

## Comments

### The Luton and southern Central Bedfordshire Pre-Submission Core Strategy (29/11/10 to 17/01/11)

Comment by	CPRE Hertfordshire (Mr K FitzGerald)
Comment ID	PS292
Response Date	17/01/11 10:56
Consultation Point	CP 8 Comment on Policy CS1, Development Strategy ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1

#### Section of the Plan

You are about to make a comment against this section. This will be sufficient for the Inspector to understand the context of your comment. You may however make reference to a specific paragraph, policy or Proposals Map amendment.

Would you like to refer to a specific paragraph, policy or proposals map amendment? Yes (not normally required)

As you have chosen to comment on a specific part of the Strategy you will need to tell us which of the following you are referring to: Policy (e.g., CS3)

#### Which specific part of the Strategy do you want to refer to?

- 1 To refer to a paragraph, type it's number like this: **4.2**
- 2 To refer to policy, only type it's reference number, e.g. **CS2**
- 3 To refer to a particular map please give it's full name, e.g. **Amendment 1.**
- 4 To refer to a Strategic Objective please give it's code, e.g. **SO2.**
- 5 To refer to a Vision statement please give it's title, e.g. **Luton Town Centre.**

Enter the reference here: CS 1

You have chosen that you do not believe the Plan is Sound.

Do you consider the Core Strategy is **unsound** because it is **not**:

#### Comment summary

Use this box if you would like to indicate your main comment(s) regarding this section. The use of bullet points is recommended.

In Policy CS 1, the Core Strategy proposes an extension eastwards of Century Park, the major employment area at the eastern end of Luton Airport. The extension would be sited within the Green Belt south of Wandon End in North Hertfordshire District. The Core Strategy Proposal Map Amendment A2 is shown as a 'Recommended Development Plan Alteration to North Hertfordshire District Council' and is referred to in Chapter 3, Development Strategy, in the section headed Urban Extensions, at paragraph 3.14. This paragraph states that the issue is discussed further in Chapter 10, but the relevant pages (153 and 154) make no comment on this proposal. The 'recommendation' is also included in paragraph 4.3.

Paragraph 5.9, Development in the Green Belt, also refers to this 'recommendation' in item 4, and paragraph 11.14 refers to it as 'the proposed direction of growth within North Hertfordshire to the east of London Luton Airport'. Policy CS 18 and Appendix A5 also refer to 'potential extension of Century Park'.

Whilst CPRE Hertfordshire notes and welcomes the exclusion from the Core Strategy of the previous major development proposals eastwards into North Hertfordshire, it notes that the extension of Century Park into the Green Belt is still proposed. CPRE Hertfordshire would normally strongly object to any such proposal that is intended to form part of the local development framework. In this case, however, we note that the recommendation to North Hertfordshire District Council (NHDC) in the Core Strategy could only be implemented through the yet to emerge North Hertfordshire Core Strategy (NHCS) or a planning application to NHDC.

The first stage of the NHCS is not likely to be published for consultation before mid-2011, at which time CPRE Hertfordshire will consider whether representations are necessary on any proposals relevant to the Luton and southern Central Bedfordshire Core Strategy (LsCBCS) recommendation. Pending adoption of the NHCS, CPRE Hertfordshire will expect NHDC to determine planning applications in accordance with current adopted local planning policies, and would vigorously oppose the implementation of the LsCBCS recommendation in advance of the adoption of the NHCS.

## Attendance at the Examination in Public

**If your representation is seeking a change to this section of the Plan would you consider it necessary to take part in the oral part of the examination?** No

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<b>Comment by</b>	CPRE Hertfordshire (Mr K FitzGerald)
<b>Comment ID</b>	PS324
<b>Response Date</b>	17/01/11 12:04
<b>Consultation Point</b>	CP 43 Comment on paragraphs 10.17 - 10.18 and Table 10.1, North of Luton SSSA Recommended Infrastructure Delivery ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.4

## Section of the Plan

**You are about to make a comment against this section. This will be sufficient for the Inspector to understand the context of your comment. You may however make reference to a specific paragraph, policy or Proposals Map amendment.**

**Would you like to refer to a specific paragraph, policy or proposals map amendment?** Yes (not normally required)

**As you have chosen to comment on a specific part of the Strategy you will need to tell us which of the following you are referring to:** Paragraph (e.g., 4.5)

**Which specific part of the Strategy do you want to refer to?**

- 1 To refer to a paragraph, type it's number like this: **4.2**
- 2 To refer to policy, only type it's reference number, e.g. **CS2**
- 3 To refer to a particular map please give it's full name, e.g. **Amendment 1.**
- 4 To refer to a Strategic Objective please give it's code, e.g. **SO2.**
- 5 To refer to a Vision statement please give it's title, e.g. **Luton Town Centre.**

**Enter the reference here:** Table 10.1

### Soundness

Please refer to the links below this form if you need guidance on this question.

**Do you consider this section is Sound?**

No

**You have chosen that you do not believe the Plan is Sound.**

**Do you consider** the Core Strategy is **unsound** because it is **not**:

. Justified

**Please give reasons for your support or objection in the box below**

You **must** provide details if you have ticked either of the above options regarding legal compliance or soundness.

Table 10.1 of the Core Strategy, in the section on 'North of Luton SSSA - Delivery and Monitoring', refers to a section of the Luton Northern Bypass between the A6 and the A505 to the north east of Luton, although no such link is shown on the Core Strategy Key Diagram.

CPRE Hertfordshire is concerned that the references to such a bypass are ambiguous, may lead to unnecessary uncertainty, and may be prejudicial to future decisions about the area through which such a link would have to pass, potentially including the Chilterns AONB in Hertfordshire.

This concern is because whilst paragraph 10.16 refers to the Luton Northern Bypass 'in the longer term', Table 10.1 says '**Commencement** (my emphasis) of A6 to A505 section (of this bypass) in the longer term'. In the first case 'longer term' appears to relate to later in the strategy period, but if this applies in both cases, the A6 to A505 link should be set out as a specific proposal. CPRE Hertfordshire would strongly resist any such route that adversely affected the Chilterns AONB in Hertfordshire.

In the event, however, that the Councils intended to refer in Table 10.1 to 'longer term' as being beyond the period of the Core Strategy, the reference to an A6 to A505 link should be completely removed from the Core Strategy, including from Table 10.1, as it does not form part of the Development Plan.

### Changes

Please set out what change(s) you believe necessary to make this section legally compliant or sound. If you are questioning the section's soundness then you will have to explain this in relation to the test of soundness you have identified above.

We will also need to know why you believe this change will make this section of the Core Strategy legally compliant or sound. It will be helpful if you are able to suggest revised wording of any policy or text.

References to a link between A6 and A505 north-east of Luton should be removed from Table 10.1, for the reasons set out above

### **Comment summary**

**Use this box if you would like to indicate your main comment(s) regarding this section. The use of bullet points is recommended.**

Please see comments set out above

### **Attendance at the Examination in Public**

**If your representation is seeking a change to this section of the Plan would you consider it necessary to take part in the oral part of the examination?** No