

Mr Birkinshaw & Mrs Hockenhull
C/O Ian Kemp PO Box 241
Droitwich
Worcestershire
WR9 1DW

Your ref: CBC Local Plan
Our ref: CBC LP 141019
Date: 14.10.19

Dear Mr Birkinshaw & Mrs Hockenhull,

Examination of the Central Bedfordshire Local Plan

Thank you for your letter, dated 30 September 2019, in relation to the Central Bedfordshire Local Plan.

It is unfortunate that the Council have been delayed in publishing the content of this letter, but as you are aware, we did feel it necessary to ensure we were in receipt of, and had time to consider, all information that informed it.

The letter refers to a communication the Council was not privy to, which you have now shared. During communications between us to resolve this issue, it then came to light that other correspondence had been received and not shared with the Council or made publicly available. Again, this has now been made available and has been published on the Council's examination webpages. The Council would like to make clear that it is fully committed to ensuring an open and transparent examination process, and that concerns have been raised with regard to the approach that has been taken.

We note the tone of the letter and its lack of clarity does not appear to be consistent with a desire to work proactively with the Council to progress this plan, which is not hugely helpful. However, bearing in mind we have now had time to process the content of the letter and its implications, the Council is comfortable that the plan can be progressed and that subject to the additional work it suggests being undertaken and, of course, main modifications, the plan is capable of being made sound.

We have considered the issues raised within the letter and we understand your concerns are as follows:

1. **Area A** – you raise concerns in relation to the ‘reasonable alternatives’ considered within the Sustainability Appraisal (SA) for Area A, including the capacities of land to the north and west of Luton.
2. **Employment sites** – we understand you have concerns in relation to the scenarios tested within the SA to cater for ‘footloose’ warehousing demand.
3. **Conflicts between the SA and the findings of other evidence studies** – you have raised these concerns in relation to Holme Farm (Policy SE3) and Marston Gate (Policy SE2).

The above issues (Points 1-3), very clearly relate to the SA methodology and its findings. As such, to resolve these issues, we intend to appoint a new independent consultant to review and revise the SA, particularly in relation to those issues raised above. This will require the publication and consultation of a revised piece of evidence to inform the plan.

4. **M1, J13** – we understand you have concerns around the potential outcomes of the modelling work currently being undertaken, including how it might allow for other options to become available.
5. **M1-A6 link road** – you have requested further information in relation to a post-hearing communication received from the Chiltern’s Conservation Board (now published as an Examination Document).
6. **Sundon RFI** – we understand you have concerns around the demonstration of Exceptional Circumstances required to alter the Green Belt boundary and whether alternative locations were adequately considered (via discussions with neighbouring authorities or within the evidence base).
7. **Harlington** – we understand you have concerns that neither the Green Belt Study, nor the SA, adequately assess either an enlarged site or a site with reduced residential capacity. You also raise concerns relating to access from Toddington Road.
8. **Hockliffe (SA24 – SA26)** – you state that the additional modelling work would require publication, consultation and examination. You raise concerns about the justification for Green Belt release and the basis for the site boundary, for SA24, based on the proposed reduced capacities.
9. **Marston Gate** – in addition to the SA point raised above (point 3), we understand you have concerns relating to harm that would be caused to the landscape character of the area.
10. **Former RAF base, Henlow** – we understand you accept the Council’s position that inclusion of the site is no longer justified but have concerns relating to the postponement of a decision on the future of this site, risking the site becoming vacant with no positive strategy for its future and the impact of this on MBDA albeit you acknowledge decisions in respect of this site is a matter for the Council and stakeholders rather than yourselves
11. **East of Arlesey** – we understand you are concerned that the growth proposed for Arlesey will result in over-development and coalescence with Fairfield.

- 12. Holme Farm** – in addition to the SA point above (point 3), we understand you have concerns relating to harm that would be caused to the landscape character of the area.
- 13. East of Biggleswade (Policy SA4)** – we understand you have concerns that this allocation as a standalone site has not been assessed within the SA. You also raise questions around access.
- 14. Aspley Guise** – you suggest the allocation should be deleted from the plan.
- 15. Barton-le-Clay** – you suggest that this site is not deliverable within the plan period.
- 16. Chalton** – you suggest the allocation should be deleted from the plan.

In response to the above issues (Points 4 to 16), and in addition to updating the SA, the Council intends to take the following actions:

- Respond to the specific questions raised in relation to the M1-A6 link road in the form of an update note
- Provide a technical paper on transport to address the M1, J13 concerns
- Provide a technical paper on employment to address concerns relating to Marston Gate, Holme Farm and Sundon RFI.
- Provide a technical paper on housing to address the points relating to Harlington, RAF Henlow, Hockliffe, East of Arlesey and East of Biggleswade.

We expect we will be able to address most of these points through the revision of the SA and by clarifying the findings of existing evidence. If, however, any additional/revised evidence is required, a summary of findings and resulting implications for the plan will be clearly set out within the relevant technical paper for each site affected.

We expect to complete this work and consultation on the further documentation by April 2020.

Following that, and if required, additional hearings can be held from June 2020. Following the submission of the plan, the Council requested under Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended) that the Inspectors recommend main modifications to make the plan sound and legally compliant. As such, those sites you have made clear should be removed from the plan can be dealt with via this method.

We are pleased that you referenced Mr Brokenshire's letter of 18 June and welcome the acknowledgement that progressing the plan forward is particularly important for Central Bedfordshire, as we currently do not have a single Local Plan in place. We welcome the opportunity to work with you to continue to do this.

The Council remains committed to adopting this Local Plan to deliver the growth required to meet Central Bedfordshire's needs, but also those unmet needs of Luton Borough Council, and will commit the resources required to deliver the additional work in a timely and efficient manner.

Yours Sincerely



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