

Framework Plan Consultation
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Shefford
SG17 5TQ

Central Bedfordshire Framework Plan for North of Luton Consultation Representations November 2014

'Objection' representations by CPRE Bedfordshire

Dear Sir

We consider the North of Luton Framework Plan premature as Central Bedfordshire's Development Strategy which is the reasonable basis for the Luton North Strategic Land Allocation and the cessation of its Green Belt designation has not yet been examined and approved by a Planning Inspector. A possible outcome of the Inspector's examination is the geographical extent of this Strategic Allocation could change or reasons for the cessation of its Greenbelt designation refuted. Because of this context we were extremely disappointed with the presentations and literature available at the recent exhibition at Sundon Village Hall as these facts were not made clear to members of the public.

The Framework Plan is the first time the route for the M1-A6 link has appeared on Luton North Strategic Land Allocation maps. It is now clear that road and housing is planned to be built on the North Chilterns Area of Outstanding Natural Beauty. The roadway's route has not featured in either the Draft or Pre Submission Development Strategy consultations. Framework documents and staff at the exhibition explain the public can not influence the link road's alignment which according to the NPPF and Planning Policy Guidance is a means of clearly defining a Green Belt boundary. If this was the intention of planners and the organisers of the exhibition this is a serious breach of the public's trust in Central Bedfordshire Council as they have failed in their duty to inform and consult properly.

We note new land has been added to the Strategic Allocation, land around Vauxhall Parts Distribution Centre in Toddington Road for housing and or employment use. This additional allocation was also not part of either the Draft or the Pre Submission Development Strategy Documents and therefore could not have been included in the Transport or Employment studies put out for consultation.

The parcel of land for use as Minerals Railhead North of the Sundon Rail Freight Interchange is of concern to us as the road access to this area appears to be via the existing access track from Upper Sundon. This would present Upper & Lower Sundon residents with a major Heavy Goods Vehicle 'headache'. Also the Minerals Railhead represents a potential breach-point into the Green Belt in what the Framework Plan is supposed to be providing; a firm and permanent revision of the Green Belt ANOB boundary.

The parcel of Green Belt AONB land in Streatly Parish at the eastern end of the M1–A6 link road where it joins the A6 is of concern to us as the inclusion of this land within the Luton North Strategic Allocation yet outside the roadways alignment, will lead to pressure for further Green Belt AONB release, because it compromises the principle of the road as an absolute barrier to Luton's expansion.

An increase in traffic due to the planned use of land around the Vauxhall Parts Distribution Centre and its effects on traffic movement through Sundon Parish and across Houghton Regis and Luton is worrying. It is clear from S. 4.10 of the Framework Plan document that only some very high level work has been done to date, and *'additional transport evidence at a more refined level will be needed'* before the sustainability of the Luton North Strategic Allocation, or what would need to be done to make it sustainable, is properly established. This directly contradicts the Pre Submission Development Strategy Sustainability Appraisal that claims the plan is sustainable.

The key issue is to establish the combined traffic impacts of North Luton and North Houghton Regis Strategic Land Allocations. This work has not yet been done in any detail. It is our view this work should not be started until the traffic impact of Houghton Regis North is more clearly identified than it is now. These facts also support our view that the Framework Plan is premature and the timetable for development of these Strategic Allocations has become too closely compressed for the implications of their combined traffic impacts to be properly assessed.

The Sundon Rail freight Interchange is now not considered significant infrastructure as it is uncertain whether Network Rail will connect the proposed warehousing to the rail network. This change will affect the scale of operations at the site and thus have an adverse impact on the number of jobs this site is claimed to produce. This employment zone is in the Green Belt and the cessation of this designation is predicated and justified by Central Bedfordshire Council because it is supposed to provide an *'exceptional opportunity for development of a rail/road interchange and warehousing/distribution centre'*. The rail road interchange concept is completely esoteric. Even if the rail infrastructure is laid in there can be no guarantee that rail will play any significant role in activities there or any role at all because the use of rail is entirely determined by the market i.e. relative rail costs versus road costs and quality of service.

Within Sundon and Streatley Parishes Public Footpaths 12 and 4 that connect Upper and Lower Sundon, and Streatley with the North Luton Strategic Land Allocation cross the proposed M1-A6 roadway. It was confirmed by exhibition staff that these crossings will be via footbridges rather than underpasses. These bridges will be substantial structures with ramped access for the mobility-impaired, and probably fully enclosed too to prevent them becoming a safety hazard to road users from missiles. They will inevitably be significant, alien, and highly visible intrusions into the wider Chilterns AONB landscape.

Yours sincerely

Michael Stonnell

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