

Central Bedfordshire Draft Local Plan

Representations on behalf of Bedfordshire Land Promotions Ltd

August 2017



Caddington Brickfields, Dunstable Road, Caddington

Summary

This representation supports the allocation of land at Caddington Brickfields as part of the emerging Central Bedfordshire Local Plan

The document provides a review of the Council's draft Local Plan and the associated evidence base.

This review confirms the Council's assessment which is that:

- Land will need to be released from the Green Belt to meet development demands (Growth Options Study)
- Caddington is a sustainable location for development with a good range of local services (Settlements Capacity Study)
- The settlement could accommodate between 50 and 500 dwellings within the plan period (Settlement Capacity Study)
- The land, Location L25, in the Growth Options Study has few constraints and is well located with regard to services
- Green Belt parcel C4, as defined in the Green Belt Study, only has a moderate contribution to the Green Belt
- Transport impacts of development would not be significant, as set out in the Council's Stage 1A Transport Modelling

Policy SP1 of the draft plan is therefore supported, in so far as development for around 2,000 dwellings at Green Belt Inset Villages should be part of the overall strategy to meet development needs.

Land at Caddington Brickfields should be included as an allocation in the next round of plan making as part of this wider strategy.

In support of the promotion of Caddington Brickfields a design team has provided additional evidence which:

- Confirms that Caddington Brickfields represents a sustainable extension of Caddington
 - Provides opportunities for ecological enhancement as part of a wider masterplan
 - Minimises impact on the AONB through location of development
 - Confirms the land could deliver development within the short term
 - Provides a long term defensible Green Belt boundary for the village
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1 Introduction

- 1.1.1 These representations have been prepared by JLL on behalf of Bedfordshire Land Promotions Ltd (BLPL) in regard of circa 28ha (68acres) of land north of Dunstable Road, Caddington known as Caddington Brickfields.
- 1.1.2 The land is in the ownership of three parties, who have agreed to work together, and with BLPL, in the promotion of the land for development.
- 1.1.3 The extent of promoted land is shown in Figure 1, divided into parcels of land reflecting the function of the land in question.
- 1.1.4 A pack of material demonstrating how the promoted land could come forward for development in a sustainable manner has been prepared by a team including JLL, Peter Brett Associates (PBA) and Rummey Design. The evidence is included as an attachment to this submission.

2 The land

- 2.1.1 The extent of promoted land is shown in Figure 1 and southern area was formerly used for quarrying and the making of bricks, hence its generic name. The land is divided into 5 land parcels but we stress that it is not intended that residential development extends to all of this land as part of an allocation.
- 2.1.2 Land parcel 1 is already allocated in the South Bedfordshire Local Plan Review (2004) as site H1:19 and is shown on the plan for completeness as the land is controlled by BLP.
- 2.1.3 A planning application for residential development of the allocated land on parcel 1 is currently being prepared by the same development team and will be submitted to the council in the coming weeks.
- 2.1.4 Land parcel 2 is allocated within policy R8 of the South Bedfordshire Local Plan Review for "Allotments Gardens and Playing Pitches with changing facilities and/or informal open space". It is also subject of an extant planning permission (ref SB/TP/96/0745) for allotment purposes, access and parking.
- 2.1.5 The remaining land parcels (3, 4 and 5) are not allocated for development. All are currently located within the Green Belt and Parcel 5 is partly (Folly Wood only) designated as part of the Chilterns AONB.
- 2.1.6 Parcel 5 is included in the representation as it is within the control of the land owning group, though there is no intention that housing development extend into this area. Given the landownership control, there is, however, the opportunity for ecological enhancement and community benefit through utilisation of the land asset as part of the wider development proposals. The established wood and spinney also provide clear long term defensible boundary which can endure for the Green Belt boundary.

3 Representations & supporting material

3.1.1 Set out below are a series of comments, (both objections and support) in regard to the Draft Local Plan, Site Assessments and the Technical Reports issued as part of the consultation. A separate representation has been submitted in regard to each document via the Council's website and the sections below provide further evidence and comment, which could not be provided through the format of the website.

3.1.2 In support of these representations the following documents have been prepared and are submitted to the Council to provide further evidence:

Rummey Design, Land appraisal and masterplan

3.1.3 The document considers the relationship of the land with the existing village, notably the village centre and sets this within the wider landscape context given its' proximity to the AONB.

3.1.4 The document draws on evidence from the wider design team in regard to drainage, highways and ecology to produce a masterplan assessment of the development potential of the land.

PBA Technical Note – Ecology

3.1.5 Based on historical reports, desktop review and site visit, the note considers the existing site circumstances and ecological value. It provides commentary on the possible impacts of development and how these might be mitigated and a positive net outcome for ecology be arrived at.

4 Representation in regard to the Draft Local Plan

- 4.1.1 The central document subject to consultation is the Central Bedfordshire Local Plan 2015-2035 Draft Plan July 2017. The document is acknowledged to be a first draft plan which includes broad policies for “steering and shaping development”. It does not allocate specific sites for development but instead indicates “growth locations” on the basis of an overall “Spatial Strategy Approach” to meet an estimated requirement for 20-30,000 dwellings and 24-30,000 new jobs. All of this is to be tested and confirmed as the local plan process continues but the draft plan provides a useful starting point for plan making.
- 4.1.2 The overall strategy acknowledges the central issues in regard to the lack of significant brownfield sites and the past pattern of development, where development pressure has been met in the north of the district, whilst the need for development on the edge of Luton, to meet the urban area’s need, has been constrained by the Green Belt
- 4.1.3 The plan (para 5.3.2) acknowledges that, in order to help redress this imbalance, “it will be necessary to release land from the Green Belt in order to ensure delivery of sustainable development across Central Bedfordshire as a whole”. This view is taken forward to the Spatial Strategy Approach (Para 7.5) which confirms that, in order to meet the needs for the Luton HMA “This will mean releasing some Green Belt land”.
- 4.1.4 **We support this view and consider it vital that development is brought forward in the most sustainable locations to meet identified needs and this is likely to result in development of land which is currently designated as being within the Green Belt.**
- 4.1.5 Policy SP1 Growth Strategy sets out a number of broad locations for the delivery of growth, divided into the four areas of the district (Areas A – D). The draft Local Plan acknowledges that there will be no one approach which will satisfactorily meet the needs of the plan area and therefore proposes a combination of approaches including “village extensions” (para 5.3.4) as part of the overall strategy.
- 4.1.6 Area A relates to the area in the south of the district which is within the Luton HMA and is generally constrained by Green Belt. Within this area the draft policy indicates that development might come forward in one of four locations:
- North of Luton (around 4,000 homes)
 - West of Luton (around 2,000 homes)
 - Inset Green Belt Village (around 2,000 homes collectively)
 - M1 Junction 11 a – Strategic Employment Area. (around 40 ha of employment)
- 4.1.7 **Caddington is an inset Green Belt village within Area A and as such these representations strongly support the option for the delivery of 2,000 dwellings at Inset Green Belt Villages.**
- 4.1.8 The text of policy SP1 acknowledges that the larger urban extensions and new settlements proposed as options within the plan will take a considerable time to deliver development (para 7.2.3). Therefore, it is important that small and medium sized sites come forward which can help to meet the needs of the district in the short term.
- 4.1.9 Caddington Brickfields can start to deliver development early in the plan process, the three land owners are committed to bringing the land forward and there are no significant infrastructure investments required before development can commence.

5 Representation in regard of Site Assessment Technical Document

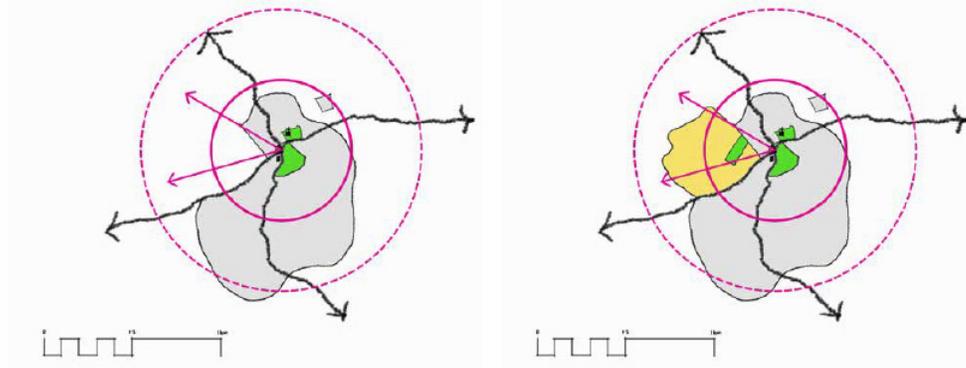
- 5.1.1 The Council issued a call for sites in April 2016 and the land at Caddington Brickfields was put forward at this time for consideration. Previously, a smaller land area (parcels 2 and 4) was put forward as part of an earlier stage of plan preparation.
- 5.1.2 In parallel with the draft Local Plan, the council has undertaken an assessment of all 847 sites which were received for consideration and within this both the larger site (ref NLP148) and the earlier smaller site (ref ALP143) were considered.
- 5.1.3 The Council applied a three stage process of assessment to all sites and the results issued in the Site Assessment Technical Document. The summary of all findings are included in Appendix D, whilst a separate document includes each of the Site Assessment Forms.
- 5.1.4 The Executive Summary of the document makes it clear that the findings are the “initial conclusions” of the site assessments and “it does not represent a full assessment of sites”. This is to be provided in a SHLAA, to be produced following the consultation/
- 5.1.5 The reports makes it clear that **“If it is considered that a site has been unfairly excluded then there is an opportunity to submit formal representations on this technical paper.”** (Para 8.1.1)
- 5.1.6 We therefore set out below formal representations in regard to the assessment of land at Caddington Brickfields which includes sites NLP148 and ALP143.
- 5.1.7 Site NLP148 was discounted at Stage 1B of the assessment process. The Council concluded that the *“Site does not represent a logical extension to Caddington as it would extend the settlement in an unsustainable way”*
- 5.1.8 Site ALP143 was discounted at Stage 2. The Council concluded:
- 5.1.9 *Fails Stage 2, based on an overall consideration using planning balance. The following issues have been identified: Comments from consultees indicate issues in regard to its locality to the AONB and its potential impacts on this and the ‘Folly Wood’ County Wildlife Site. Furthermore there would be a significant impact on an area of ecological interest surrounding the CWS. The Caddington and Slip End’s neighbourhood plan splits the site and highlights it as having both low and average suitability. The topography of the site is uneven. The site is therefore not worthy of further consideration”.*
- 5.1.10 The assessment raises a series of issues which we believe have been judged inappropriately and which, taken together constitute an “unfair exclusion” from further assessment.
- 5.1.11 We set out below the arguments in regard to each of the main headline comments:

A logical extension to Caddington

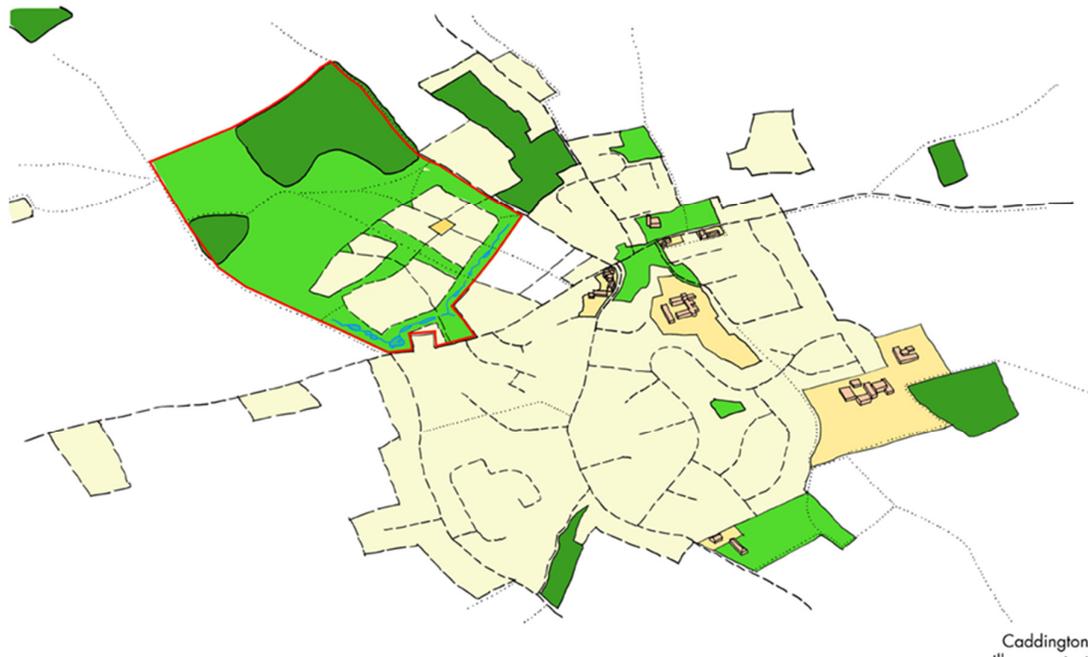
5.1.12 The land at Caddington Brickfields is located immediately to the north west of the village centre and the supporting masterplan document produced by Rummey Design demonstrates clearly how the village has grown asymmetrically since the 1950s southwards, away from the village centre, but not northwards. As a result, the village is now unbalanced, with the majority of housing located some distance from the local shops and facilities which are all in the centre, around the Church and Village Green:

The proximity to the village centre shows the potential to create a strong affinity to the village, by creating good connections

Good foot and cycle path connections to the village centre means development can be tailored to the green network and to the overall village form



5.1.13 Caddington Brickfields, as shown below, represents a clear opportunity to round off the settlement, creating a new village quarter, to provide housing and public open space, amenities within easy walking distance of the local facilities arranged around the village green.



A sustainable development

- 5.1.14 The Council's assessment considers that development would be an extension of the settlement in an unsustainable way. However, the assessment detailed in the Rummey Design masterplan document clearly demonstrates that the location is in close proximity to the village centre with existing and proposed walking and cycling routes linking new development to enable movement using a range of modes.
- 5.1.15 More widely, the location is served by three bus services that route in close proximity to the site, (services 231, BMH1 and 62). The nearest bus stop is only 100m west of the proposed development access and services include routes to the local schools as well as Dunstable and Luton town centre. In addition Bus route 232 is a South Beds Dial-a-Ride service, and connects Pepperstock to Dunstable, providing links to the Asda Superstore in Dunstable and the Tesco Store Skimpot Road.
- 5.1.16 Alongside the existing bus services, it is understood that as part of the Caddington Wood development on Chaul End Road, there is to be a community bus service provided in the vicinity. This service is intended to provide a daytime link between Caddington Village, the schools at the Southern Campus and also to the Luton to Dunstable busway to the north. Since the community bus travels past Caddington Brickfields there will be an opportunity to link into, and potentially enhance, the service.
- 5.1.17 As regards rail links, Luton Railway Station is located 3.7km north east of the site, and Luton Airport Parkway Railway Station is 4.4km east. They are accessed via A505 and A1081 respectively. Luton Railway Station can be accessed by via the 231 bus, the journey time (including a 10 minute walk) would be less than 30 minutes.
- 5.1.18 Therefore, it is clear that any development at Caddington Brickfields could be served by a range of modes, not just the car.
- 5.1.19 Very early proposals for a masterplan for the site clearly demonstrate how the site might come forward in a sustainable manner, including a significant buffer of land between the proposed development and the County Wildlife site and AONB to the north and west. This buffer of land may be used for public open space, both formal and informal, depending on the requirements of the local community.
- 5.1.20 Within the developed area, the masterplan demonstrates how open space could be provided for informal recreation and also to address surface water drainage through the implementation of SUDs.

Potential impacts on the AONB

- 5.1.21 Land to the west and north of the land is part of the Chilterns AONB and the extent of the site includes land within the AONB. However, the masterplan produced in association with these representations demonstrates that no development is proposed within the AONB and that impact on the scenic beauty of the AONB can be protected and enhanced.
- 5.1.22 The masterplan demonstrates how the density of development can reduce closer to the edges of the site, minimising impacts and enabling the creation of a landscape structure which will relate well to the AONB and create a suitable transition to the designated land.

Potential impacts on 'Folly Wood' County Wildlife Site and the area of ecological interest surrounding it

- 5.1.23 The Ecology Technical Note produced by Peter Brett Associates and submitted alongside these representations provides an assessment of the existing habitats and concludes that the most valuable ecological features within the site are the areas of broad-leaved woodland, namely, Folly Wood County Wildlife Site and Cradle Spinney.
- 5.1.24 A proportion of the Site comprised recently cut grassland and cleared scrub vegetation, with the remainder dominated by arable fields. Therefore the majority of the land is considered to be of negligible ecological value.
- 5.1.25 The site could support a range of protected species, possibly including great crested newts, reptiles, breeding birds and foraging and commuting bats. However, the habitats for these will generally be the woodland and hedgerow edges which can be retained and enhanced as part of a comprehensive masterplan. The draft masterplan has been designed to avoid and reduce potential adverse effects on the most valuable ecological features within the Site.
- 5.1.26 Significant opportunities could be taken to protect and enhance retained habitats in order to deliver a net gain in biodiversity, in accordance with relevant planning policy.

The Caddington and Slip End's neighbourhood plan assessment

- 5.1.27 The Neighbourhood Plan was subject of consultation in July 2016 and at that point in time objections were raised on behalf of the land off Dunstable Road (Caddington Brickfields). These representations were duly made but there has been no response received to date.
- 5.1.28 It is understood that the Neighbourhood Plan is with the District Council prior to submission for examination.
- 5.1.29 When the plan is submitted for examination, a robust case will be made based on our representations that the land at Caddington Brickfields represents a sustainable location for development and the assessment made in the Neighbourhood Plan therefore misrepresent the credentials of the land. The case will be made that the Neighbourhood Plan should be amended to reflect the reality, which is that the land has high suitability for development as it provides a sustainable opportunity for development of the village, as discussed elsewhere in these representations.
- 5.1.30 However, until the examination, it will not be possible to refute the assessment made by the Neighbourhood Plan team. Until this has been tested, we insist that little weight can be given to the assessment or indeed the Neighbourhood Plan.
- 5.1.31 It should also be noted that the emerging Neighbourhood Plan took as its starting point the adopted local plan, which will be replaced by the emerging plan. Therefore the Neighbourhood Plan will be out of date soon after, or maybe even before, it is adopted. The lower level plan should, rightly, take its strategy from the higher level plan and this will result in a revision of the Neighbourhood Plan being required if it is not immediately to be out of date.

The topography of the site is uneven

- 5.1.32 We are unsure as to what this reference alludes to, unless parcel 1 which is already allocated. The topography of Caddington Brickfields land undulates gently, sloping generally towards the south west providing natural growth for the village. Parcel 4 does have some unevenness reflecting its previous use as part of the brickmaking process, but this is not so significant as to preclude development.
- 5.1.33 Ground investigation of all parts of the site will be necessary prior to development of any site, but it is not considered that ground conditions in this location would be so severe as to preclude the allocation of land per se.

Conclusion

- 5.1.34 In conclusion, it is clear that the scalable options proposed for Caddington Brickfields:
- ✓ Provide ample scope for managing the scale and distribution of new development at Caddington.
 - ✓ Can be designed not to conflict with local plan strategic policies for promoting sustainable development.
 - ✓ Provide ample justification for the development as proposed in the location proposed (the "new" quarter) such that the proposals should be included for consideration in the next iteration of the Local Plan

We argue that the land at Caddington Brickfields has been "unfairly excluded" from consideration as part of the emerging Local Plan and the case is clearly set out above (and in the supporting documents) that the location can come forward as a sustainable extension to the village of Caddington to meet local needs.

6 Representations in regard to the Luton HMA Growth Options Study

- 6.1.1 The Council's study considers sites identified through the call for sites against a series of criteria including deliverability, viability, environmental constraints and accessibility.
- 6.1.2 The study considered 32 locations within the HMA which were not bound by "primary constraints" such as AONB. Each was then applied to one (or more) of 5 spatial themes including New Settlements, Village Extensions, Growth in Transport Corridors, Urban Extensions and Urban Intensifications.
- 6.1.3 The land at Caddington Brickfields was included in this assessment as site "L25 Caddington NW" which amounted to 20.4ha and the council assumed a capacity of 368 dwellings.
- 6.1.4 The assessment concluded that the location was not within 1.2km of a public transport hub, but on all other measures the location performed well and generally was amongst the best performing of any locations.

Secondary constraints

- 6.1.5 The location is subject to only three "secondary constraints":
- Priority Habitat Inventory – this is in regard to the proximity to the County Wildlife Site at Folly Wood. An ecological assessment has been undertaken considering the current status of the wood and surroundings. In turn these findings have been used to inform the draft masterplans, which clearly describe the relationship between the site and the designated area, how development impacts might be mitigated and how ecological benefits might be delivered as part of a comprehensive and co-ordinated approach.
 - Grade 1, 2 or 3 agricultural land – the land is identified as Grade 3, the lowest level identified by the assessment and this is an attribute consistent with all other sites assessed, as they are all green field in nature.
 - Surface water flooding – In line with almost all of the locations identified, surface water flooding could be an issue for development but the draft masterplans demonstrate how the land can be developed in a sustainable manner, including a drainage solution to manage surface water runoff.
- 6.1.6 Three secondary constraints is the lowest of any location considered and demonstrates the lack of constraints to development in this location.

Services and facilities

- 6.1.7 The location is shown to be within easy walking distance of major employment areas, open space, schools, neighbourhood centres, health care facilities and bus stops, reflecting its location on the edge of the village and the opportunities for future residents to access day to day facilities by foot and cycle.
- 6.1.8 It would support vitality in the community and could include small business potential.

Contribution to Green Belt Purposes

- 6.1.9 The Growth Option Study drew on the findings of the Central Bedfordshire and Luton Green Belt Study, which is also issued as part of the evidence base for the Local Plan.
- 6.1.10 The Green Belt study divided the area into a series of land parcels and the land at Caddington Brickfields corresponded generally with Parcel C4. The Green Belt study considered each parcel against the purposes of Green Belt to come to an overall assessment of the role of the location in question.
- 6.1.11 The Green Belt assessment produced by the Council confirms that the impact of the land at Caddington Brickfields is generally “none or weak” or “relatively weak”, with only one purpose (Safeguarding Countryside) being considered to be “moderate”.
- 6.1.12 The finding of the Green Belt Study is brought forward as part of the Growth Options Study, which concludes that the overall score for the location L25 is “moderate”.
- 6.1.13 We consider the assessment of the purpose “Safeguarding the countryside from encroachment” should be reassessed to “relatively weak” given the character of the land parcel which includes existing residential areas and the clearly defined boundaries (Bridleway, woodland and Chaul End Road) which encloses the land and provides a clear long term defensible Green Belt Boundary.
- 6.1.14 However, even as an assessment of “moderate”, the impact of the land parcel is the lowest of any of the locations assessed as part of the Growth Options Study.

Deliverability

- 6.1.15 The delivery of locations is judged on a balance of availability of land and likely demand for the scale of development put forward.
- 6.1.16 The land at Caddington Brickfields is clearly available and the council acknowledge this.
- 6.1.17 However, the Council consider that it is only “moderately likely” that there is demand for the scale of housing now and in the future at this location.
- 6.1.18 The assessment for Location L25 in the Appendices suggests that there might be “*poorer access to quality of life attractions (cultural, sports, leisure and/or natural assets) and less convenient access to employment and amenities*”. However, this can only be a very marginal difference to Location L24 (West Luton) which is close by to the east and has a “Highly likely” score.
- 6.1.19 From the marketing assessments carried out for parcel 1 (Caddington Oaks) we know there is clear and strong demand for accommodation in this location, with its proximity to the village centre of Caddington as well as having access to the wider countryside, links to the wider urban area for a larger range of services and facilities, as well of course as employment. It is therefore suggested that this assessment is arbitrary.

Viability

6.1.20 The Council finally considers the potential viability of each location and concludes that it is highly likely that location L25 would be viable and therefore deliver development, if it were to be allocated.

Summary

6.1.21 As set out above, the Council's assessment of Location L25 clearly confirms that it:

- Is relatively unconstrained by designations
- Is well connected to services and facilities which would be accessible through a range of travel modes
- Does not contribute strongly to any Green Belt function
- Would be deliverable
- Would be viable

6.1.22 **It is therefore considered that, by the Council's own assessment, Location L25 should be considered further as a potential sustainable location for development as part of the emerging Local Plan.**

7 Representation in regard to Settlement Capacity Study

- 7.1.1 The Council's initial study seeks to determine how much growth could be sustainably accommodated within existing settlements. It considered the capacity of existing settlements but did not factor in the availability of additional land as part of the study. It therefore is only an initial approach and a final report will be prepared following consultation to support the emerging local plan.
- 7.1.2 Settlements which have a basic range of services and facilities which might be suitable for accommodating development growth were identified from the total stock of settlements within the district. A total of 75 settlements were considered as part of the study, including Caddington.
- 7.1.3 The assessment concluded that Caddington does provide a suitable level of services and facilities to be a sustainable location for development and the Initial Capacity Assessment indicated that the settlement does have a **Low-Medium capacity**, assuming the Green Belt were to be released. (A Low capacity might be available if there is no change to the Green Belt boundary).
- 7.1.4 The Low-Medium assessment suggests that the settlement might deliver between 50 and 500 dwellings within the plan period and this is well within the range which might be provided for by Caddington Brickfields.
- 7.1.5 The evidence provided in support of this representation can be used by the Council in the next stage of the assessment, in order to demonstrate the delivery of development for the settlement.

8 Representation in regard to Transport Modelling

- 8.1.1 In order to provide information regarding the performance of the road network under different scenarios, the council commissioned transport modelling to assess the cumulative impacts of growth in a single forecast year, 2035.
- 8.1.2 The modelling included a reference case which assumed no local plan growth, and then 5 Scenarios each providing the same level of overall growth but distributed differently, reflecting different plan strategies.
- 8.1.3 In all growth scenarios the road network shows some stress, but the points of stress vary in location depending on the scenario chosen. The modelling shows hotspots where road or junction conditions are poor but infrastructure investment, notably in public transport as well as highway schemes, can minimise or neutralise the impacts of additional growth.
- 8.1.4 Further stages of work will be undertaken to firstly consider what mitigations might be implemented for key network constraints and thereafter testing of shortlisted allocations using the model.
- 8.1.5 For the current round of testing, a Volume over Capacity analysis of the Reference Case was produced which showed the road network around Caddington as largely free flowing and operating within capacity (Para 4.2) Luton Road, linking Caddington to Luton, is shown as amber in the morning and evening peak, reflecting the movement of commuters into and out of Luton at either end of the day.
- 8.1.6 As per the table below, development at Caddington Brickfields is included within the modelling for Scenario 1, 2, 3 and 5 of the testing, as part of the Green Belt Villages allocation of 2,000 dwellings.

Growth Area	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
A					
North of Luton	4,000	4,000	4,000	-	4,000
GB Villages	2,000	2,000	2,000	-	3,000
West of Luton	2,000	-	2,000	-	-
Total Area A	8,000	6,000	8,000	-	7,000
B	12,000	9,000	3,000	12,000	4,500
C	9,000	9,000	9,000	9,000	6,650
D	1,500	1,500	1,500	1,500	2,500
Total	30,500	25,500	21,500	22,500	20,650

- 8.1.7 The modelling assumes the site capacity as calculated in the Growth Options Study, which indicated a delivery of 368 dwellings
- 8.1.8 In scenarios 1 and 3 land to the West of Luton (2,000 dwellings) is also included within the scenarios tested. Scenario 4 includes neither Caddington Brickfields nor land West of Luton.

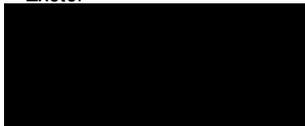
- 8.1.9 Unsurprisingly the findings show that, where development at Caddington Brickfields **and** West of Luton are included in the modelling (Scenario 1 and 3) the volume/capacity ratio on Luton Road increases to a ratio of more than 95%. However, in scenario 2 and 5 (where only Caddington Brickfields is included) the ratios remain as per the base case (85 – 95%) and there are no junction delays.
- 8.1.10 This picture is the same for other local roads around Caddington, including Chaul End Road, where growth at West of Luton results in the link operating at 75-85%, whilst scenarios where this area isn't development but Caddington Brickfields is, the volume/capacity ration remains less than 75%.
- 8.1.11 This remains an initial and high level modelling exercise but the findings demonstrate that development at Caddington Brickfields can be accommodated within the local highway network without resulting in roads operating over capacity or the creation of local "hot spots".



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