

Representations to the CBLP Settlement Capacity: Initial Study

Introduction

- 1.1 This representation is submitted on behalf of our client, Legal and General Capital (LGC), to the (Regulation 18) consultation of the Central Bedfordshire Local Plan (CBLP) and the associated Technical Report and Site Assessment Results.
- 1.2 LGC are the owners of 18 hectares of land to the east of Slip End, in the south of the Central Bedfordshire Council (CBC) administrative area and to the west of M1 Junction 10, and are working in collaboration with the Luton Hoo Estate (LHE) who own an adjoining 1.65 hectares of land. This combined circa 19.6 hectare site is being promoted as a residential led extension to the village of Slip End of circa 300 units, referred to in these representations and supporting documents as 'Slip End East'.
- 1.3 The full representations comprise:
- covering letter;
 - plan confirming combined LGC and LHE land holding;
 - separate representation forms responding to:
 - specific individual policies of the Draft Local Plan, notably those relating to the spatial strategy, housing growth location options and other more detailed policies;
 - specific technical reports, notably the Settlement Capacity Initial Study, Central Bedfordshire and Luton Green Belt Study, Sustainability Appraisal, Luton HMA Growth Options Study; and,
 - the Site Assessment Technical Document conclusions relating to NLP227 and ALP069
 - Technical reports supporting the representation forms, namely:
 - Green Belt Study by Allen Pyke Associates;
 - Landscape Appraisal by Allen Pyke Associates; and,
 - Access and Transport Review by Odyssey Markides.
 - Slip End East Vision Document by LDA.

Summary

- 1.4 Our representations to the various technical reports highlight and support the numerous positive attributes of the Slip End East site which are stated throughout the CBC evidence base, including matters of sustainability and lower Green Belt impact.

- 1.5 However, our review has also identified a number of errors, misjudgements and inconsistencies. LGC note that the reports are often tabled as preliminary and that corrections are invited from site promoters. Our representations therefore strongly object to the findings as follows.
- 1.6 Whilst the current evidence base set out in the Settlement Capacity Initial Study confirms Slip End has a medium to low capacity, i.e. it has capacity to accommodate an expansion of between 50-500 homes, this has been predicated on the basis of a perceived lack of education and healthcare expansion potential, and inaccurate public transport information. Our representation corrects these errors and confirms Slip End should qualify as having at least a 'medium' capacity for expansion and has excellent grounds for a conclusion of a 'high' potential. Whilst already among a small cohort of larger villages with capacity for expansion, this would result in Slip End scoring even higher, emphasising it's suitability for a future allocation in the CBLP.

Representations

Current conclusions of the Settlement Capacity: Initial Study

- 1.7 With regards to Slip End, the conclusion within the table following paragraph 3.2 (page 23) is that it has an initial capacity of 'medium to low (without Green Belt release: low)' i.e. 'an indicative capacity rating' of 50-500 homes.
- 1.8 The related conclusion at page 112 of the Settlement Capacity Initial Study- Appendix A Area A Assessments (Slip End) is as follows:
- 'Overall, development of a sufficient scale could support improved service and facility provisions, however this may affect environmental amenities and settlement identity. There are opportunity areas for small scale sustainable development that is well connected with the existing urban area, and could deliver development gains with a range of housing for the local community, and support Neighbourhood Planning proposals, however, small scale development may also increase reliance on the private vehicle'.
- 1.9 In this context, our comments and objections with regards to the Initial Study's conclusion in respect of the settlement capacity of Slip End are set out below.

Objections

- 1.10 LGC object to the conclusion regarding the capacity of Slip End as LGC believe it should achieve at least a 'medium capacity' score, and has the potential for a 'high-medium' capacity score. This is principally on the basis that Slip End is within 2 miles (straight line distance) of Luton Airport Parkway, which is a mainline railway station; a factor which

appears to have been overlooked in the assessment and would dictate a 'high' score with respect to the stated criteria. In addition, the detailed assessment for Slip End provided at page 109-112 of the Settlement Capacity Initial Study- Appendix A Area A Assessments is identified as having the following specific shortcomings:

- Page 110 states that Slip End Primary School 'cannot accommodate expansion' and this feeds through to the 'communities' capacity assessment at page 111. However, the emerging Caddington and Slip End Neighbourhood Plan includes Proposal CS15: land to the rear of Slip End School which requires 'the provision of land to allow for the future expansion of Slip End School'. Further this land is stated in the Neighbourhood Plan assessment as being owned by Central Bedfordshire Council¹.
- the 'communities' capacity assessment at page 111 refers to a lack of healthcare facilities and the presence of only a convenience store. This overlooks the allocation within the emerging Caddington and Slip End Neighbourhood Plan at Proposal CS15: land to the rear of Slip End School which requires 'the provision of land to allow for the future development of a satellite primary healthcare facility' and that provision could also be made as part of any urban extension to Slip End, as demonstrated in the submitted Slip End East vision document which includes a 'community hub' for such uses. LGC also understands there is existing capacity at the Caddington and Markyate GP surgeries.
- Page 110 states that there are no employment areas in the village whilst the emerging Neighbourhood Plan refers to employment at Slip End Garages (Citroen Main Dealer) and the off-airport parking facility and associated operations within the village (Airparcs and Paige Parking).
- Page 110 states that Slip End 'only has a limited number of bus services which operate infrequently and not on Sundays' and refers only to service 202 from Caddington and Slip End to Harpenden. This is incorrect as the 202 bus route has been replaced and Slip End is now served by bus routes 46 and 231. Both routes run an hourly service in each direction, Monday to Friday from 07:00 to 18:30. On Saturdays, there is a reduced service on the 231 but 46 continues with an hourly service from 08:30 to 18:30. Both routes serve key local destinations (route 46 - Luton, Slip End, Dunstable, Markyate, Flamstead, Redbourn and Hemel Hempstead, and route 231- Dunstable, Caddington,

¹ (see <http://consultation.caddse.info/data/documents/App3pt3-CaSE-Site-assessmentsonline-consultation.pdf> (section - land to rear of Slip End School)).

Woodside, Pepperstock, Slip End, Farley Hill, Luton, Barnfield College and Bushmead). In addition, Slip End is served by South Beds dial-a-ride service which is in keeping with CBC's Passenger Transport Strategy to encourage community transport solutions. It is approximately a 7 to 9 minute walk from the 46/231 bus stop to Luton railway station. There are also two school bus services (BHM1 and 846) serving Slip End. Clearly, the existing provision could also be improved through a fair and reasonable public transport contribution from any proposed development.

- Page 112 states that 'the urban area is surrounded by designated Green Belt land indicating a low capacity'. In the context of the CBLP findings that Green Belt release in the Luton HMA is necessary, this observation is not valid. In addition, the CBC Green Belt Study Stage 1 confirms that Slip End contains a 'relatively weak performing area of Green Belt' as per the conclusions at figures 4.1-4.5 and table 4.1 (page 30), where it was that Slip End should advance to stage 2 of the GB assessment.

1.11 LGC contend that when the above is taken into account the capacity of Slip End is at least 'medium capacity' score, and has the potential for a 'high-medium' capacity score, and therefore request that this technical report is updated in order to ensure a sound evidence base.