

From: Derek Bromley - Bidwells  
Subject: North Herts Local Plan Examination. Further hearing session. Matter 24  
Date: 10 February 2020 at 13:58:21 GMT  
To: PO Services <louise@poservices.co.uk>

Dear Sir

Bidwells acts for 2 landowners included within the East Luton site, ATO Holdings Ltd and Mr and Mrs Humphreys. As part of the allocation the landowners expect their land will be developed in the latter stages of the sites build programme. Whilst we make submissions on behalf of our clients in relation to Matter 24 inevitably this also crosses and interacts with Matter 23

It is acknowledged that Luton Borough is constrained by the Green Belt around all its boundaries. To provide for Luton's Housing need beyond the Green Belt and within the Housing Market Area would undoubtedly bring conflict with the aims and objectives of sustainable development created by the additional and longer trip generation and the production of larger amounts of emissions of gases and particulates. In terms of location and proximity to higher order community/ education/ leisure and recreation, urban extensions to Luton present the most logical solution to a raft of planning considerations.

The NHDC Local Plan provides for Green Belt enlargement to provide greater Green Belt separation between Luton and Stevenage, this is compensatory Green Belt to ensure there is no dilution to the purposes and functions of the Green Belt in this area. That as far as we are aware it not replicated by other neighbouring Authorities around Luton.

The Duty to Co-operate extends we believe as co-operation between Luton and each of its neighbouring Authorities independently and not collectively. For co-operation to be extended between the neighbouring Authorities collectively would require a single comprehensive Green Belt Review study commissioned by the Authorities jointly. Each Council would be very protective of the Green Belt in their Administrative area. That study would then need to balance the Green Belt areas as they exist, but in the case of the Green Belt in North Herts taking into account the enlargement between Luton and Stevenage. It is the landowners belief that this level of evidence base goes beyond what is necessary for legal compliance and soundness of the NHDC Plan.

In the circumstances our clients endorse the NHDC position regarding the Submission Plan, East of Luton Green Belt release.

Regards

Derek

Derek bromley

Bidwells

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