

## **Sites EL1, EL2, EL3: East of Luton**

### **Policy SP5: Green Belt**

This proposal would destroy a large amount of North Hertfordshire's Green Belt land, including large swathes of prime countryside which is designated of special significant landscape value. Government policy on Green Belt land is completely ignored in this proposal. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Policy SP5: Countryside and Green Belt states that NHDC supports the principles of the Green Belt and recognise the intrinsic value of the countryside. The East of Luton proposal for 2100 dwellings does not adhere to this policy.

In March and October 2014, the Government updated its online Planning Practice guidance on the policies in the NPPF. This specifically states that "unmet housing need in a particular area is unlikely to meet the "very special circumstances" test to justify Green Belt development." It also confirms that local authorities have the ability to "safeguard their local area against urban sprawl and protect the green lungs around towns and cities". If this large scale development went ahead it would be directly contrary to the NPPF. The gap between urban Luton and rural North Hertfordshire would be lost and the villages of Mangrove, Cockernhoe and Tea Green would lose their individual identity. The government has said that it wanted to make planning policy clear that housing need does not justify the harm done to the Green Belt by inappropriate development.

In addition, the Government recently re-stated this position in a letter from Brandon Lewis, Minister of State for Housing and Planning to Members of Parliament on 7 June 2016 emphasising the very special circumstances and stating: "We have been repeatedly clear that demand for housing alone will not change Green belt boundaries.

At a meeting in Westminster this year with our local County Councillor, David Barnard, Brandon Lewis MP confirmed that "providing sites to accommodate neighbouring authorities unmet housing need does not constitute very special circumstances to roll back the Green Belt."

We believe that the evidence above proves that this development does not meet the "very special circumstances" test and would seriously harm this high quality area of Green Belt.

### **Policy SP5: Unmet Housing Need**

North Hertfordshire District Council seem intent on allowing their land to be used for building a large number of houses for Luton's unmet housing need, but there is evidence available which clearly indicates that they are not required. (Please see extract from minutes of NHDC meeting on 20/7/16, uploaded with this response)

A recent outline planning application for 660 houses from this allocation attracted a lot of opposition from Luton residents (see outline application: 16/02014/1 on NHDC planning website)

There are alternative areas for Luton's housing need to the west of the town where there are several sites available for development. When Councillor Chapman of Luton Borough Council spoke at the NHDC Council meeting on 20 July 2016, he considered that should there be further development, most Luton residents would prefer this to be to the west of the town towards the M1 motorway, where access would be easy, without the potential chaos that any development east of Luton would cause. The Bushwood Site which has capacity for 5500 dwellings is to the west of the town, close to existing public transport infrastructure and the guided busway route, and sufficiently large to include new recreational facilities and parkland. This site is environmentally more sustainable. Proposed developments in the centre of Luton are also being challenged. If all the sites go ahead, it amounts to an over-supply of houses rather than unmet needs being fulfilled.

#### **Policy NE4: Green Spaces**

Green spaces are essential to the health and well-being of the population but this proposal would mean that access to the countryside for relaxation, recreation and tranquillity will be severely reduced. Many miles of country footpaths enjoyed by many and not least including Luton residents will be concreted over. Plans for green areas within the development will not compensate for this huge loss of green spaces. This goes against Policy NE4: protecting publically accessible open space which states that planning permission will be granted for any proposed loss of open space only where it can be demonstrated that the open space is surplus to requirements. In our view, this open space is not surplus to requirements but is a vital resource and recreational area that people are using.

#### **Policies SP6, SP7, T1: Road Infrastructure, Traffic and Transport**

The road infrastructure in the area is already unable to cope with current levels of traffic. Roads into Luton, roads to Luton airport and roads which access the M1 are gridlocked at several times of the day at present. This will be further exacerbated if this development went ahead.

There are already long tailbacks of vehicles at both the Luton and Hitchin ends of the A505 with frustrated drivers taking to inadequate country lanes to try and avoid the worst bottlenecks.

Many local roads in the vicinity of the proposed site are narrow country lanes with single track stretches and they too will be unable to cope with increased traffic, particularly public transport vehicles and large delivery vans and lorries required to serve the development.

Member of Preston Parish Council have recently undertaken a traffic survey on the road through the village to and from Luton. At the 2011 census the population of the Parish of Preston was 420 and there was only a small amount of local traffic. One Monday morning there were 123 through vehicles in one direction and 120 in the other in 50 minutes. This included the time children were walking to the village primary school and crossing the road was extremely difficult. The following afternoon, there were 60 vehicles one way and 83 the other between 3.00 and 4.00p.m. During the evening rush hour, between 4.30 and 6 p.m, there were 189 through vehicles coming from Luton and 126 going towards Luton.

Already the amount of traffic is putting an immense strain on the local road infrastructure and quality of life in this small rural community. If the East of Luton development went ahead, it would result in a significantly higher volume of traffic. This would mean that the infrastructure would be severely tested and the effect on the quality of life of local residents would be incalculable.

While the transport section of the Local Plan emphasises sustainable transport and points out that road infrastructure will be decided at the site for development, it seems unlikely that our local roads will be improved despite the anticipated increase in traffic.

The Parish Council has learnt that Luton has assumed that by 2031 a spine road will be extended from these sites to the A505 near its junction with the road into Lilley. The Parish Council has also been informed that neither Hertfordshire County Council nor North Hertfordshire District Council have plans or funds to widen the country lanes. Luton has no plans or budget for this itself.

#### **Policy SP10: Healthy Communities**

Local primary schools at Cockernhoe and Wigmore are already oversubscribed. The application does not indicate where the many additional children will be educated at either Primary or Secondary level. There do not seem to be any realistic plans for increased provision of essential services such as GP surgeries, hospitals, emergency services, police and adequate public transport. The number of dwellings in this proposal means that all these services will require more resources.

#### **Conclusion**

Preston Parish Council believe that the points raised here clearly indicate that the inclusion of sites EL1, EL2, EL3 in the Local Plan Proposed Submission are unsound, unjustified and are not consistent with National Policy and should, therefore, be rejected.