements and suitable sites – the sites shown in Appendix 7 could amount to an additional 20,000 homes. Green Belt land once lost to development will never be regained. The Early Review will reflect the economic climate with the impact of Covid 19 and Brexit, the high-level strategic aim of the million homes in the OX Cam Arc and proposals for development in the north of England. A RES would be a measured response currently and sufficient of itself to fill a real need for the village in these times avoiding the worst landscape and green belt consequences.

### 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:

- Deleting the proposed development at HAS20 and HAS21 and including a smaller allocation – a rural exception site at Harlington east of the railway,
- 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.
- A maximum of 3,100 homes in the allocation north of Luton with enhanced landscaping measures to minimise the visual impacts of the development and a s.106 element that addresses the impact of the development on services and facilities in the villages,
- 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.