



WHITE PEAK Planning

Matter 10 Hearing Statement: Housing Allocations and the Settlement Boundaries: The Towns: Luton (Cockernhoe)

North Hertfordshire Local Plan Examination

On behalf of Bloor Homes

January 2018

Ref: 2012.002

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Authorised for and on behalf of White Peak Planning Ltd.

A handwritten signature in black ink, appearing to read 'Rob White', written over a horizontal line.

**Rob White
Director**

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Appendices

Appendix A – Illustrative Context Masterplan (FPCR ref: 3322-L-102 rev N)

Appendix B – Site Location Plan (FPCR ref: 3322-L-101 rev C)

Appendix C – Email letter from Arriva dated 10th January 2018

Appendix D – Landscape and Visual Impact Assessment (extracts)

1.0 Introduction

1.1 Background

- 1.1.1 The housing allocations proposed adjacent to Luton and Cockernhoe are Sites EL1, EL2 and EL3.
- 1.1.2 Bloor Homes has submitted a planning application (ref: 17/00830/1) covering the majority of sites EL1 and EL2 for up to 1,400 new homes, as well as a local centre, primary school and all-through school. In addition, The Crown Estate has submitted an outline planning application (ref: 16/02014/1) for 660 new homes at Site EL3. A comprehensive Masterplan for the whole allocation covering Sites EL1, EL2 and EL3 has been prepared and submitted as part of the 17/00830/1 application (see *Appendix A*).
- 1.1.3 Supporting information accompanying application 17/00830/1 included an Environmental Statement (ES), Flood Risk Assessment (FRA) and Transport Assessment (TA), which considered the effects of the EL1 & EL2 proposals as well as a cumulative assessment with the EL3 proposals. As a consequence the combined land east of Luton proposed allocation has been robustly assessed in environmental and highways terms and subject to scrutiny by statutory and non-statutory consultees, district and county council officers and local residents.
- 1.1.4 These documents and other information supporting the planning application can be viewed on North Hertfordshire District Council's website via their planning page using the application reference above or weblink: <http://pa.north-herts.gov.uk/online-applications/>.
- 1.1.5 This Statement is submitted on behalf of Bloor Homes and as application 17/00830/1 includes Sites EL1 and EL2, this Statement responds to the Inspector's questions by considering the two sites in combination rather than individually.
- 1.1.6 In response to application 17/00830/1, at the time of writing this Statement the following statutory consultees had either responded either supporting or not objecting to the application, or their initial concerns had been resolved and objections withdrawn:
- Environment Agency
 - Highways England
 - Historic England
 - Sport England
 - Hertfordshire Ecology
 - Herts and Middlesex Wildlife Trust
 - NHDC Housing and Environmental Health
 - NHDC Environmental Protection – Air Quality and Contaminated Land
 - NHS East and North Herts CCG

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- 1.1.7 Bloor Homes has actively participated in the preparation of Local Plans for both North Hertfordshire, Luton and Central Bedfordshire for a number of years. Consistently, the development proposals for a strategic urban extension to the east of Luton have been favourably considered in assessments of how best to accommodate the future development needs of Luton, for which it is accepted that these cannot be met entirely within Luton's own administrative boundary.
- 1.1.8 For development to be considered sustainable, it should, where possible, be met close to where the need arises and in an accessible location. Land to the east of Luton has been identified within the evidence base as falling within the Luton Housing Market Area (HMA)¹ and therefore, it is right that Sites EL1 and EL2 are allocated for residential development to help meet Luton's needs.
- 1.1.9 Bloor Homes therefore, welcomes and supports the proposed allocation of land east of Luton and the consequent removal of Sites EL1 and EL2 from the Green Belt in order to allocate them for development, and our comments to the questions posed by the Inspector are thus set within this context.

¹ See HOU3 Figure 38 on page 47 or HOU7 Figure 1.1 on page 3

2.0 Responses to Inspector's Questions

2.1 Issue 10.25

10.25(a)

- 2.1.1 The majority of allocation sites EL1 and EL2 are controlled by Bloor Homes and are included within the boundary of planning application 17/00830/1.
- 2.1.2 The Site Location Plan for the application is shown in *Appendix B* and we can confirm that all of the land within the application boundary is available for development.
- 2.1.3 Equally it can be confirmed that The Crown Estate control all of the land in EL3 and that it is available for development.

10.25(b)

- 2.1.4 Planning application 17/00830/1 includes a Transport Assessment (TA) which demonstrates that safe and appropriate access for vehicles and pedestrians can be provided to Sites EL1 and EL2 based on:
- Extensive discussions with the Highway Authority over several years;
 - Reviews of personal injury accident data (see TA Section 3.4 and Appendices D and E);
 - Stage 1 Road Safety Audits have been undertaken by independent specialist safety auditors on the proposed site accesses and highway mitigation schemes, including pedestrian/cyclist enhancements giving confidence that safe and appropriate access for all road users will be provided on the local highway network (see TA Appendices F, H, I and J and TA figures);
 - New and improved pedestrian and cycle links (See TA Figure 11 and Appendix A and J); and
 - Agreement with the local bus operator Arriva over the feasibility of providing a new bus service (see TA Section 4.5), with an indicative route shown in TA Figure 12.
- 2.1.5 The conclusions of the Transport and Accessibility Assessment in the Environmental Statement (see *ES Chapter 10 section 10.8*) are that the proposed development will have negligible to minor beneficial impacts on pedestrians, cyclists, public transport users and motorists with the proposed mitigation measures in place and that these impacts will be the same for the wider cumulative impact assessment for the entire allocation.
- 2.1.6 Highways England has confirmed that subject to the inclusion of a standard planning condition requiring a Framework Travel Plan that it has no objections to the development proposed in application 17/00830/1, nor has it separately to application 16/02014/1 and that the proposals will thereby not adversely impact the Strategic Road Network.

- 2.1.7 Discussions are ongoing with both the relevant Local Highways Authorities, being Hertfordshire and Luton, with regards to the details of proposed off-site mitigation works and site access arrangements, but the access junction designs were agreed in principle with HCC pre-application and no in principle objections to the allocation proposals have been raised by either authority post-application.
- 2.1.8 Similarly discussions are ongoing with Arriva with regards to the provision of a suitable bus service to serve the proposed development, and a copy of an email received from them is included at *Appendix C*.
- 2.1.9 The allocation is well served by existing on and off-road cycle routes and an extensive network of footpaths and bridleways. The development proposals will protect and enhance the existing routes and network and provide new pedestrian and cycle connections through the site to the surrounding communities and countryside to the benefit of existing and future residents.

10.25(c)

- 2.1.10 Proposed allocation Sites EL1 and EL2 are deliverable, having regard to the provision of the necessary infrastructure and services, as well as environmental and other constraints.
- 2.1.11 Regarding infrastructure, discussions have been held with utilities providers who have confirmed that the site can be provided with gas, electricity, fibre and water infrastructure to both the proposed domestic and commercial properties.
- 2.1.12 Thames Water has also undertaken a sewer impact study for application 17/00830/1 and this is shown in Appendix M5 of the Environmental Statement (ES). Thames Water has identified the improvements that would be required to the existing foul network and provided mitigation options in order to facilitate development. Both of the options provided by Thames Water are deliverable and future flows can be accommodated in the network.
- 2.1.13 The Environmental Statement (ES), Flood Risk Assessment (FRA) and Transport Assessment (TA) have demonstrated that there are no environmental or highways constraints that would prevent the development of these sites.
- 2.1.14 As set out above through their consultation responses to the applications the key statutory consultees in this regard have either confirmed they have no objection to the proposals or have had issues raised satisfactorily resolved, either through clarification or through the mechanism of planning conditions or obligations.

2.2 Issue 10.26

- 2.2.1 Sites EL1 and EL2 are justified and appropriate in terms of the likely impacts of development. The topic of Green Belt harm is covered in *Section 10.28*.
- 2.2.2 Application 17/00830/1 is supported by an ES, TA, FRA and Planning Statement which demonstrate that the likely environmental, social and economic impacts associated with development of Sites EL1 and EL2 can be appropriately mitigated or enhanced.

- 2.2.3 Examination document HOU8 provides an assessment of the proposed allocation sites and assesses their suitability for development.
- 2.2.4 The findings in Section 6.2 of HOU8 state that Site EL1 is potentially suitable, but that development of EL2 could result in adverse landscape and visual effects on the surrounding area.
- 2.2.5 We disagree with the findings of the PBA report (HOU8) in relation to the location of the ridgeline and the potential landscape and visual effects associated with Sites EL1 and EL2 and ES Figure 5.5 Topography (see *Appendix D*) identifies the location of the ridgeline more precisely, confirming the assessment made in HSHBP.
- 2.2.6 The design of the proposed development of Sites EL1 and EL2 has been 'landscape-led' and based on an initial appraisal of topography and landscape features. A Masterplan was then developed, ensuring through the inclusion of new Green Infrastructure, retention of key landscape features and the siting of development parcels, that the proposals could not be seen from Lilley Valley or the Chiltern Hills Area of Outstanding Natural Beauty (AONB).
- 2.2.7 A detailed and comprehensive Landscape and Visual Impact Assessment (LVIA) has been undertaken as part of the EIA for application 17/00830/1. The scope of the LVIA, including the locations of key viewpoints, was agreed with NHDC. The findings of the LVIA are summarised in ES Chapter 5 with key extracts presented in *Appendix D* including:
- ES Figures 5.1 – 5.24 comprising:
 - Figure 5.1 – Aerial Photograph
 - Figure 5.2 - National & District Landscape Character
 - Figure 5.3 - Local Landscape Character
 - Figure 5.4 – Landscape Designations
 - Figure 5.5 – Topography
 - Figure 5.6 – Visual Appraisal
 - Figures 5.7 – 5.24 Photo Viewpoints
 - ES Appendices E3 – E5 comprising:
 - E3 – Landscape Effects Table
 - E4 – Baseline Viewpoint Descriptions
 - E5 – Visual Effects Table
- 2.2.8 The LVIA demonstrates that potential adverse landscape and visual effects associated with development of Sites EL1 and EL2 can be mitigated through sensitive scheme design and new and retained Green Infrastructure. A detailed Green Infrastructure and Biodiversity Management Plan (GIBMP) has also been prepared which sets out how the proposed Green Infrastructure will be managed to benefit biodiversity and the local landscape (see ES Appendix E6).
- 2.2.9 The main conclusions from the LVIA can be summarised as follows:

- A limited extent of Visual Envelope that does not extend beyond circa 0.5km from the site boundary (see Figures 5.1 and 5.6) with the proposed development well contained by landform;
- A minor adverse effect on the Breachwood Green Ridge landscape character area (see Figures 5.2 and 5.3 and ES Appendix E3);
- No effects on adjoining landscape character areas (see Figures 5.2 and 5.3 and ES Appendix E3);
- No landscape effects on the Chilterns AONB or the Putteridge Bury Registered Park and Garden (see ES Chapter 5, section 5.6 and Appendix E3);
- Visual effects limited to localised and on-site views (see Figure 5.6 and ES Appendix E5), noting:
 - No effects on views from public rights of way (PROW) in the Chilterns AONB and negligible effect on its setting and visual amenity;
 - No effects on views from Lilley Valley, including residential properties along Lilley Bottom or PROWs;
 - Negligible or minor beneficial impacts on views from Putteridge Bury RPG.

2.2.10 As outlined above, the reason for these findings which vary with the findings of HOU8 in relation to Site EL2 are due to a disagreement over the location of the ridgeline which forms the western edge of Lilley Valley.

2.2.11 A previous document produced by the Council in 2014 at the Local Plan 'preferred options' stage, titled 'Housing and Settlement Hierarchy Background Paper' (HSHBP), identified the ridgeline as running along the northern boundaries of sites EL1 and EL2, whereas PBA identify the ridgeline as a wide zone that includes Site EL2 and large parts of EL1.

2.2.12 On the above basis, we consider that Sites EL1 and EL2 are both appropriate for development and that robust justification for this is provided as part of application 17/00830/1.

2.3 Issue 10.27

2.3.1 Sites EL1 and EL2 are the most appropriate option for development to help address Luton's unmet housing need given the reasonable alternatives.

2.3.2 Development options within Luton's administrative boundary were assessed by Luton Borough Council during the preparation of the Luton Local Plan, which has now been examined and recommended for adoption by an Inspector.

2.3.3 As development within neighbouring authority areas is required in order to meet Luton's unmet housing need, HOU7 assesses potential growth options within the Luton HMA. The only options that are within North Hertfordshire are Sites EL1, EL2 and EL3, which are referred to in HOU7 as L22 East of Luton.

2.3.4 Examination document HOU8 provides further critical assessment of Sites EL1 and EL2 and assesses their suitability compared to other reasonable alternatives within North Hertfordshire.

- 2.3.5 HOU8 focusses on the Luton HMA and then refines the area of search based on environmental designations and constraints, such as the Putteridge Bury Historic Park and Garden (HPG) and aircraft noise zones associated with London Luton Airport. Sites EL1 and EL2, as well as the alternatives assessed in HOU8, are all located within this area of search.
- 2.3.6 As well as the proposed allocations, the study assesses the suitability of other sites promoted through the Strategic Housing Land Availability Assessment (SHLAA), other sites promoted to the Local Plan and sites not promoted to the Council but identified by PBA for consideration as part of the study.
- 2.3.7 Of the two sites promoted to the SHLAA, the southern part of Site 212c was considered suitable, but the report acknowledges that the site is no longer being promoted by the landowners. Site 212b was not considered suitable for built development which is likely due to its location immediately adjacent to the boundary of Putteridge Bury HPG.
- 2.3.8 Of the other sites promoted to the Local Plan, only Site 341 is considered in HOU8 to be a reasonable alternative, but is located within Putteridge Bury HPG and therefore, has the potential to adversely affect the setting of the HPG.
- 2.3.9 The assessment of other sites identified by PBA noted that Sites 2, 3 and 4 could be suitable for development, however Site 4 is small and could not provide a strategic level of housing development.
- 2.3.10 Sites 2 and 3 are constrained in the same way as Site 212b as they are located immediately adjacent to the boundary of Putteridge Bury HPG. It should be noted that Site 4 forms part of application 17/00830/1, but because of its proximity to Putteridge Bury HPG, its proposed use is limited to playing pitches only.
- 2.3.11 Site 2 is owned by Luton Borough Council and is currently used as playing pitches. As it has not been promoted for development it is not likely to be available.
- 2.3.12 Therefore, we consider that the proposed allocation sites are the most appropriate option given the reasonable alternatives for the following reasons:
- The sites are close to Luton and within the Luton HMA;
 - They are of an appropriate size in order to help address Luton's unmet housing need;
 - They are located to avoid constraints such as Putteridge Bury HPG and aircraft noise zones associated with London Luton Airport; and
 - Potential harm to the surroundings can be minimised or avoided through sensitive design such as effects on Putteridge Bury RPG, the Chiltern Hills AONB and views from within the wider countryside.

2.4 Issue 10.28

10.28(a)

- 2.4.1 As set out in our Matter 7 Hearing Statement, exceptional circumstances exist to warrant the allocation of the site for new housing in the Green Belt.
- 2.4.2 The release of Green Belt land to the east of Luton is required to help meet the proportion of Luton's housing need that cannot be delivered within its own administrative boundary.
- 2.4.3 The recently examined Luton Local Plan identified an objectively assessed housing need for Luton of 17,800 new dwellings and 31,800 dwellings within the Luton Housing Market Area (HMA) between 2011 and 2031. The Luton HMA includes the administrative area of Luton, a significant part of Central Bedfordshire and additional areas within North Hertfordshire and Aylesbury Vale. The extent of the Luton HMA within North Hertfordshire is shown in Figure 3 of the Local Plan (LP1) and is entirely within the Green Belt.
- 2.4.4 The Luton Local Plan identifies capacity for 8,500 new dwellings within its boundary, which leaves an unmet housing need of 9,300 that must be delivered within neighbouring authority areas. Policy SP2 of the Luton Local Plan (as modified by the Luton Local Plan Inspector) states that:
- 'Luton Borough Council will continue to work with neighbouring and nearby local authorities to help ensure delivery of the Borough's unmet needs in other local authority areas under the 'duty to cooperate'. Luton BC will continue to work with its neighbouring authorities to help ensure the needs of the Luton HMA are met within the HMA. This work is to be informed by the Joint Growth Options Study including 'Areas of Search' for growth of Luton to the North, South, East and West.'*
- 2.4.5 The proposed allocation sites EL1, EL2 and EL3 were discussed at the Luton Local Plan examination and accepted by that Inspector to be appropriate and deliverable. Paragraph 140 of the Inspector's report into the Luton Local Plan² acknowledges the proposed contribution of 1,950 new homes in the North Hertfordshire Local Plan towards meeting Luton's housing need.
- 2.4.6 The Inspector's report also acknowledged the lack of certainty from Central Bedfordshire and Aylesbury Vale in terms of their contributions. The July 2017 consultation on the draft Central Bedfordshire Local Plan³ stated in Table 7.2 that 7,400 dwellings would be delivered within Central Bedfordshire to help meet Luton's needs. This target would leave a shortfall of 1,900 dwellings to be met elsewhere within the Luton HMA.
- 2.4.7 Following consultation on the draft plan during the summer of 2017, Central Bedfordshire Council recently approved its Pre-Submission version Local Plan for consultation commencing 11th January 2018⁴, with the plan committed to being

²

<https://www.luton.gov.uk/Environment/Planning/Regional%20and%20local%20planning/Pages/Local%20Plan%202011%20-%20202031.aspx>

³ <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/local-plan.aspx>

⁴ <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/have-your-say-2.aspx>

submitted to the Secretary of State for examination prior to the end of March 2018.

2.4.8 Policy SP1: Growth Strategy of the pre-submission version of the plan confirms that the proposed housing target for the Central Bedfordshire Local Plan will be 39,350 new homes.

2.4.9 This is broken down at Table 6.1 to comprise:

- Objectively Assessed Housing Need for Central Beds – 32,000
- Unmet Need from Luton – 7,350

2.4.10 With reference to the shortfall of 9,300 new homes in the recently adopted Luton Local Plan, this confirms the unmet need remaining with the Luton HMA to be 1,950 new homes.

2.4.11 It should be noted that the level of housing to be delivered in Central Bedfordshire to help meet Luton's need could be affected by the potential introduction of the new standard methodology for calculating housing need if for any reason their plan is not submitted prior to the end of March 2018. The consultation document by the Department for Communities and Local Government (DCLG) titled '*Planning for the right homes in the right places: consultation proposals*' stated that the level of housing need under the standard methodology would be 2,553 dwellings per year, which is significantly higher than the current target of 1,600 per year included in the Pre-Submission Central Bedfordshire Local Plan.

2.4.12 Given the stated housing target in the pre-submission plan and the potential uncertainty if submission of the plan is delayed, it is important that Central Bedfordshire is not relied upon to deliver Luton's unmet housing need in its entirety and that North Hertfordshire is also expected to contribute. This approach would also appropriately reflect the geographic extent of the Luton HMA and associated travel to work patterns between North Hertfordshire and Luton.

2.4.13 MOU8 includes a Memorandum of Understanding between NHDC and Central Bedfordshire Council (CBC) that confirms agreement between the parties that NHDC can contribute 1,950 dwellings towards Luton's unmet need and that '*the allocations to the east of Luton (EL1, 2 and 3) are the appropriate scale and extent to ensure NHDC has maximised its contribution to the unmet need arising from Luton.*'

2.4.14 The Luton Local Plan Inspector states in Paragraph 144 of his report that '*in order to be positively prepared, neighbouring plans will need to be based on a strategy which seeks to meet unmet requirements from Luton, where it is reasonable to do so and consistent with achieving sustainable development.*' Therefore, in conclusion, exceptional circumstances exist to warrant the release of land East of Luton from the Green Belt in order to help meet Luton's unmet housing need.

10.28(b)

- 2.4.15 The long standing importance attached to the Green Belt is re-iterated in paragraph 79 of the NPPF, along with the aims of preventing urban sprawl by maintaining permanent open areas.
- 2.4.16 The evidence base to the Local Plan includes the North Hertfordshire Green Belt Review (CG1) undertaken in 2016. A previous Green Belt review was also carried out at the 'preferred options' stage and is dated November 2014. This document is titled 'Green Belt Review – Part 1'⁵.
- 2.4.17 Both CG1 and the 2014 Green Belt Review refer to Site EL1 as ELb and Site EL2 as ELa. The assessments, shown in Table 9 of the 2014 report and Table 5.3 of CG1, demonstrate that Sites EL1 and EL2 contribute to two of the five purposes of the Green Belt set out in paragraph 80 of the NPPF, namely:
- To check unrestricted sprawl of large built up areas; and
 - To assist in safeguarding the countryside from encroachment.
- 2.4.18 Due to being located adjacent to the built up area of Luton, by definition these parcels will contribute to checking the unrestricted sprawl of large built up areas and contribute more than greenbelt parcels beyond, and similarly safeguarding the countryside.
- 2.4.19 The sites make less of a contribution towards preventing neighbouring towns from merging or preserving the setting and special character of historic towns as there are none nearby. The sites are also considered to have a limited role in urban regeneration as the nearby town of Luton is obliged to maximise the urban capacity within its administrative area in order to reduce the level of housing need that must be met within neighbouring authority areas.
- 2.4.20 Both CG1 and the 2014 Green Belt Review assessed the contribution that the sites make to the purposes of Green Belt and found that they provide a 'moderate contribution', with the focus being on restricting the expansion of Luton into the North Hertfordshire countryside. However, their moderate contribution derives principally from their adjacency to Luton as opposed to other factors and this is the reason they are defined as making a greater contribution than otherwise similar parcels beyond.
- 2.4.21 Therefore, the nature and extent of harm to the purposes of the Green Belt would be limited to the expansion of the urban area, which is necessary in order to help address Luton's unmet housing need. There are no additional factors or contributions that differentiate these parcels from the surrounding greenbelt land.

10.28(c)

- 2.4.22 The landscape-led approach to the masterplanning of Sites EL1 and EL2 (shown in 17/00830/1) seeks to reduce the potential harm to the openness and purposes of Green Belt in the area

⁵http://northherts-cms.cms-dev.firmstep.com/sites/northherts-cms/files/files/green_belt_review_part_1a_november_2014.pdf

2.4.23 The Masterplan has sought the retention of key landscape features augmented by structural planting to ensure that the design of the proposed development is appropriate for its landscape setting. In addition, the use of the existing woodland blocks, hedgerows and hedgerow trees in conjunction with the proposed additional planting, tightly contains the visual influence of the proposals, as shown in the LVIA in *Appendix B*.

2.4.24 The proposed Green Infrastructure will comprise circa 45% of the whole site, which reduces potential harm to the openness of the Green Belt as large permanent open areas will be retained.

10.28(d)

2.4.25 If Sites EL1 and EL2 were developed as proposed, a new defensible Green Belt boundary would be established along the northern boundary of Site EL2 and the north western boundary of Site EL1 as shown on the Proposals Map (Sheet 1, Side B).

2.4.26 There is an extensive amount of Green Belt either existing or proposed to the north, east and south east and therefore, the Green Belt will continue to serve its primary purposes in this location of checking unrestricted sprawl of large built up areas and safeguarding the countryside from encroachment.

2.4.27 As demonstrated in the LVIA in *Appendix B*, harm to the openness of the Green Belt beyond the new boundary will be limited as the site is visually self-contained with no views from the Chiltern Hills AONB or Lilley Valley. The boundaries to the development, specifically those which are adjacent or near to existing villages, have included substantial green buffers to ensure that it will not affect the wider openness of the Green Belt beyond.

10.28(e)

2.4.28 There is no evidence that the proposed Green Belt boundary around Sites EL1 and EL2 would need to be altered at the end of the plan period.

2.4.29 The proposed Green Belt boundary is defensible as the sensitivity of the landscape to the north east of Site EL2 would limit the likelihood of future development in this direction and therefore, future Luton expansion would need to be located elsewhere in the Luton HMA.

10.28(f)

2.4.30 The proposed Green Belt boundaries are consistent with the Local Plan's strategy for meeting identified requirements for sustainable development.

2.4.31 The release of Sites EL1 and EL2 from the Green Belt are intended to enable new housing to be delivered to meet Luton's need as close as possible to where the need is arising. The sites are located within the Luton HMA and have a functional relationship with Luton as they are adjacent to its administrative boundary.

10.28(g)

- 2.4.32 The new Green Belt boundary around Sites EL1 and EL2 has been clearly defined using physical features where possible.
- 2.4.33 At the north west of Site EL1 the boundary runs along Chalk Hill, which is a road connecting Cockerhoe to Lilley Bottom. At the eastern side of the site, the new boundary runs along the road connecting Tea Green and Wandon End with the urban edge of Luton.
- 2.4.34 At the north east of Site EL2, the new Green Belt boundary follows the edge of existing woodland blocks along the ridgeline between Chalk Hill and Tea Green. The field boundary between Stubbocks Wood and the woodland adjacent to Tea Green will be reinforced through new structure planting to provide a continuous wooded edge at the north east boundary of Site EL2, which will help to clearly define the boundary.

2.5 Issue 10.29

- 2.5.1 Cockernhoe is described in Policy SP2 as a 'Category A' village and therefore, development would be only allowed within its defined settlement boundary. The inclusion of Cockerhoe in Category A is consistent with the Local Plan's methodology for identifying settlement boundaries.
- 2.5.2 Although the new settlement boundary will include Sites EL1, EL2 and EL3, no additional Green Belt release is proposed around Cockernhoe and Mangrove Green to facilitate development, which is consistent with the Local Plan's strategy and therefore, appropriate and justified.