

Central Beds Local Plan: Response to additional documents

by Harlington Parish Council

following Full PC meeting 6th July 2020

Response to Document 115 (&113): Housing

Summary

The Parish Council wishes to make strong objections to the proposals in documents 115 and 113 concerning the additional growth at Harlington and the failure to re-assess reasonable alternatives.

The Council is making strong objection to the loss of green belt from the developments at Harlington and of the Rail Freight Interchange at Sundon (document 107) and Luton North (doc. 113) . It is increasingly likely that the Local Plan's estimated need for new housing is excessive, and the loss of green belt and impact on the AONB from these schemes and the new M1 / A6 link unjustified.

Document 115 should have tested reasonable alternatives in light of material changes and minimised loss of green belt rather than re-asserting the original chosen options.

The response set out below raises 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 115:

In relation to Harlington the Inspectors stated in their letter to CBC

32 access to the site, and therefore the school, would have to be taken from Toddington Road. This would require children, and parents with pushchairs, having to use the narrow footpath over the railway bridge and cross the road on a sharp bend at the junction of Toddington Road and the entrance to the station car park. ... this would significantly increase the risk of accidents occurring, especially during the morning and afternoon peaks It is difficult to see how appropriate highway improvements could be made to maintain pedestrian safety.

33..... the Council's suggested changes would not be justified due to the harm that would be caused to the landscape character of the area and/or highway safety.

The additional documents do not address the Inspectors' concerns (para 33 above) over harm that would be caused to the landscape character, except to asset in para 3.11.10 of document 113 that:

With no significant reduction in the number of new homes, there is no need to reconsider the benefits of the allocation against the harm to the Green Belt. The Council continues to ... identify Harlington as a Minor Service Centre, which has a medium-high growth potential.

These would suggest that there were fundamental issues to address and the search for reasonable alternatives should have embraced other sites in the Sustainability Appraisal.

Within the additional documents CBC asserts that the new M1/A6 link road is a material change to be taken into account; to this could be added the eastward expansion of Milton Keynes with new infrastructure. Again with new material considerations the sustainability appraisal should have been more wide-ranging.

The documents ignore the adoption and funding of proposals to bridge the M1 at Milton Keynes with a substantial urban expansion programme for MK east of the M1. This development and new transport infrastructure mean a number of sites in the adjoining part of Central Beds should have been appraised to satisfy the Inspectors' concerns especially as the proposals in the Local Plan involve loss of so much green belt.

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.

Housing Numbers

Document 113 maintains the original target for new homes despite this being now more than 2 years out of date and surpassed by a number of factors including the major economic downturns predicted as a result of Brexit and Covid 19. The importance of preserving the green belt and protecting the AONB means that a proper re-assessment is of vital importance.

More prosaically the numbers within the housing need calculations take no account within the commitment calculations of the 1,500 new homes approved at Arlesey and the 7,000 new homes under construction at Houghton Regis – these are both still assessed as 'options' within document 115 – sustainability appraisal.

The proposed homes in the Green Belt villages across Central Beds can be interpreted simply as bridging a 'build out gap' in the event that larger strategic allocations such as North of Luton Urban Extension fail to be commenced within the first 5 years. Development in the green belt requires exceptional circumstances, once lost the green belt land is lost forever. Developing sites such as those on the edge of Harlington simply to meet mathematical uncertainty does not represent adequate justification. The lack of facilities in the village is highlighted by the need to build a new school – squeezing HAS20 to an inappropriate density and out of character building forms.

The Parish Council has serious concerns that the new sustainability appraisal and Housing Technical Report (documents 115 and 113) fail to take into account the change in context since the Plan was submitted in 2018, maintaining a housing target in excess of what's required, with weaknesses in the assessment approach – notably a very limited range of 'other sites' compared to the near 200 sites originally assessed. Neither document addresses 'reasonable alternatives' to the small / medium sites.

The Parish Council would urge the Inspectors to make modifications to achieve an adopted local plan without slavishly following the out-of-date numbers but instead emphasising the Early Review proposed within the Local Plan – to re-assess and recalculate more realistic housing need, a re-evaluation of housing commitments, and economic pressures. With a new call-for-sites (update the 2016 exercise) it would enable the Council to re-appraise needs against loss of green belt and impact on the Chilterns AONB.

Luton North

The parish Council is raising serious concerns and objections to the impact of the proposals north of Luton due to loss of green belt and impact on the area of outstanding natural beauty, and encroachment of the major urban area northwards including the RFI at Sundon.

The sole reason for rejecting the lower figure for Luton North agreed at the Examination is to achieve greater contribution to the costs of the controversial M1/A6 link road. The generation of financial contribution to road construction is not one of the reasons for justifying loss of green belt and the addition of the Eastern Bowl should be resisted in the Inspectors' Modifications.

Financial contributions to infrastructure is used by CBC to justify development (a circular argument) but this isn't part of the assessment process within document 115.

The proposals in documents 113 and 115 to develop green belt villages in order to meet Luton's unmet needs has no connection, justification or adequate reasoning to meet the 'exceptional circumstances' in the NPPF. The arguments for disproportionate growth in villages like Harlington are further undermined when the Local Plan has already considered the option of developing the area between Caddington and Luton for future growth. Developments to the north and west of Luton scaled back to meet the minimum assessed housing need with sustainable transport connections into the town's facilities represent a more plausible development strategy than settlements scattered among the green belt villages with 'hop-on hop-off' commuter traffic on the M1.

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. The Parish Council is raising serious concerns and objections to the additional documents, both proposed sites on the edge of Harlington, and the efforts to make HAS20 acceptable due to

- failure to address the loss of green belt and the resulting 'sprawl' risking the merging of Harlington and Toddington via the M1 junction,
- major safety concerns arising from the new HAS20 masterplan and access proposals,
- the inclusion of land at this late stage outside previous site allocations,
- the inadequate facilities and services in the village to support those living in the new homes, risking a divided village and creating a commuter dormitory,
- the extent and costs of works to make the new site acceptable – new school, extensive road and safety improvements makes the prospect of further development highly likely to pay for these works,
- the major errors in the new documents produced by CBC regarding the extent of the site and ambiguity in the suggested safety improvements.

The Parish Council has actively engaged with the village residents throughout the Local Plan process. The representations made reflect local views, put forward using issues and reasons supported with 'planning' arguments.

The Parish Council has also supported appropriate and proportionate development – vis the 45 new flats at Station Yard. The proposed deletion of HAS20 and HAS21 and the inclusion of a Rural Exclusion Site is a reflection of the strongly held local views that the village has very limited facilities, but with a modest RES development, better linked with the fabric of the village without incurring a major loss of green belt west of the railway and sprawling towards the M1 and Toddington beyond.

None of the sites proposed at Harlington 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

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.