

Central Beds Local Plan: Response to additional documents

by Harlington Parish Council

following Full PC meeting 6th July 2020

Response to Document 113 (& 115): Housing

Summary

The Parish Council wishes to make strong objections to the proposals in documents 113 and 115 for additional 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 Council is also 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) . 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. If allowed the RFI would risk further loss of green belt with future expansion, especially with freight traffic drawn from the east and north (A1 / A421) via the A6, a scenario not assessed or tested.

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, and introduce un-safe arrangements for school children.

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 113: HAS20

HAS20: West of Harlington: Documents 113 and 113 D, E and F

The Parish Council is very concerned that despite the Inspectors' rejection of this site, HAS20 has been re-jigged and re-introduced. Development on the western side of the railway is fundamentally flawed as set out in previous objections:

- un-justified and irretrievable loss of green belt and impact on the countryside,
- a location detached from the rest of the village,

- a development attached to a community with inadequate facilities,
- severe road safety concerns, and
- the threat of sprawl towards the M1 and Toddington.

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 re-jigged scheme in document 113 introduces a second unsafe narrow footpath under the Westoning Road bridge.

Harm to the Landscape Character / Loss of Green Belt

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.

Earlier objections from the Parish Council pointed to errors and omissions in the technical appraisal which identified Harlington as a Minor Service Centre, these have not been addressed or corrected, simply repeated regardless.

Highway and Pedestrian Safety

The proposals contained in documents 113 and 113 D, E and F make a poor and un-safe proposal even worse by attempting to include land that has been absent hitherto from any site or assessment, introducing an urban density completely at odds with the location, and channelling pedestrians and cyclists and in particular school-children onto a narrow, unlit road tunnel under the railway. The proposal glibly proposes road access from Toddington Road, pedestrians and cyclists using the new access on Westoning Road. The sole reason for additional development in Harlington is the presence of a railway station: pedestrians will still use Toddington Road as the shortest route to and from the station.

The re-design of HAS20 has been set out in paras. 3.11.1 to 3.11.23 in document 113, the Housing Technical Paper. The 'Masterplan' for HAS20 is shown in 113F, access strategy in 113E and D.

Section 3.11 paras 1-23 contain the following:

- the Council's Education Team that 2.1ha of land within the site would be needed to accommodate a new 1Form Entry Primary School to meet the needs of the site by replacing the existing Lower School in Harlington (3.11.4),
- The site capacity has been retained by removing the provision of additional sports pitches that were previously proposed on-site – the developer will make a financial contribution for pitch improvements off-site (location not specified). (3.11.7)

- The housing density has been increased up to 40 dwellings per hectare to achieve 435 new homes, the higher density justified by proximity to Harlington Station (3.11.8) regardless of the appearance or impact on the adjoining green belt.
- 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. (3.11.10) The Council continues to ... identify Harlington as a Minor Service Centre, which has a medium-high growth potential.

The HAS20 site has been redesigned to include a school following the discussions during the Examination. The revised proposal has highway upgrades along Toddington Rd, Westoning Rd, and alterations to the bridge over the railway (set out separately in 113E and D).

Details of the proposed site access arrangements are however, set out in Document 113:

- **Access:** A technical report together with detailed technical drawings have been prepared by the site promoter and submitted to the Council.(3.11.12)

(This technical report has is not available for consultation. The scope of the report is therefore not available, neither is it clear if it takes into account the safety report presented to CBC by its officers in 2017. This included a traffic speed / count which showed over 50% of traffic exceeding the speed limit.)

Nonetheless, Document 113 asserts that this work demonstrates that it is possible to

- improve key routes to provide suitable access for pedestrians,
- the main vehicular access is proposed to be taken from Toddington Road, with
- a separate pedestrian and cycle access onto Westoning Road,
- interventions are proposed to the Station Road bridge over the railway line and to Toddington Road,
- including footway widening, pedestrian crossing improvements and carriageway re-alignment in order to provide new improved footways,
- proposals also include an extension to the 30mph speed limit on Toddington Road to the west of the site access. (3.11.13)

Design Manual for Roads / Manual for Streets – Dept of Transport

The Parish Council's concerns come to a sharp focus particularly at the railway crossing 'pinch-points'. This was a point of specific concern clearly stated in the Inspectors' written comments, the additional documents (113 and attachments) reinforce the proposals' inadequacies. The design manuals for highways set a 2m minimum width for footways, such as used by school children – wider near schools, advising that cyclists should normally use the carriageway, ideally on a segregated cycle lane. The proposals in the access strategy set out a 2m width for a combined pedestrian and cyclist route for Westoning Road and part of Toddington Road – clearly at odds with the Manual's standards. However, at the 'pinch points' this combined pedestrian and cycle path reduces to 1.5m over the Toddington Road bridge and 1.8m in the un-lit Westoning Road tunnel. Both would be below standards and immediately adjacent to carriageways carrying increased traffic on a narrowed width.

(see Manual for Streets: paras. 6.3.22 and 23 and Design Manual for Roads and Bridges: CD 239 and others for wider specifications and details.)

Further the proposals in the Local Plan additional documents propose school children using these routes in opposing directions at the beginning and end of the school day – the lower school on the HAS20 site and upper school in the village. Thus, the proposed path for Westoning Road becomes even more inadequate and the 1.8m under the railway truly alarming with children moving in opposite directions with easy potential for stepping off / being pushed off the pavement beside peak time traffic flows.

Toddington Road proposals (see 113D)

In detail, the proposals are to	COMMENTS
widen the footway to 3m from the site entrance eastwards,	
Approx. 50m short of the railway bridge, add a new uncontrolled road crossing	A pedestrian crossing west of the bridge would be out of sight of westbound traffic due to the sharp bend over the railway. Drivers' attention would firstly be on traffic emerging from the station entrance and / or buses stopping, before focusing on an uncontrolled crossing.
Construct a new footway on the south side of the road 2m width	details of how the new footway will incorporate the existing bus stops (both sides of the road) and existing small car park not provided
Introduce new bus stop facilities	
New crossing over station access for new footway – dropped kerbs and tactile crossing points	Position not clear – so unable to ascertain sight lines for pedestrians and motorists at this junction where the road turns sharply over the bridge
Footway over bridge increased 1.2 to 1.5m	Still considerably short of modern standards for a footway, let alone combined route for pedestrians and cyclists, And adjacent to carriageway – narrowed but carrying additional traffic
Traffic calming	Details / locations / specifications not provided
	Intersection of new footway and vehicular entrance to station – not provided
Speed restrictions	30mph location - not specified
	No additional street lighting proposed
No reference to the Station Yard development permitted with 45 flats currently being built to the other side of the Railway Station entrance which would exit onto Station Road/Toddington Road. There is no indication that safety issues have been considered with children crossing over that entrance in both directions and traffic from Station car park and the new site, nor the geometry of Toddington Road / Station Road, the narrow width of the carriageway and pavements and the dangerous crossroads with no visibility etc..	

Westoning Road proposals (see 113D)

In detail, the proposals are to	COMMENTS
Access from Westoning Road to new school	Width not specified Whether pedestrians / cyclists separated or combined

	No details of whether this would accommodate emergency or service vehicles.
Footway – southern side of Westoning Road increased to 2m width	Potential conflict with numerous residential drive cross-overs Street lighting very poor, winter afternoons would involve school children using this in near darkness
Continue improved footway under bridge eastwards	This would not connect beyond the bridge, the footway on eastern side of bridge is on opposite / northern side of road – no crossing proposed
Widen footway beneath bridge to 1.8m	Still considerably short of modern standards for a footway, let alone combined route for pedestrians and cyclists, And adjacent to carriageway – narrowed but carrying additional traffic
Carriageway priority signs proposed either side of bridge	Width of footway / reduction in carriageway width – not specified
No new street-lighting under bridge or along Westoning Road	
No traffic calming proposed along Westoning Road	
Speed restrictions – not proposed	
<p>Details are also provided in Document 113: improvements to Westoning Road itself are proposed including</p> <ul style="list-style-type: none"> • footway widening under the rail bridge and • a consistent 2m wide footway on the southern side of the road west of the rail bridge to the proposed pedestrian/cycle access into the site (it is estimated that at least 75% of pedestrians travelling from the village to the school are likely to use Westoning Road. (3.11.15) • The Westoning Road improvements will enable children to walk or cycle to Harlington Upper School, and villagers to access the remaining Green Belt land to the west where a connection providing enhanced accessibility to the existing wider footpath network is proposed. (3.11.16) <p>An independent Road Safety Audit (RSA) has also been commissioned by the promoters of the site – it found there were no significant safety issues from these proposals affecting either vehicular, cycle or pedestrian access into or out of the site (3.11.18)</p>	

The extract from the masterplan (document 113 F – see below) indicates the extent of the Westoning Road proposals.

The Parish Council is greatly concerned that the proposed safety measures have weaknesses, flaws, and proposals considerably below modern standards with consequent unacceptable risks for the proposed users – including school children. Plus there is potential ambiguity between the various sections and annexes within document 113, and that these safety proposals in no way provide justification or any satisfactory means to address the fundamental objections to HAS20 – loss of green belt, impact on landscape character, safety concerns and inappropriate development in relation to the layout of the village.

The modifications proposed in order to overcome the problems with HAS20 (see 113: para (3.11.23) comprise landscape buffering around the site, noise mitigation required for railway (acoustic

fencing?? Potential visual intrusion), a new lower/primary school, plus highway pedestrian improvements. However, the wording used in 3.11.23 'between the railway and the pedestrian/cycle entrance,' differs from 3.11.15 which proposes improvements under the railway bridge with a wider footway / narrower carriageway – even though this will not connect with the existing footway east of the railway bridge.



Relocating the School

The proposal to close the Lower School so that all infant / primary age children from the existing village and the new development would mean the majority of children travelling daily over the Toddingon Road Bridge or under the Westoning Road Bridge during the morning peak traffic flows and in the afternoons to reach the school. Both routes represent considerable safety concerns – one with a proposal for an uncontrolled crossing, the other with no crossing proposed at all. Toddingon Road is unlit and Westoning Road has lights approximately every 100m, below modern standards for a 'route to school' and none under the bridge itself.

The closure of Lower school would invite its redevelopment as a 'brownfield' site, increasing pressure on the village's already limited facilities and more young children travelling to the new school, crossing from one footpath to the other then under Westoning Road bridge.

The proposals also envisage the new accessibility and connectivity along Westoning Road carrying secondary school age children travelling eastwards (opposite to the flow of primary age children) plus villagers travelling westwards to access the remaining green belt land beyond. There is no explanation how cyclists, joggers, pedestrians, push-chairs, dog-walkers and school children are to use a 2m wide (max) combined-use, poorly-lit pavement and the narrow path under the bridge. Arguably the most dangerous 'pinch-points' are

- under the Westoning Road railway bridge where the pavement would run alongside a two-way carriageway albeit with uncontrolled traffic priorities and no crossing to connect with the existing footway,
- the Toddington Road pedestrian crossing / new footway – bus stop and car park / station entrance / sharply turning carriageway over the railway bridge.

The ambiguity between safety proposals set out in 3.11.23 and 3.11.15 are at best misleading. The overall package of measures are not convincing because of the pinch-points and the disconnect with existing footways.

Validity of safety audit – and scope

Given the weaknesses in the proposed safety interventions set out above for both Westoning Road and Toddington Road, and the ambiguity in the proposal whether the pinch point where Westoning Road passes beneath the railway is even included, the validity of the safety audit and its easy reassurances in favour of the scheme have to be called into doubt.

Proposals outside HAS20 site

Of great concern is that the efforts to render HAS20 acceptable turn upon a new pedestrian / cycle access between the proposed school and Westoning Road. Unless it is proposed to acquire land from the last house on Westoning Road, this new access will be west of the existing boundary / hedgerow and therefore outside the extent of HAS20.

This would be contrary to the assertion "The Council is proposing to withdraw the previous modification to amend the allocation boundary (regarding the school site). As such, the allocation boundary would remain as submitted" (3.11.21).

This separate pedestrian / cycle access to Westoning Road would involve land not included in either NLP381 or ALP117. Further it would invite future upgrading to a carriageway and be part of a justification for further development.

As well as casually including new land, further inappropriate development and loss of green belt is a major concern.

Capital provisions / s.106

The extent of the safety measure set out in Section 3.11 in order to make this site acceptable are extraordinary in their extent and potential costs including new bus stop facilities, paths, crossings and alterations to two rail bridges. Currently there is no capital allocation in the CBC spending plans for the Westoning Road and Toddington Road safety improvements and interventions. The extent of the proposed safety measures is considerable and are un-costed in document 113. The road and bridge safety scheme costs would be in addition to the costs of construction of the new school. The proposals already intend some developer contribution to sports pitches off-site, it is highly

questionable whether s.106 contributions from 435 high-density homes on a site adjoining a railway could cover all this.

The 2m wide footway / cycle route Improvements to Westoning Road are approximately 600m in length, would mean the loss of either carriageway, verge or layby parking, and would involve engineered crossing points over numerous residential access drives. The safety improvement if included would extend under the bridge which is currently unlit with a pavement approx. 900mm wide, and 25m in length.

The measures along Toddington Road are similarly extensive taking up carriageway or verge with pedestrian crossing improvements and potential carriageway re-alignment plus a 30mph speed limit to the site entrance (3.11.13) and traffic calming measures (unspecified) would similarly be costly and extensive.

All of which raises the disheartening possibility that HAS20 can only be feasible if supported by further release of green belt in the proposed Early Review to create financial contributions.

Response to 113: General Comments

Character

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.

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. 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.

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. A major change in context is the permission for the M1 / A6 road which the documents highlight as a material consideration. However, 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 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.

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 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.

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.