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Subject: Examination of the North Hertfordshire Local Plan 2011 - 2031  
Date: 21 February 2020 at 12:56:43 GMT  
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Begin forwarded message:

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EXAMINATION OF THE NORTH HERTFORDSHIRE LOCAL  
PLAN 2011 - 2031 (MODIFICATIONS)

REPRESENTATION

MATTER 23  
NHDC GREENBELT REVIEW UPDATE 2018

2 Green Belt Methodologies  
2.9 Potential impacts, visual and physical have been considered in this update  
2.10 Potential Green Belt sites passed 3 key tests - Suitability, Availability and Achievability in the Council's

Strategic Housing Land Availability Assessment (SHLAA)  
(MOU9)

EXAMINATION OF NORTH HERTS LOCAL PLAN 2011-2031  
SCHEDULE OF FURTHER MIQ's  
JAN 2020

MATTER 23 - GREEN BELT REVIEW WK2  
SITE SELECTION PROCESS

Q. Why have Assessments changed?

23.1 This was done in -

A two stage process which consisted of an initial sift through land and Green Belt land, (Green Belt Review and its update 2018), to assess suitability

Stage 2 - This was to assess contribution to areas and judge whether EXCEPTIONAL CIRCUMSTANCES existed to warrant the 'release' in question from the Green Belt.

23.2 CONCLUSIONS in the Green Belt Review 2018 DIFFERED from the original conclusions of the review. Some sites are NOW CONSIDERED TO MAKE A SIGNIFICANT CONTRIBUTION to the Green Belt (which were previously assessed as making a lesser contribution).

LOCAL PLAN 2011-2031  
GREENBELT REVIEW UPDATED 2018

PART ONE  
Page 11

Sub Parcels  
Page 12 Safeguarding the Countryside from encroachment

Contribution to Green Belt overall

2a SIGNIFICANT

2b MODERATE

2c SIGNIFICANT

2d SIGNIFICANT

2e SIGNIFICANT

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Figure 4.4 Overall Contribution to Green Belt Purposes

2a, 2d, 2c - SIGNIFICANT

2b & 2e - MODERATE

(Full assessment forms are contained in Appendix 13)

(Figures 4.5 - 4.10)

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Table 3. Summary Revised Assessment of Potential Green Belt Development Sites

Site Ref.	Overall	Settlement	Parcel
212a	SIGNIFICANT	N/E Luton	29
340	LIMITED	Dancote ( Cockernhoe)	2c
ELW	SIGNIFICANT	Luton East (West)	2c
ELE	SIGNIFICANT	Luton East (East)	2d

Page 34 Sites

4.14 These areas relate to potential development

locations around the main 'town' in or adjoining the district  
Three are to the EAST OF LUTON

4.15 In ALL cases (12 sites), EAST OF LUTON, being the first given , are all judged by the revised assessment to have potentially SIGNIFICANT impacts of such development on the visual and physical openness of the Green Belt . There are 9 of these which are additionally assessed as having potentially significant impacts on the purpose of checking restricted sprawl of large built-up areas'.

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Figure 5.3

Map shows sites assessed as having increased or decreased overall contributions to Green Belt purposes compared with the 2016 Study

IT SHOWS SITES TO THE EAST OF LUTON ARE INCREASED NOT DECREASED IN CONTRIBUTIONS

PART TWO

Implications of the Update for the Plan

Table 8

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Comparative analysis of the contribution of proposed Local Plan allocations to Green Belt purposes

OVERALL (UPDATE) CONTRIBUTION OF EL1, EL2, EL3 (all East of Luton sites) ARE NOW SIGNIFICANT

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Reference

NHDC's Response to Environment Sensitivity Study

Prepared by The Landscape Partnership for NHDC by

Jonathan Billingsley 24/7/09

The above was prepared to inform the selection of potential

growth areas around Luton and response to the Emerging  
Luton and South Bedfordshire Core Strategy

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Site	Study	ESA	TLL
		Sensitivity	
	Sensitivity		
		Grade	
	Grade		
L1	LUC	1a & 1b	

Comments - In agreement with the LUC Assessment the key characteristics except for omitting Putteridge Bury, most of the area is grade 1a and away from the A505 and FLIGHT PATH OF LUTON AIRPORT. The area is of strong character, high quality and sensitive. DEVELOPMENT is NOT appropriate

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[www.parliament.uk](http://www.parliament.uk)

Friday January 4th 2019/House of Commons Library

“Government is committed to the Green Belt - only when authorities demonstrate that they HAVE EXAMINED FULLY ALL OTHER REASONABLE OPTIONS FOR MEETING THEIR IDENTIFIED REQUIREMENTS”

This briefing from the House of Commons library examines some of the controversy about the Green Belt in England and how policy towards the Green Belt has been reflected in the updating of the NPP Framework 2018.

In this report it states that there are many questions and arguments.

The Select Committee on Communities and Local

Government (NPPF Dec.2014 -15) published a report concluding that there HAD BEEN INAPPROPRIATE

DEVELOPMENT and Local authorities should be encouraged

to review their Green Belt.

LUTON BOROUGH COUNCIL HAS NOT EXHAUSTED ALL OTHER AREAS BEFORE ACCEPTING the Unmet Needs Offer of building on Green Belt land from NHDC

BROWNFIELD Land Register/Luton Borough Council  
December 2019

The history of all sites was renewed in December 2019

For Part 2 of the Register -

Luton Council decided not to enter any sites saying - "The Luton Local Plan 2011 - 2031 was recently adopted

07Nov17, allocating sufficient sites to support the delivery of new homes. The plan was formally inspected and it was found that there is sufficient supply of housing sites having reasonable certainty of coming forward in the plan period TO MEET HOUSING TARGETS".

This is only the Revised Brownfield Register of Luton Borough Council. Are they abusing the Government's definite decisions and guidance towards protecting the Green Belt and not using available brownfield sites?

The East of Luton is not only an already massive home building site, but it also has a Nationally Significant Infrastructure, Luton Airport Expansion presently underway to the East of Luton. The airport plans continue until 2039. Nevertheless there continues to be a constant flow of 'new sites' for home building which suddenly seem to appear!

(2 short Examples)

Luton Today /20 September 2019

An application to replace a disused car park with new homes, 25 x 4 bed Townhouses and 8 x slightly larger 4 bed houses

Luton Borough Council's own Housing Company Foxall Homes is behind this project

David Franks/Luton Liberal Councillor

Feb 14th 2020

He announced that investigations were being carried out on a green in Littlefield Road (East of Luton once more) for a housing development. This is much needed Green Space for local families now as much as it was when it was first designed! Residents are stunned!

Also,

Central Beds (an acrimonious relationship with Luton), were advised by the Inspector of the Central Beds enquiry that effort must be made to help Luton. The North of Luton has a large amount of land with road infrastructure already in place and Central Beds are now planning to build 4000 new homes there.

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EAST OF LUTON -LONDON LUTON AIRPORT EXPANSION TO 38 MILLION PASSENGERS PER YEAR

INITIALLY when the East of Luton Green Belt was selected as a possible site for the building of new homes, London Luton Airport Expansion Plans were not released at that time. It is actually very hard to believe that they suddenly appeared from thin air! No clear mention of the possibility of such a HUGE project looming when investigations of suitability of Sites EL1, EL2, EL3 Green Belt Land were being carried out and residents began this long battle to retain the land.

SITES EL1, EL2, EL3 are situated near to and almost on top of this absolutely horrendous, polluted area of Airport Expansion.

It is making the lives of its residents a nightmare. Air is permanently heavy with fumes and at night when residents are sleeping, although night planes are supposedly monitored, they take off disturbing everyone's sleep. The Health effects from this Airport Expansion are without doubt not without cost to residents! Luton Borough Council should be made accountable for the health problems which are being induced by thoughtless planning. A Climate Emergency was recently announced by Luton Borough Council. We wait in anticipation for possible improvements in the matter!

THIS QUALITY EAST OF LUTON GREENBELT NEEDS TO BE RETAINED. It is merely destruction for monetary gain only. All other reasonable options have DEFINITELY NOT been exhausted.

The contribution that this East of Luton Green Belt land, in all of the areas which were investigated and modified is massively important to an ever decreasing 'green space' 'more concrete area'

THE EAST OF LUTON GREENBELT LAND SHOULD NOT BE RELEASED - EXCEPTIONAL CIRCUMSTANCES EXIST

PLANS TO BUILD ON GREEN BELT TO THE EAST OF LUTON IS NOT JUSTIFIED

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