

20th November 2015

David Carter
Strategic Planning
Luton Borough Council
Town Hall
Luton
LU1 2BR

Dear David

**Pre-Submission Luton Local Plan (2011-2031) Regulation 19 Consultation and
Accompanying Sustainability Appraisal Consultation**

Duty to Co-operate

The Council asks whether respondents' believe its Local Plan complies with the Duty to Co-operate. It is not possible to answer this question because the Council has not provided any DCLG Planning Practice Guidance evidence to support its statements about co-operation. The Council's neighbour Central Bedfordshire Council has approved a Framework Plan for the North of Luton that cuts off South Central Bedfordshire Parishes' access to Luton along Sundon Park Road. Luton Council say in their Local Plan there is limited access from the North to Luton and that this will cause increased congestion in the Borough over the period of the Local Plan. So for Central Bedfordshire to cut off access to Luton indicates a lack of co-operation on transport policy.

Policy LP2 Spatial Strategy

This policy is **unsound** because it does not deliver the 17 800 new houses identified in the Council's Strategic Housing Market Assessment.

Policy LP4 Green Belt

This policy is **unsound** because it does not specify the special circumstances that permit inappropriate development. Large scale housing and commercial development on the Green Belt has been deemed inappropriate by Planning Inspectors. Luton is encircled by Green Belt and crossed north of Luton by the Chilterns AONB. Meeting Luton's unmet housing in these areas constitutes inappropriate development.

Policy LP5 Land South of Stockwood Park

This policy is **unsound** because there is no master development plan for the area that could possibly achieve the policy objective of conserving and enhancing the appearance of the adjoining Green Belt, Area of Great Landscape Value, County Wildlife Site, QE11 Playing Fields and the Chilterns AONB.

Policy LP8 Napier Park

This policy is **unsound** because it does not deliver a large enough contribution towards meeting Luton's need for 17 800 new houses. Land for office and industrial uses at Napier Park has been available since November 2014 and the site is yet to deliver any employment spaces.

Policy LP9 Power Court

This policy is **unsound** because it does not deliver a large enough contribution towards meeting Luton's need for 17 800 new houses. Luton's previous 2001 – 2011 Local Plan allocated Power Court for development as a mixed housing and business site over 10 years ago. No developer has put forward a master plan for this area since 2006.

Policy LP16 Affordable Housing

This policy is **unsound** because it does not ensure the delivery of the 20% affordable housing the Council's Strategic Housing Market Assessment says is needed. The amount of affordable housing depends on house prices, the cost of borrowing or renting and the economic viability of development sites. The Council has no control over house prices or the cost of borrowing. Nevertheless if a development site is unviable because of the need for 20% affordable housing the Council could provide support to ensure its viability.

Policy LP38 Pollution and Contamination

This policy is **unsound** because it does not stipulate air quality management for known poor air quality areas. The Council's Annual Public Health Report 2013 – 2014 (page 64) sets out the number of deaths and reduced life expectancy caused by air pollution in Luton. The approaches to Luton Airport are not within an Air Quality Management Area therefore the impact of increased vehicle movements due to the recently approved expansion of operations at London Luton Airport is not being assessed and reported. The Council's Air Quality Assessment 2012 says the airport approach has air pollution exceeding the Air Quality (England) Regulations 2000. The potential adverse impact of vehicle emissions on air quality caused by new development at Napier Park and Power Court has not been properly considered in the Council's Sustainability Appraisal.

Please notify me at the above address when the Local Plan has been submitted, when the Public Examination Hearing will occur and when the Local Plan is adopted. I would like to appear at the Public Examination Hearing.

Yours sincerely

Michael Stennell

Vice Chair and Area Planning Representative, Central Bedfordshire (North)