

29 August 2017
covering Letter-final for LA-FINAL



Central Bedfordshire Local Plan Representations
Central Bedfordshire Council
Priory House
Monk Walk
Chicksands
Shefford
SG17 5TQ

Andrew Fido
E: afido@savills.com
DL: +44 (0) 1202 856 835
F: +44 (0) 1202 856 801

Wessex House
Priors Walk
East Borough
Wimborne BH21 1PB
T: +44 (0) 1202 856 800
savills.com

By email to: localplan@centralbedfordshire.gov.uk

Dear Sir or Madam

Regulation 18 Consultation for the Central Bedfordshire Local Plan – Representations of behalf of Legal and General Capital

Introduction

This letter comprises representations on behalf of our client, Legal and General Capital (LGC), to the above (Regulation 18) consultation of the Central Bedfordshire Local Plan (CBLP) and the associated Technical Report and Site Assessment Results.

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. Together this land is being promoted as a residential led extension to the village of Slip End of circa 300 homes, referred to in these representations and supporting documents as 'Slip End East'.

Legal and General Capital and the Luton Hoo Estate

Legal & General Capital (LGC) is part of the Legal & General Group. LGC was created in 2013 in order to invest the Group's capital, at an early stage, in the heart of industries where there has been a chronic shortage of investment and innovation. Because LGC are able to take a long-term view, they can invest at an early-stage to create assets where they know there will be a long-term demand. LGC identifies housing as one of their key investment areas, where there is opportunity to make a positive and economic contribution to the UK. As such they have invested in the world's largest modular housing factory that can deliver 3,500 homes per year and have created their own housebuilder - Legal & General Homes (Communities) to develop homes on sites that LGC own. LGC seek to create a legacy that they are proud of. They want to challenge and change public perception of new homes by delivering a product that surpasses buildings of the past in terms of quality, efficiency and comfort, whilst at the same time recognising the character of its local context. As such LGC endeavour to create highly sought after destinations, which have top quality design and specifications, not only in their houses but also in their landscaped areas and non-residential elements of their developments.

Luton Hoo is a traditional country Estate that has successfully adapted to modern demands and once included one of England's finest stately homes. While the main mansion house was sold to a hotel group in 1999, the rest of the Estate has remained in the same family since 1903, when Sir Julius Wernher bought the property. The Estate continues to thrive, evolve and develop. Over the years the Estate has been a key driver of both the landscape and townscape of South Bedfordshire and continues in its important role today,

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



providing a significant contribution in terms of business and homes for the area. At the same time, the Estate is committed and uniquely placed to preserve the local environment and heritage for the future. The Estate is acutely aware that surrounding villages and parishes are under huge pressure to grow whilst also trying to maintain their existing sense of community. Growth is needed in order for rural areas to survive and the Estate is working hard to continue to find the right balance.

The landholdings

Both landholdings were previously submitted to the CBC Call for Sites, with the LGC land given reference NLP227 and the LHE land given reference ALP069 in the Site Assessment Results.

Summary / overview of representations to the Central Bedfordshire Local Plan

These representations broadly support the Local Plan spatial strategy and its efforts to plan positively for the long term future of Central Bedfordshire, particularly the need to release Green Belt land within the Luton HMA (Area A) through both strategic sites and the expansion of larger towns and villages within the Green Belt to deliver circa 8,000 homes overall, of which 2,000 are to be delivered through the expansion of Green Belt villages.

LGC are, however, concerned that even if all the potential growth options within Area A- South are taken into account, the CBLP is at risk of falling significantly short of providing for enough housing within the Luton HMA.

We are also concerned that the Local Plan sets out key growth location options and a wide ranging housing target without identifying individual sites for allocation. We submit that a further round of public consultation should be completed before, and separate to, the Regulation 19 Consultation, in order to help ensure that the CBLP it is likely to be found 'sound'.

The LGC/LHE site at 'Slip End East' is in full accordance with the housing growth location option of expanding large villages within the Green Belt close to Luton, delivering a wholly sustainable development of circa 300 homes through a sensitive extension to the village, benefiting from and with potential to expand the existing community facilities, with minimal Green Belt impacts and including the provision of a substantial area of green open space.

The proposals would be compatible with the option of a strategic site to the West of Luton, or could equally provide part of an alternative spatial strategy if progressed alongside a strategic site to the North of Luton.

Summary / overview of representations to the technical reports and site assessment findings

The LGC 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.

However, our review has also identified a number of errors, misjudgements and inconsistencies in the supporting technical reports and site assessment findings. We 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:

- **Settlement Capacity** – whilst the current evidence base 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 ‘medium-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 its suitability for a future allocation in the CBLP.

- **Green Belt Study** – the GBS already makes positive conclusions for the site which advanced to the stage 2 assessment owing to a finding of a ‘relatively weak performing area of Green Belt’ (GBS Figure 5.2). At stage 2 it found *‘development here would still retain a degree of separation from Luton and would relate to Slip End rather than being associated as sprawl’* and *‘most of the parcel relates more strongly to settlement than the wider countryside, and both Slip End and Pepperstock have an urbanising influence’*. Para 6.12 of the GBS acknowledges a role for further evaluation and targeted assessment including consideration of *‘potential measures to mitigate harm, for example, the type, layout, massing, materials and landscaping of development’*. Our representations include a detailed targeted assessment in the form of the Allen Pyke Associates Green Belt Review and a site specific masterplan concept within the Slip End East Vision Document. Together these confirm that the site is suitable for consideration for release from the Green Belt as a *‘discreet and self-contained piece of land that has the capacity to accommodate development without any appreciable effects on the character of the adjacent countryside or the integrity of the surrounding Green Belt – unlike the other parcels at Slip End’*.
- **Sustainability Appraisal** – the SA confirms positive attributes to development at Slip End including: *‘opportunities for limited allocations...promoting sustainable development in areas that have seen little growth due to Green Belt Restrictions....delivering unmet housing need from Luton close to where it arises where there is the capacity to do so sustainably’*. LGC note and support the comment that the expansion of the village should be considered as part of a collective of settlements in the Green Belt for allocations to be decided through the next stages of the CBLP. This is commensurate with its status as a ‘Large Village’ in the defined CBLP settlement hierarchy.
- **Luton HMA Growth Options Study** – the GOS confirms positive attributes to development at Slip End including: low secondary constraints, no areas making a ‘relatively strong’ or higher overall contribution to Green Belt, with the site scoring as one of the highest performing options. Notably the assessment of a low Green Belt impact supports our case that the CBC GBS assessment (see above) is overly negative.
- **Site Assessment** – whilst this confirms the Slip End East site (NLP227 and ALP069) is *‘a logical extension to Slip End and is not in an isolated area, nor does it extend too far away from the main settlement’* it then erroneously rules out the site for two reasons. The first is not being able to accommodate at least 100 homes when it is clear from our original representations that the site has capacity for at least 300 homes. Site capacity is now confirmed beyond doubt through the masterplan concept presented within the Slip End East Vision Document which forms part of these representations. The second stated criticism of the site relates to Green Belt and an alleged risk of visual coalescence with the nearby hamlet of Pepperstock. Our submission points out that a strict interpretation of the criteria wording is that it only applies to the coalescence of towns and villages rather than hamlets. Notwithstanding this point, the masterplan concept presented within the Slip End East Vision document which forms part of these representations confirms a layout that provides open space on that part of the Site closest to Pepperstock and Luton, therefore avoiding coalescence. It also points out that the proximity to Pepperstock is no worse than other sites which have been found acceptable in terms of this criteria. Finally, our representations apply the full stage 2 and 3 criteria and conclude that there is no valid reason to rule out the site from consideration for a residential allocation.

Conclusion

In the context of an emerging plan that confirms Green Belt release is necessary in the Luton HMA in order to meet acute housing need with this to be achieved through extensions to larger Green Belt villages, we submit that a carefully designed residential led development at Slip End East with associated open space and green buffering providing up to 300 homes would have a limited impact on the purposes of the Green Belt and would result in an inherently sustainable development that accords with the provisions of the NPPF, a conclusion which is supported by our review of the evidence base (once corrected in line with our representations), and as demonstrated within the submitted Slip End East Vision document and masterplan concept.

We therefore seek that the technical documents are corrected such that sites NLP227 and ALP069 are found as appropriate for a future allocation, allowing the CBLP to move forward on a sound evidence base.

Form of these representations

For the avoidance of doubt these representations comprise:

- this covering letter;
- plan confirming combined LGC and LHE land holding;
- individual representations 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 Review 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.

If you have any questions regarding these representations please do not hesitate to contact me.

Yours sincerely



Associate Director
Enc. As noted
cc. Lauren Aitchison, L&G Capital