

## **CB/19/00887/FULL – M1-A6 Link Road, North of Luton**

### **Chiltern Society Comments**

The Chiltern Society objects to this proposal as we consider that it would have a damaging impact on the Chilterns Area of Outstanding Natural Beauty (AONB), the setting of the AONB and the Green Belt.

In relation to the AONB, the Society fully endorses the comments made by the Chilterns Conservation Board and will not repeat them again here.

The Society is concerned that the application is premature as it has been submitted ahead of the public examination of the Central Bedfordshire Local Plan, which will consider both the new link road and the adjacent allocation of land for 4000 houses and 20ha of employment land. We would expect that a decision on this is delayed until the examination has been completed and the inspectors' report received. We will be attending the examination to raise objections in relation to landscape impacts on the AONB and the loss of open countryside within the Green Belt.

In addressing impacts on the AONB, the Council is required under Section 85 of the CROW Act 2000 to conserve and enhance the natural beauty of the AONB, and under the NPPF paragraph 172 to give great weight to conserving and enhancing landscape and natural beauty in the AONB. It is not clear from the applications that these duties have been fully addressed.

The application is clearly major development in an AONB and, therefore, the tests in paragraph 172 of the NPPF should be applied. We consider that exceptional circumstances do not exist for allowing development in the AONB. The benefits of the scheme, do not in our view, outweigh harm to the landscape of the AONB, particularly where there are likely to be alternatives outside the AONB boundary.

It is not, in our view, in the public interest to cause harm to the AONB in this location, which is so close to the urban area of Luton and available for quiet recreation. Increased noise and poor air quality would further add to the harm.

In terms of need, it is unclear why this road is required in addition to the Oxford-Cambridge Expressway, which would be located well outside the AONB. With no decision yet made on the housing allocation, it is possible that it will not be needed there either. There is the option of a smaller, more local road located within the development. In any case, the emphasis of any housing development should be on improving links to Luton by sustainable means rather than encourage residents to drive further outside the local area.

The Expressway and the more local road provide clear alternatives that need to be fully considered. There is also the possibility of locating the road further to the south depending on the decision of the housing allocation.

Whilst there may be some scope for landscape mitigation, the overall scheme will cause harm to the landscape, as well as impacting on air quality, tranquillity and recreational use of the area.

The area where there would be particular impacts would be around Sundon and on the Warden and Galley Hills. It is not clear from the application that these could be mitigated successfully.

The building of a new road would be likely to increase traffic through the Chilterns to link in with the new road. It could also lead to an increase in lighting which would cause a nuisance to local residents as well as potentially protected species, such as bats.

In conclusion, the new link road, either on its own or cumulatively with the housing development, would have a significant negative impact on part of the AONB, the setting of the AONB and the Green Belt. The impact on the Chilterns would be unacceptable and, as there are alternatives available, other options should be considered. Therefore, we recommend that the application is refused.