

HERTFORDSHIRE COUNTY COUNCIL

**CABINET
MONDAY 13 OCTOBER 2003 AT 2.00 P.M.**

Agenda Item No

7

SUB REGIONAL PLANNING: MILTON KEYNES & SOUTH MIDLANDS SUB-REGIONAL STRATEGY - consultation draft, July 2003

Report of the Director of Environment

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Local Members: Nigel Brook, Derrick Ashley and David Billing.

1. Purpose of the report

- 1.1 To inform Cabinet of the publication of the draft Milton Keynes and South Midlands Sub-Regional Strategy, with particular reference to the growth location of Luton, Dunstable and Houghton Regis, and agree an appropriate response.

2. Summary

- 2.1 The draft Milton Keynes and South Midlands (MKSM) Sub-Regional Strategy has been published for consultation. The draft Strategy performs the role of proposed Alterations to Regional Planning Guidance covering the East of England (RSS14 in preparation), the East Midlands (RPG8) and the South East (RPG9). All responses will be considered and selected respondents will be invited to take part in the Public Examination, which will take place in February 2004.
- 2.2 The draft Sub Regional Strategy covers the sub areas of Bedfordshire and Luton, Milton Keynes and Aylesbury Vale and Northamptonshire and seeks to provide a long-term spatial vision for each sub area up to 2031. The consultation draft comprises an over-arching strategy for the whole of the sub region (Part A) and the three separate statements of strategy provide specific guidance for each of the Sub-Areas (Part B). In Part B guidance is provided on the scale, location and timing of development, associated transport, employment and social infrastructure, and the delivery mechanisms needed to meet the Government's vision of sustainable communities.

- 2.3 The level of housing and economic growth judged as realisable in the study for Bedfordshire and Luton over the 30 year period to 2031 is up to 97,000 dwellings and 53,000 jobs. In relation to Luton, Dunstable and Houghton Regis this equates to approximately 20,600 dwellings and 11,562 jobs by 2021. A site within Hertfordshire, lying outside of the study period has been identified as a reserve site for development, if needed, in the period up to 2021. This reserve site is some 95 ha of mainly agricultural land, including the settlements of Cockernhoe and part of Mangrove Green, at the eastern side of Luton.
- 2.4 The Part B Statement shows the indicative location of this site as a red star in figure 1, see appendix A. The growth area assessment undertaken by Roger Tym & Partners suggests a shortfall to 2021 of some 15,800 dwellings in Luton, Dunstable and Houghton Regis against current supply. It is estimated that 554 ha will be required to accommodate this shortfall and that due to a lack of development opportunities within Luton Borough, a significant proportion of growth identified for Luton will need to be met outside of Luton's administrative area within South Bedfordshire and possibly North Hertfordshire.
- 2.5 The Structure Plan and Regional Issues Panel will consider this report on 6 October and their views will be reported to Cabinet.

3. Conclusions

- 3.1 A number of suggested comments that Cabinet may wish to make on the draft Milton Keynes and South Midlands Sub-Regional Strategy are discussed in sections 2 and 3 of this report. The main points, which may be included in the County Council's response, could cover the following.
- 3.2 A spatial strategy for the sub region that pursues urban renaissance objectives is welcomed, however a spatial strategy which relies heavily on urban extensions will undermine efforts to regenerate the existing built up areas of the sub region, including Luton.
- 3.3 The principle of identifying land within north Hertfordshire, outside of the sub regional boundary is strongly objected to. The spatial strategy makes no direct reference to Hertfordshire, therefore it is debatable how a site in Hertfordshire can be identified. This calls into question whether the Public Examination into the Alterations can consider the option of possible development in Hertfordshire.
- 3.4 There has been no re-evaluation of the assumptions behind the preferred spatial strategy in the original MKSM study in the light of the separate growth assessments.
- 3.5 The identification of the north Hertfordshire site is further objected to on the grounds that is not a favourable site in both sustainability and accessibility

terms, nor when compared to the other and more suitable sites identified in the study.

- 3.6 Significantly the north Hertfordshire site has not been justified in terms of need. Its inclusion as a reserve site is based solely on meeting any possible shortfall in the growth strategy arising from phasing and infrastructure constraints throughout the 20 year period. The major uncertainty inherent in the growth strategy surrounds the three northern sites, which are dependent on the widening of the M1 and the completion of the northern bypasses. The inclusion of the north Hertfordshire site as a safety net to the spatial strategy is therefore objected to. This is not a robust technical argument and reflects instead the need for further technical work to refine and strengthen the growth strategy.
- 3.7 It is crucial that future growth in the sub region does not adversely compromise the benefits sought by widening the M1 and other key infrastructure schemes, many of which are designed to address existing capacity. Further there is concern that the preferred spatial strategy shows the indicative line of the eastern airport bypass as proposed in SERAS. This proposal has no status as it would only be required in the event of significant increases in capacity at Luton Airport, and that beyond the scale envisaged in the growth strategy. As such the eastern airport bypass has no value in improving the accessibility of the north Hertfordshire site.
- 3.8 There is concern over the environmental implications of implementing a northern bypass and particularly the traffic implications for Hitchin from improving east west links. Further it is not clear from the consultation document the justification for the proposed highway improvement to the A1081 and the Translink extension to the south east of Luton, see appendix a. These infrastructure improvements appear unrelated to the growth strategy, which seeks to capture opportunities for employment development in Luton town centre and near the airport.
- 3.9 The County Council requests a seat at the Public Examination into the Alterations and requests full involvement in all future consultation/delivery stages of the Sub Regional Study, particularly those relating to the establishment of a Local Delivery Vehicle for Luton/Dunstable/Houghton Regis.

1. Background

- 1.1 Regional Planning for the South East (RPG9) identifies the general area of Milton Keynes and the South Midlands (MKSM) as one of four potential major growth areas in the wider South East. RPG9 proposed undertaking a sub regional study to investigate what the nature, possible extent and location of future growth might be within the MKSM area.
- 1.2 The MKSM Study was commissioned¹ in July 2001. The growth sub areas in question cover Bedfordshire and Luton, Milton Keynes and Aylesbury Vale and Northamptonshire. The final report, published in September 2002, concluded that the study area has considerable potential for sustainable economic growth over the next 30 years that will be of benefit locally and nationally. Further that the preferred option would focus growth on the settlements of Northampton, Milton Keynes, Bedford, Luton/Dunstable/Houghton Regis and Kettering/Wellingborough/Corby. Given the study area straddled the three counties of Buckinghamshire, Bedfordshire and Northamptonshire and not Hertfordshire, the County Council, whilst aware of the study, was not involved in it.
- 1.3 Following the findings of the original study, consultants carried out growth area assessments for each location mentioned above. The remit of these individual assessments was to test the proposals of the original MKSM Study and recommend modified housing figures for the proposed growth areas in the sub-region. The consultation document says that this analysis has been carried forward into the draft Sub Regional Strategy.
- 1.4 The draft Sub Regional Strategy seeks to provide a long term spatial vision for the Sub Region up to 2031. The consultation draft comprises an over-arching strategy for the whole of the sub region (Part A) and the three separate statements of strategy provide specific guidance for each of the Sub-Areas (Part B). In Part B guidance is provided on the scale, location and timing of development, associated transport, employment and social infrastructure, and the delivery mechanisms needed to meet the Government's vision of sustainable communities.
- 1.5 The draft Sub Regional Strategy outlines six growth aspirations for the sub region covering:
 - i. Gaining significant economic and investment benefit through operating in a more cohesive way across the Sub-Region;
 - ii. Concentrating growth at the main urban areas in the sub-region where urban renaissance can be achieved and regeneration needs tackled;
 - iii. Building up east-west communications to balance those that are north-south;
 - iv. Ensuring that growth goes hand in hand with well-designed development, an enhanced environment, improved infrastructure and

¹ By the Government, the three Regional Planning Bodies and the Regional Development Agencies for the South East, East of England and the East Midlands.

- with a step change in both affordable housing and in public transport provision that links together the Sub-Region;
- v. Developing higher value employment and skills across the Sub-Region to maximise prosperity;
 - vi. Establishing the mechanisms and providing the resources to ensure that the necessary investment for infrastructure and services are in place to facilitate sustainable growth.
- 1.6 The draft Sub Regional Strategy performs the role of proposed Alterations to Regional Planning Guidance covering the East of England (RSS14 in preparation), the East Midlands (RPG8) and the South East (RPG9). It will, as part of the RPG/RSS, drive the preparation of Local Development Documents (LDDs) and Local Transport Plans across the Sub Region. In addition it will also drive the preparation of community strategies and identify the priorities for investment and economic strategies by the public, private and voluntary sectors.
- 1.7 The Government's Sustainable Communities Plan (February 2003) sets the wider context for the Alterations, that is, accommodating the economic success of London and the wider South East and ensuring that the international competitiveness of the region is sustained for the benefit of the region and the whole country.
- 1.8 The Structure Plan and Regional Issues Panel will consider this report on 6 October and their views will be reported to Cabinet.

2. Part A Statement

Section 1: The Spatial Framework

- 2.1 The Part A Statement sets out the overarching Strategy for the whole of the Sub-Region. Section 1 contains two strategic policies. Policy 1- *the spatial framework* states that growth should be concentrated at the six key locations in the sub-region, including Luton/Dunstable/Houghton Regis, where urban renaissance can be achieved and regeneration needs tackled. Within the Luton/Dunstable/Houghton Regis growth area 20,600 dwellings by 2021 have been identified. The draft explains that this area:

'should build itself into a vibrant, culturally diversified urban location with a step change improvement in its local economy and skills base. This should be achieved through economic regeneration across the urban area, optimising its strategic location close to London and the South East and the proximity of an international airport'. (page 10).

- 2.2 Policy 2 - *the strategic communications infrastructure*, seeks to develop better east-west communications to balance existing north-south communications. The growth area aspirations for the sub region require significant infrastructure investment. The draft Sub Regional Strategy considers that investment priorities should concentrate on improving east-west links, with improvements

to north-south connections more focused on improving strategic public transport and on addressing acute road congestion. In respect of Luton this would include the enhancement of the Thameslink 2000 (London-Bedford), the Midland Main Line Upgrades, rail line re-opening of MML to Corby and beyond and M1 widening (M25 to M6).

Issues Arising

- 2.3 Notably objective two for the sub region seeks to concentrate growth at the main urban areas where urban renaissance can be achieved and regeneration needs tackled. The spatial strategy reflects this objective, particularly the need to make more effective use of previously developed land and buildings, and this is welcomed. Likewise a strategy that has emphasised the need to regenerate Luton, Dunstable and Houghton Regis, both physically and economically is welcomed.
- 2.4 However the spatial strategy appears equally reliant on sustainable green field extensions to achieve the growth aspirations for the sub region. This is particularly the case for Luton, Dunstable and Houghton Regis. Although the growth assessments may justify the need for sustainable urban extensions, there is the danger that a spatial strategy that is reliant on green field urban extensions could if poorly managed and phased, undermine efforts to encourage a renaissance within the large urban areas of the region.
- 2.5 Appropriate phasing and implementation mechanisms for the sub region would be crucial to ensuring that this would not happen. However it is important that the spatial strategy – strategic policy 1, includes words to the effect that development within the sub region should follow the sequential approach by focussing first on sites within existing urban areas or on land already committed for development.
- 2.6 Of particular concern the spatial strategy makes no direct reference to Hertfordshire and clearly the issue arises how a site within Hertfordshire can be identified when Hertfordshire was not part of the original MKSM study. This calls into question whether the Public Examination into the Alterations can consider the option of possible development within Hertfordshire.
- 2.7 Notably there is no evidence that there has been a re-evaluation of the assumptions behind the preferred spatial strategy in the original MKSM study. For each growth area, consultants were commissioned to test the feasibility and timing of growth that would be appropriate. The sub area of Bedfordshire and Luton was broken down into the growth areas of Bedford/Kempston/northern part of the Marston Vale and Luton/Dunstable/Houghton Regis and each were taken forward by ENTEC and Roger Tym & Partners respectively.
- 2.8 In the original MKSM study the preferred spatial strategy for Luton/Dunstable/Houghton Regis amounted to 31,000 dwellings to 2031. This took the 'higher growth' figures rather than the 'at trend'. Roger Tym & Partners took 60 per cent of the 30 year higher growth target (31,000) to reach

a figure for 2021, saying it reflected the aspirations of local stakeholders and a view of an enhanced economic potential. On this basis the requirement for growth is up to 20,600 additional dwellings.

- 2.9 However the results of these and the other growth area assessments have not in any transparent or meaningful way come together to test the feasibility of the original MKSM study. Assumptions behind the preferred spatial strategy of high growth should be revisited on the basis of fuller information arising from these more detailed studies. For example, the proposed spatial strategy for Luton/Houghton Regis requires the delivery of transport infrastructure before major green field land releases. Difficulties already envisaged in bringing forward these schemes pose a major constraint, which in turn will have a severe impact on the deliverability of the spatial strategy. However, within other parts of the sub region growth constraints at least in the short term may not be so severe.
- 2.10 There is some confusion over the period being planned for. In the original MKSM study the plan period was 2031. However the spatial framework for the sub area of Bedfordshire and Luton covers the period to 2021, therefore it is unclear how a growth strategy might develop beyond 2021 and how this 'gap' will be filled.
- 2.11 In relation to the infrastructure requirements of the sub regional strategy, it is vital that the growth needs of the sub region are managed, particularly in terms of the impact of additional out-commuting on the future/ improved capacity of the road and rail network. The M1 for example is already one of the most congested roads in the country and plans to widen sections of the M1 seek to increase its capacity to tackle severe existing congestion issues. Therefore it is crucial that future growth in the sub region does not adversely compromise the benefits sought by widening the M1 and other key schemes.

Section 2: Sustainable Communities

- 2.12 The draft Sub Regional Strategy stresses that it is important to create balanced communities that both contribute to the existing character of the Sub Region and enhance it. The draft lists a numbers of key requirements, including a flourishing local economy, good public transport, good quality local services and a sense of place. However the draft recognises that these requirements are largely dealt with in national and regional guidance. Instead strategic policy 3: *sustainable communities* concentrates on two areas, which are regarded as being in need of a greater sub regional focus. They are a 'flourishing economy' and 'community infrastructure'.
- 2.13 Identified growth sectors are promoted to ensure continued economic growth, these sectors are high performance automotive, creative industries, food and drink, freight and logistics, knowledge industries, healthcare and tourism. In relation to community infrastructure particular emphasis has been placed on education and training, healthcare and community facilities. The draft explains that detailed evaluation of these issues will be necessary by service providers.

Issues Arising

- 2.14 The overarching policy objective to build sustainable communities is welcomed. With regard to the issue of promoting a flourishing economy, paragraph 2.9 says:

'although other parts of the sub-region appear to have a more than adequate supply of land for employment uses, all local planning authorities should appraise the quality of employment land to ensure that allocations are of sufficient quality to meet market expectations in relation to the demands of the growth sectors'.

- 2.15 Whilst recognising the need for economic growth, within Luton an over supply of employment land has been identified, which could be recycled for other uses, including housing, to meet the regeneration aspirations of the town. It is disappointing that the draft Sub Regional Strategy does not explicitly recognise the possibility of recycling employment land in line with guidance in Planning Policy Guidance Note 3: Housing (PPG3) which encourages local planning authorities when reviewing their development plan to consider whether land currently allocated for employment, and other uses, might be better used for housing or mixed-use development. The Government has commented that despite this encouragement many authorities continue to reserve an excess supply of employment land when it would make sense to consider this for housing.
- 2.16 The recent consultation paper on proposed changes to PPG3 includes a requirement for the reuse of employment land for housing unless a convincing case for retention can be made. The argument that the surplus employment land of within Luton is needed solely for employment uses has not been justified and needs to be resolved as it has a direct bearing on the need to release green field peripheral sites, including the reserve North Hertfordshire site.

Section 3: Effective Delivery

- 2.17 Strategic Policy 4 – *effective delivery*, proposes mechanisms for the delivery of the Sub Regional Strategy. These mechanisms cover:
- The establishment of a Sub Regional Management Board.
 - Establishment of Local Delivery Vehicles (LDVs) covering all of the growth locations by the end of 2003.
 - Preparation of Strategic Implementation Plans by each Local Delivery Vehicle by the end of 2004.
 - The early preparation of Local Development Document (LDD) Core Strategies supported by Area Action Plans for areas of change, with deposit periods no later than early 2005.
 - Production of sub-regional implementation and guidance documents.
 - Working with the Government to develop a long-term strategy to secure the physical and community infrastructure and services needed to achieve the Sustainable Communities objectives.

- 2.18 The draft Sub Regional Strategy explains that progress would be monitored regularly and reported in an Annual Sub-Regional Implementation Statement prepared by the Sub Regional Management Board. Further an implementation schedule for each sub area is included in the Part B Statements. This will need to be reflected in the LDDs and LDV Strategic Implementation Plans.

Issues Arising

- 2.19 The implementation mechanisms proposed raise the obvious concern over their local democratic accountability and particularly how Hertfordshire can be tied into this process when the original MKSM study did not extend into Hertfordshire.
- 2.20 At this point in time there are no clear suggestions about the form of a Local Delivery Vehicle (LDV). Obvious examples are Urban Development Corporations and the more recently established Urban Regeneration Companies. A brief is currently being prepared to commission a consultant to assess the options for a LDV. The County Council and North Hertfordshire District Council are involved in commissioning this work.

3. Part B Statement for Bedfordshire and Luton (East of England)

- 3.1 The Part B statement provides detailed and concise guidance focused on implementation. This will guide strategic and operational plans of delivery agencies and the preparation of LDDs and other policy documents such as Local Transport Plans, etc.
- 3.2 Luton/Dunstable/Houghton Regis has been identified as a key regional centre. The growth area assessment undertaken by Roger Tym & Partners found that there is insufficient residential land to meet the development levels proposed in the Growth Area Study. Further in the case of employment land, it was found that employment supply exceeds requirements. The draft says:

‘Careful assessment of what potential exists to use some of this land to meet the residential shortfall is required. There may, however, be a case on qualitative grounds for the need for further releases of employment land to meet the requirements of modern businesses’.

- 3.3 Notably the draft says that wherever possible the existing manufacturing bases of the two areas should be protected and strengthened. The draft notes that key employment opportunities exist at London Luton Airport and the former Vauxhall Car Plant to assist with economic regeneration, forming part of an employment cluster to the south of Luton town centre. The document says that further progress should be made to optimise previously-developed land and buildings for increased housing and mixed use developments, improve the quality of development, maintain and improve the environment, improve town centre safety and security, and to minimise greenfield land release.

- 3.4 It is proposed that development will follow the sequential approach by focusing on sites within the existing urban area or on land already committed to development. Further development sites will be identified through rigorous sustainability criteria. The draft says:

'The expected levels of growth will ultimately mean that urban extensions will be necessary to accommodate development towards the end of the Plan period. The broad locations for the urban extensions are..... and north of Luton/Dunstable/Houghton Regis and west of Dunstable. The latter two will require revisions to the South Bedfordshire Green Belt boundary. In addition it may be necessary to accommodate some growth in North Hertfordshire as an urban extension to the East of Luton.'

- 3.5 Policy 1 sets out the proposed dwelling provision for Luton/Dunstable/Houghton Regis over the periods 2001-2011 and 2011-2021. Some 10,272 dwellings are proposed for each period, equating to a total of 20,544 dwellings. A footnote to this policy says:

'The Roger Tym Growth Area Assessment suggests a shortfall to 2021 of some 15,800 dwellings in the Luton/Dunstable/Houghton Regis sub area against current supply. It estimates that 554ha will be required to accommodate this shortfall. It should be noted that due to the lack of development opportunities within Luton Borough, a significant proportion of growth identified for Luton will need to be met outside of Luton's administrative area within South Bedfordshire and possibly North Hertfordshire. Further work is necessary to determine the exact scale and phasing of development to meet the overall Growth Area requirements. No northwards expansion is, however possible until the M1 widening and northern bypasses are completed.'

- 3.6 The Hertfordshire site in question is some 95ha of largely agricultural land, including the settlements of Cockernhoe and part of Mangrove Green, at the eastern edge of Luton. Figure 1, appendix A shows the preferred spatial strategy for Luton, Dunstable and Houghton Regis and shows the Hertfordshire site by way of a red star as a key reserve site.

- 3.7 This last section of the Part 2 Statement covers the supporting infrastructure needed to bring about an urban renaissance and covers affordable housing, utilities and transportation. With regard to implementation issues the draft Sub Regional Strategy considers the need for a new Local Delivery Mechanism to lead and facilitate development. It goes on to say that it may be necessary for different forms of LDV to be devised to meet the specific requirements of each growth areas.

Issues Arising

- 3.8 The Part B Statement has been informed by the growth area assessment for Luton, Dunstable and Houghton Regis, undertaken by Roger Tym & Partners and completed in May 2003. Much detailed information is missing in the Part B Statement and the issues and concerns from a Hertfordshire perspective have been drawn by referring back to the consultant's final report. As already

mentioned, the MKSM study did not cover Hertfordshire, indeed the spatial vision, figure 2 of the consultation document shows Hertfordshire outside of the sub regional boundary. This brings into question how the sub regional strategy can identify a reserve site in Hertfordshire. In addition to this fundamental concern, the identification of the north Hertfordshire site is objected to on the following grounds:

- a) the identification of the north Hertfordshire site has not been justified in sustainability or accessibility terms.
- 3.9 The north Hertfordshire site is some 95 ha of largely agricultural land, including the settlements of Cockernhoe and part of Mangrove Green, at the eastern edge of the built-up area of Luton. Visually, development at this location would result in the loss of attractive, well cared for Green Belt countryside and would result in the coalescence of Luton with the two settlements mentioned above. It could have a visual impact over a wider area, depending on the scale and nature of the development proposed, including an impact from Lilley Bottom valley. Further an initial search by the Hertfordshire Biological Records Centre indicates that the development of this area could impact on four non-statutory sites of importance for wildlife.
- 3.10 This site is close to Luton Airport noise contours and is not easily accessible to Luton town centre and in turn to the employment sites to the north and south of Luton. For this reason alone this location has no physical relationship whatsoever with the existing urban form of eastern Luton. Although the possibility of an airport bypass extending south and east of this site might provide better access, this proposal, raised in SERAS, would only be required in the event of significant increases in capacity at Luton Airport, and that beyond the scale envisaged in the growth strategy. Overall there would need to be a strong justification for development of this site to overcome the issues above. Significantly the sustainability stage 2 appraisal undertaken by Roger Tym and Partners reinforces the argument that the north Hertfordshire site does not fair favourably in sustainability and accessibility terms.
- b) there is uncertainty over the amount of recyclable employment land within Luton Borough, therefore the identification of a reserve site within Hertfordshire is premature.
- 3.11 The consultants are of the view that there is a surplus of employment land. A rigorous assessment of employment land need in Luton Borough is required as a matter of priority. However, at this juncture, and until justified otherwise, this surplus employment land should be regarded as the 'reserve' needed to meet the shortfall in the growth strategy and not a site outside of the study area which is not favourable in sustainability and accessibility terms. Therefore the identification of the north Hertfordshire site is premature and reflective of a study which in methodological terms whilst sound, was rushed through when further technical work was necessary to inform a more robust growth strategy.

- c) The justification for the inclusion of a reserve site is based solely on the need for flexibility within the spatial strategy, which is founded on high levels of uncertainty.
- 3.12 Already it is anticipated that there will be time lags regarding the delivery of infrastructure provision, namely the M1 widening and northern bypasses. Delays will in turn impact on the phasing strategy, particularly with regard to the three northern green field sites (west Dunstable) which are dependent on these schemes coming forward. In addition the consultants highlight an additional uncertainty regarding the total amount of housing within the South Bedfordshire target, to be provided within Dunstable and Houghton Regis. On this point there is still no agreed view on how much growth should be assigned to South Bedfordshire.
- 3.13 Therefore inherent in the growth strategy is uncertainty. The identification of a reserve site within north Hertfordshire has been justified solely on the grounds of meeting any possible shortfall in the growth strategy arising from phasing and infrastructure constraints. The rationale for its inclusion is therefore based on the need for flexibility within the spatial strategy and not on the sustainability and accessibility merits of the site.
- d) Late involvement of the County Council in the process
- 3.14 The County Council became involved in the study very late in the day and only when it came to light that the consultant's area of search extended over the border to Hertfordshire. This however was only made known just before the penultimate meeting of the project group. In the consultant's interim report it was proposed that the north Hertfordshire site would not be needed until at least 2021. However subsequently the final report was amended to include the north Hertfordshire site as a reserve site up to 2021. Not only has the process been driven by a very tight timescale, it has also not been an open and transparent process. The County Council should have been involved much earlier in the process.

Infrastructure Issues

- 3.15 In relation to infrastructure issues, figure 1, the preferred spatial strategy, (see appendix A) shows the indicative line of the eastern airport bypass as proposed in SERAS. This proposal has no status as it would only be required in the event of significant increases in capacity at Luton Airport, and that beyond the scale envisaged in the growth strategy. As such the eastern airport bypass has no value in improving the accessibility of the north Hertfordshire site. Further the Luton East Circular proposals would provide adequate road capacity to meet the future needs of the airport, which raises doubt over the need for an eastern airport bypass in the first place.
- 3.16 The spatial strategy does not appear to have made the link that transport solutions and improvements will have implications beyond the study area. This will inevitably arise when the strategic highway schemes and locations begin to come forward.

- 3.17 With regard to the Luton Northern by-pass between the A6 and the A505, it is recognised that the growth strategy is reliant on the need to tackle traffic congestion in Luton, Dunstable and Houghton Regis from through traffic, so paving the way for regeneration initiatives. This approach is not disputed. However, there is concern over the environmental implications of implementing a northern bypass and significantly there is concern that improving east west links will have traffic implications for Hitchin. The town already experiences severe traffic problems, namely traffic bottlenecks and any northern bypass at Luton would only exacerbate this existing traffic problem.
- 3.18 It is not clear from the consultation document the justification for the potential highway improvements and translink improvements to the south east of Luton. These are shown on figure 1 in appendix A. They appear unrelated to the growth strategy, which seeks to capture opportunities for employment development in the town centre and near the airport.
- 3.19 The proposal to improve public transport linkages is welcomed, namely the identification of a Luton to Stevenage bus corridor. Further information is needed on how this would be taken forward in practice, particularly whether these improvements would provide a link to Luton Airport and Luton town centre and therefore provide an attractive alternative to the car.

4. Conclusions

- 4.1 A spatial strategy for the sub region that pursues urban renaissance objectives is welcomed, however there is concern that a spatial strategy which relies heavily on urban extensions will undermine efforts to regenerate the existing built up areas of the sub region, including Luton. In relation to Luton/Dunstable/ Houghton Regis, the phasing strategy brings forward the first tranche of greenfield urban extensions (west Dunstable) in the period 2006-2011. It is debatable whether this would allow enough time for a comprehensive regeneration strategy and implementation plan to be established for this growth location.
- 4.2 The principle of identifying land within North Hertfordshire, outside of the sub regional boundary is strongly objected to. The spatial strategy makes no direct reference to Hertfordshire, therefore it is debatable how a site in Hertfordshire can be identified. This calls into question whether the Public Examination into the Alterations can consider the option of possible development in Hertfordshire.
- 4.3 There has been no re-evaluation of the assumptions behind the preferred spatial strategy in the original MKSM study in the light of the separate growth assessments.
- 4.4 The identification of the north Hertfordshire site has not been justified in sustainability and accessibility terms and its inclusion as a reserve site is based solely on meeting any possible shortfall in the growth strategy arising

from phasing and infrastructure constraints. This is not a robust technical argument and is reflective of a process that has been rushed through to meet a tight timescale. Clearly further technical work is needed to refine and strengthen the growth strategy. A case in point is the surplus employment land found by the consultants. Only when this surplus is found to be incorrect should a reserve site be identified.

- 4.5 It is crucial that future growth in the sub region does not adversely compromise the benefits sought by widening the M1 and other key infrastructure schemes, many of which are designed to address existing capacity. Further there is concern that the preferred spatial strategy shows the indicative line of the eastern airport bypass as proposed in SERAS. This proposal has no status as it would only be required in the event of significant increases in capacity at Luton Airport, and that beyond the scale envisaged in the growth strategy. As such the eastern airport bypass has no value in improving the accessibility of the north Hertfordshire site.
- 4.6 There is concern over the environmental implications of implementing a northern bypass and particularly the traffic implications for Hitchin from improving east west links. Further is not clear from the consultation document the justification for the potential highway improvements and translink improvements to the south east of Luton.
- 4.7 The County Council should request a seat at the Public Examination into the Alterations and request full involvement in all future consultation/delivery stages of the Sub Regional Study, particularly those relating to the establishment of a Local Delivery Vehicle for Luton/Dunstable/Houghton Regis.

5. Financial Implications

- 5.1 There are none arising directly from this report but if the County Council is afforded the opportunity to put its case at the Public Examination, this will have financial implications.

Background Information

Consultation Draft, Milton Keynes & South Midlands Sub-Regional Strategy, July 2003

Luton/Dunstable/Houghton Regis Growth Area Study, Final Report, May 2003

Consultation Paper on a Proposed Change to Planning Policy Guidance Note 3: Housing – Supporting the Delivery of Housing, July 2003

Appendix a

Figure 1: Preferred Spatial Strategy for Luton, Dunstable and Houghton Regis



N.B All site boundaries and road alignments are purely indicative

