

Hearing Statement

02/20

North Hertfordshire Local Plan Examination
Statement on behalf of Abbey Land Developments Limited



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North Hertfordshire Local Plan Examination

Matter 24 - the proposed 'East of Luton' sites: Statement on behalf of Abbey Land Developments Limited

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Introduction

1. JB Planning Associates have been instructed by Abbey Land Developments Limited to respond to Matter 24 concerning the proposed 'East of Luton' sites.
2. Abbey Land Developments Limited have a substantial land interest extending to about 300 hectares located to the West of Luton. The land to the West of Luton (WOL) has been promoted as a sustainable urban extension since 2008, firstly through the Joint Core Strategy being prepared by Central Bedfordshire Council and Luton Borough Council, secondly through the Central Bedfordshire Development Strategy and more recently through the Central Bedfordshire Local Plan during 2019.
3. The West of Luton proposals are predicated on meeting a significant proportion of Luton's unmet housing needs which at the time of the Central Bedfordshire Local Plan examination last year was 9,300 dwellings with 1,950 dwellings proposed to be met by the North Hertfordshire Local Plan and the remaining 7,350 dwellings in the Central Bedfordshire Local Plan.
4. The adopted Luton Local Plan 2017 Spatial Development Strategy Policy LLP2 confirms Luton's unmet housing need of 9,300 dwellings and that **"Luton BC will continue to work with its neighbouring authorities to help ensure that the needs of the Luton HMA are met within the HMA. This work is to be informed by the Joint Growth Option Study including 'Areas of Search' for growth of Luton to the North, South, East and West"**.
5. This Hearing Statement is put forward to assist the Inspector in his consideration of the comparative assessment described in ED166 (paragraphs 20 and 21) by highlighting that our clients land to the WOL, is a reasonable alternative when considering the sites available in the Luton Housing Market Area (HMA).

Matter 24 - Response to the Inspector's Questions

The three 'East of Luton' sites are proposed to deliver 1,950 new homes to assist in addressing the unmet housing needs of Luton Borough, which is identified as being 9,300 homes of the Luton plan period of 2011 to 2031.

For the purpose of this examination, as part of the consideration of the existence or otherwise of the exceptional circumstances necessary to warrant the 'release' of the East of Luton Sites from the Green Belt, it is necessary to have regard to the alternative options available. Given that these sites are intended to assist in addressing Luton Borough's unmet housing need, it is relevant to consider options outside of the North Hertfordshire District Council administrative area.

The four local planning authorities for the Luton Housing Market Area ('HMA') have agreed that Luton Borough's unmet needs should be met on land located as close to the boundary of Luton Borough as possible – a general point of principle that has already been explored at previous hearing sessions. Among other options around Luton, the East of Luton sites have been considered through the '*Luton HMA Growth Options Study*' (2016) [HOU7] ('the Growth Options Study').

- a) Does the Growth Options Study provide a comparative assessment of the options for addressing the unmet housing needs of Luton Borough?
6. The Luton HMA Growth Options Study 2017 (GOS) (HOU7) was commissioned jointly by Aylesbury Vale District Council, Central Bedfordshire Council, Luton Council, and North Hertfordshire District Council to assess the potential growth locations in the Luton HMA. The purpose of the study was to identify and assess, at a strategic level, potential growth options to help meet housing need in the Luton HMA. It considered the feasibility of development in 31 potential growth locations and assessed each one on whether it would be deliverable, viable, was environmentally constrained, and accessible. The Study therefore provided an independent and comparative assessment to assist the plan-making authorities.
7. The land to the WOL was identified as a potential growth location L24 in the GOS and scores well overall in comparison with other growth locations which were not as accessible. Table 1 sets out the Assessment findings for all locations and is reproduced in **Appendix 1**. Table 3.2 (at **Appendix 2**) looks at the accessibility of the growth locations to a range of services and facilities as a measure of sustainability and confirms that the WOL (L24) is the most accessible growth



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location with the highest score out of all 31 potential growth locations assessed.

8. It should be noted that Luton Town Centre and the railway station are approximately 2.5 miles to the east and Dunstable Town Centre is some 3.5 miles to the north-west. The Capability Green Business Park and London Luton Airport are located approximately 2 miles to the south-east and the Dallow Road industrial area is some 1.5 miles to the north-east.
9. The Luton - Dunstable Guided Busway is located directly to the north as is the Luton and Dunstable University Hospital which is a 7-minute walk from Hatters Way which defines the northern extent of the WOL site. The land is therefore very well related to the existing town centres, employment areas and transport hubs.
10. Accordingly, against the backdrop of a significant level of unmet housing need in the Luton HMA, growth opportunities which involve the development of land closest to the existing urban area of Luton, where the housing need arises, are preferable and generally more sustainable in planning terms than others considered on the periphery of the HMA which are some distance from Luton.
11. Luton Borough Council's position on this matter is very clear as set out in the recently adopted Luton Local Plan 2017 which states at paragraph 4.8 that,

“The Borough Council considers that the interests of the town and sustainability would best be served by meeting Luton’s unmet housing needs as close as possible to the communities from which the need arises. Indeed, under the duty to cooperate and in response to neighbouring plan preparation, particular account should be taken of this Council’s policy supporting development to the west¹ of Luton and requesting a thorough examination of strategic cross boundary options around the town (i.e. that an assessment of options north, east, south and west of Luton should be examined)”.

¹ Luton Borough Council resolved at its meeting 18 January 2011 to support development west of Luton.



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12. Our clients agree with this approach and consider it is fundamental to ensuring that Luton's substantial shortfall in housing land supply and the significant needs of the Luton HMA are addressed.
- b) From the Council's analysis in Paper C (see paragraph 39) of its response to my letter dated 9 July 2019, the Growth Options Study does not identify sufficient alternative growth locations with strong links to Luton – either through physical proximity or high-quality public transport accessibility – that would allow Luton's unmet housing needs to be met on land that is preferable in Green Belt terms to the East of Luton sites. Is the Council's analysis correct, and if not how is it incorrect?**
13. The Council's comments at paragraph 39 in Paper C are incorrect. The land to the West of Luton provides a preferable location to meet Luton's unmet housing needs when consideration is given to the findings of the assessment set out in the GOS. The WOL site physically adjoins and connects to the Luton / Dunstable / Houghton Regis conurbation via Hatters Way to the north and Luton Road to the south. There are also three footpath connections under and over the M1 between Luton with the WOL site. The Luton Dunstable Guided Busway passes to the immediately north of the WOL site with an existing on/off connection via Skimpot Lane, with excellent access at the Hatters Way/Skimpot Lane roundabout.
14. It is noted that the Council seeks to rely on the Hearing Statement produced by Central Bedfordshire Council to support its Spatial Strategy² and reference is made to paragraphs 1.3.5 and 1.3.6 in this document. This reliance is however wholly misplaced and is misleading.
15. The Technical Assessment provided as Appendix B to the Hearing Statement produced by Central Bedfordshire Council is out of date and has been overtaken by an Access Strategy Report produced by PFA Consulting dated April 2019 which accompanied our clients Matter 4 Hearing Statement³. This report highlighted the ease with which access could be obtained to the Luton Dunstable

² Central Bedfordshire Council Hearing Statement – Matter 4: Spatial Strategy (Policies SP1, SP2 SP4 and Appendix 7) as reproduced in Paper C.

³ Appendix 1 – JB Planning Associates Hearing Statement – Matter 4: Spatial Strategy (Policies SP1, SP2 SP4 and Appendix 7) Central Bedfordshire Local Plan



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Guided Busway via an existing connection point on Skimpot Lane, Caddington to the north of the WOL site. The report also demonstrated how dedicated bus routes could be provided within the site and how pedestrian and cycle access could be achieved to achieve a highly accessible and truly sustainable urban extension. Extracts from this document are reproduced in **Appendix 3**.

16. Unlike other major allocations (such as the North of Luton which is predicated upon the construction of a link road between the M1 and A6) no major off-site highway improvements are required to serve the WOL site. Nor is there a need to form a new railway crossing over the Midland Main Line as is the case with the North of Luton site. There is no requirement for a new junction on the M1 to serve the WOL site nor is there a need for the replacement or upgrade of the bridges under or over the M1. Furthermore, it is not considered that an upgrade to Junction 10 of the M1 would be required given the extensive and significant improvements now in place around that junction.
17. In relation to aircraft noise our clients commissioned Birkerdike Allen Partners to assess the effects of aircraft activity at London Luton Airport on the WOL site. In summary, the assessment found that noise from aircraft operating at London Luton Airport once full use can be made of the single runway would not materially constrain residential development should Luton expand to the west on the WOL site. This point has subsequently been confirmed by the Preliminary Environmental Information Report⁴ produced by London Luton Airport Limited to support its forthcoming Development Consent Order application to the Secretary of State to allow for the full use of the existing runway.
18. In respect of other constraints identified by Central Bedfordshire, the overhead electricity lines which cross the site might impede development on part of the land (if they cannot economically be placed underground) a significant amount of housing development could still be achieved on the site. In any event areas that might be 'sterilised' from development would provide opportunities for blue and green infrastructure provision. Accordingly, this is not a factor that should count against the site and it is not anticipated to affect delivery.

⁴ <https://futureluton.l1a1.org.uk/wp-content/uploads/PEIR-volume-1.pdf>

19. The land to the WOL therefore represents a reasonable alternative when consideration is given to the most appropriate way of meeting Luton's unmet housing need. Clearly the north or east of Luton site are also reasonable alternatives that warrant consideration. However, at the Central Bedfordshire Local Plan Examination the Inspectors have expressed concerns with the North of Luton allocation, and these concerns remain and will be considered further when that Examination reconvenes.

20. Turning to harm to the purposes of the Green Belt it is noted that North Hertfordshire District Council accepts that the WOL does “**not make a strong Green Belt contribution**” (ED173, para 31). This observation is based on the GOS (**HOU7**) as illustrated by Table 3.3 from the Study appended to this Hearing Statement (**Appendix 4**) which echoes the findings of the Central Bedfordshire and Luton Green Belt Stage 1 and 2 Study, 2016⁵. The Stage 1 and 2 Green Belt Study considered that much of the WOL site makes only a 'relatively strong' contribution to the purposes of the Green Belt in comparison to the 'strong' contribution made by the East and North of Luton sites. The Central Bedfordshire Stage 3 Green Belt Study 2018⁶ contains a finer grain assessment of both the north and west of Luton sites only and concludes that the release of either site would cause harm to the Green Belt. The basis for the change in the assessment of harm is not clear between these studies. However, in relation to the WOL the Stage 3 Study recognises that the area is more contained in landscape terms than the land to the North of Luton. Overall, the WOL site would cause less harm than the North of Luton and ought to be considered in preference to other sites especially as it is capable of being served by the Luton Dunstable Guided Busway.

21. Luton's substantial shortfall in housing land supply and the significant needs of the Luton HMA together represent, in context, 'exceptional circumstances' as envisaged by paragraph 83 of the National Planning Policy Framework, 2012

⁵ Central Bedfordshire and Luton Stage 1 and 2 Green Belt Study. Document ED CO10 in the Central Bedfordshire Local Plan Examination Library

⁶ Central Bedfordshire Stage 3 Green Belt Study. Document ED CO11 in the Central Bedfordshire Local Plan Examination Library



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(NPPF) and accordingly its provisions are engaged. Although the land to the WOL currently lies in the Green Belt, as an urban extension it would contribute materially to meeting the needs of the Luton HMA. It therefore follows that an alteration to the Green Belt boundary should have been made by Central Bedfordshire “...through the preparation or review of the Local Plan” to allow development to take place. While this is a matter for others to consider, the WOL site represents a reasonable alternative and is not only free from significant development constraints, but the independent assessment set out in the GOS clearly finds that WOL stands out as the most sustainable location for growth on the Luton HMA.

c) From the Council’s analysis in Paper C (see paragraphs 40 and 41) of its response to my letter dated 9 July 2019, the Growth Options Study identifies a total capacity of approximately 12,800 homes in locations that (partly at least) make a lesser contribution to the purposes of including land in the Green Belt. Is the Council’s analysis correct, and if not how is it incorrect?

d) Without the ‘East of Luton’ sites, are there any realistic alternative options (with a reasonable likelihood of being delivered) for addressing Luton Borough’s unmet housing need, bearing in mind the approach being taken in the Central Bedfordshire Local Plan and the current position in relation to the examination of that plan?

22. In response to Questions (c) our clients have no reason to dispute the Councils capacity estimate of 12,800 dwellings in potential growth locations have a less than a ‘strong’ Green Belt contribution. By cross reference to paragraph 31 of the Council’s Paper C this must include the WOL site.
23. The Council’s position expressed in paragraphs 19 to 21 to Paper C is also noted which are clients are in agreement with in that the HMA covers a significantly large area and it would not be appropriate to meet Luton’s unmet needs in parts of the HMA that are remote from Luton. To do otherwise would promote unsustainable travel patterns within the wider Luton area.
24. In relation to Question (d) the WOL site remains a reasonable alternative for the growth of Luton and is, together with East of Luton, Luton Borough Council’s preferred location for growth.

25. Although the Inspector examining the North Hertfordshire Local Plan is unable to consider the allocation of land outside of the District, it is correct to consider cross-boundary strategic matters such as meeting the unmet housing needs of the adjoining authority. This can only be achieved through a thorough consideration of the relative position of the East of Luton allocation against the reasonable alternatives for meeting this unmet need.
26. The references that Paper C refers to in paragraph 44 have been addressed in detail in our clients hearing statements submitted as part of the Central Bedfordshire Local Plan Examination and the following points demonstrate that the WOL site remains a reasonable alternative for meeting a significant part of this unmet need:
- (i) The spatial strategy being advocated by Central Bedfordshire in its submitted Local Plan does not seek to meet the unmet housing needs of Luton closest to where the need arises. It therefore fails to deliver this fundamental aspect of how best to meet Luton's unmet needs as expressed in their Paper C (paragraphs 15 and 16). From our clients detailed analysis of the proposed strategy⁷ it is evident that it is proposed to allocate sites which lie outside the Luton HMA as illustrated by the diagram produced in **Appendix 5**. Thus, the spatial strategy seeks to disperse future growth into neighbouring housing market areas. The Inspectors appointed to examine the Central Bedfordshire Local Plan have been highly critical of this approach and have highlighted that the Sustainability Appraisal conducted to support the Plan has not assessed reasonable alternatives, including not assessing the full scale of the opportunity for growth to the WOL of around 5,000 dwellings, only having assessed 2,000 dwellings.

⁷ Appendix 3 – JB Planning Associates Hearing Statement – Matter 4: Spatial Strategy (Policies SP1, SP2 SP4 and Appendix 7) Central Bedfordshire Local Plan



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- (ii) Our clients submitted extensive evidence⁸ in support of their Regulation 19 representations to the Central Bedfordshire Local Plan and demonstrated that the WOL site was available, suitable and deliverable thereby making a material contribution to the significant housing needs in the Luton HMA. In our clients opinion the Spatial Strategy as set out in Policy SP1 of the Central Bedfordshire Local Plan is unsound because it has failed to properly consider the extensive evidence that would support a strategic allocation to the WOL.

- (iii) In view of the significant housing needs in the Luton HMA our clients are of the view that there may be a need for housing sites to the north, east and west of Luton to be brought forward.as development to the south is constrained by the presence of London Luton Airport and the Luton Hoo Estate. However, there remains problems with deliverability of the scale of development proposed to the north of Luton (see point (iv) below) and the contribution that this site can make in the plan period reinforcing the need to look to the west of the Luton immediately and not as a longer term option.

- (iv) It is evident that there are potential delivery issues with the development of land to the North of Luton which is predicated on the construction of a link road between the M1 and A6 which by necessity crosses the Midland Main Line and requires the agreement of Network Rail. Although planning permission has recently been granted by Central Bedfordshire Council for the construction of the road, this decision is now the subject of judicial review proceedings. Furthermore, because of potential landscape impacts upon the Chilterns Area of Outstanding Natural Beauty (AONB) it is proposed to reduce the allocation from 4,000 to 3,100 dwellings and thereby reducing the extent of the contribution the site can make to meeting the identified needs of the HMA in any event. However, it is our clients understanding that this reduction in the scale of the allocation has

⁸ Representations on behalf of Abbey Land Developments, Central Bedfordshire Local Plan 2018 - JB Planning Associates

not overcome Natural England's objections in principle to the impact that this allocation has on the Chilterns AONB.

- (v) There is clear justification for the allocation of the land to the WOL and there may be a need to also include the allocation to the East of Luton in order to assist in meeting the unmet housing needs of Luton in locations that are close to where the housing need arises. This would not be achieved by the allocation of sites on the periphery of the HMA and some distance away from the Luton / Dunstable / Houghton Regis conurbation.

e) The Sustainability Appraisal does not consider land or sites outside of North Hertfordshire. Should it?

- 27. Against the backdrop of the interim findings reached by the Inspectors appointed to examine the Central Bedfordshire Local Plan the sustainability appraisal should consider growth scenarios which extend beyond the administrative boundary to North Hertfordshire. A holistic approach is required to assess the development needs within the Luton HMA, the boundary of which cuts across administrative boundaries. Such an approach would enable thorough consideration to be given to the implications of additional development upon statutory landscape designations, the Green Belt, other environmental constraints, accessibility, and the availability of public transport and to ensure that sustainable development is delivered.

Concluding Remarks

- 28. The Growth Option Study (**HOU7**) is a key evidence base documents that supports both the North Hertfordshire Local Plan and the Central Bedfordshire Local Plan. It presents an objective assessment of each of the Potential Growth Options (31 in total) in relation to deliverability, viability, environmental constraints and accessibility. Based on this evidence the West of Luton growth location is highly sustainable (Table 3.3) surpasses other sites.
- 29. There can be no doubt that the West of Luton site should be viewed as a reasonable alternative and our clients invite the Inspector to conclude, counter to the Council's evidence that the West of Luton:



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- Is an alternative growth location that does have strong links to Luton.
- Satisfies the fundamental requirement that it would meet Luton's housing needs close to where the need arises.
- Is the only Potential Growth Option that has a direct connection to High Quality Public Transport provided by the Luton Dunstable Guided Busway.
- Would result in less harm to the Green Belt compared with the other reasonable alternatives to the North and East of Luton.
- Finally, it is a realistic alternative option with a strong likelihood of being delivered to make a significant contribution to Luton's unmet needs

30. The Inspector is invited to conclude that West of Luton is a reasonable alternative.

957/JB/NW
27 February 2020



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Appendix 1

Table 1: Assessment findings for all locations

ID	Location name	Site area (ha)	Assumed density (dph)	Assumed total net capacity	Estimated net capacity to 2035	Estimated net capacity to 2031 within Luton HMA boundary	Overall deliverability (high / medium / low)	Overall viability (high / medium / low)	No. of secondary constraints present (0-17)	Public transport hub within 1.2 km? (rail stn, guided busway stop, park & ride)	% of location with 'relatively strong' or higher overall contribution to Green Belt
L1	Clophill	199.0	44	5,275	2,000	804	Low	High	9	No	0%
L2	Maulden East	31.5	30	566	566	521	Medium	High	6	No	0%
L3	Maulden South	12.0	30	216	216	216	Medium	High	4	No	29%
L4	Ampt Hill East	37.3	30	671	671	671	Medium	High	5	No	96%
L5	Flitwick West	89.7	44	2,368	2,368	1,500	High	Medium	8	Yes	99%
L6	North of Flitwick	51.3	55	1,693	1,500	900	High	Low	6	Yes	96%
L7	Flitwick East	19.6	55	648	648	648	High	Medium	6	Yes	99%
L8	Flitton	22.8	30	410	410	410	Medium	High	7	No	0%
L9	Gravenhurst	16.8	30	302	302	240	Low	High	4	No	0%
L10	Barton	444.5	44	11,736	2,000	924	Low	High	6	No	66%
L11	North of Harlington	33.0	30	593	593	593	High	High	4	Yes	99%
L12	Harlington West	143.0	55	2,961	2,500	1,500	High	High	7	Yes	98%
L13	Toddington	151.0	44	3,987	2,500	1,500	Low	High	8	No	79%
L14	Tebsworth	14.6	30	263	263	263	Medium	High	4	No	99%
L15	Hockliffe	108.5	44	2,865	2,500	1,500	Low	High	6	No	72%
L16	North of Leighton	405.7	44	10,710	2,500	120	Low	High	9	No	98%
L17	Leighton East	23.8	30	428	428	420	Medium	High	5	No	99%
L18	SE Leighton	50.3	30	905	905	720	Medium	Medium	6	No	99%
L19	Tilsworth	10.9	30	195	195	195	Medium	High	4	No	100%
L20	North Luton	308.5	44	8,150	3,000	2,000	High	High	5	No	90%
L21	Butterfield North	36.5	55	1,205	1,205	900	High	Medium	5	Yes	98%
L22	East Luton	116.5	30	2,100	2,100	2,100	High	Medium	5	No	99%
L23	Butterfield South	10.1	55	330	330	330	High	High	4	Yes	99%
L24	West Luton	299.4	55	9,884	2,500	1,500	High	High	7	Yes	88%
L25	Caddington NW	20.4	30	368	368	368	Medium	High	3	No	13%
L26	M1 J10	33.6	55	1,107	1,107	900	High	High	4	Yes	0%
L27	Harpenden	37.5	30	675	675	669	High	High	3	No	99%
L28	West Dunstable	117.1	44	3,093	2,000	1,200	Medium	Low	6	Yes	99%
L29	Eaton Bray East	22.8	30	411	411	411	Medium	High	5	No	99%
L30	Eaton Bray West	55.6	30	1,000	1,000	720	Medium	High	5	No	85%
L31	Eddlesborough	165.1	44	4,359	2,000	1,200	Low	High	3	No	0%
	Total net dwelling capacity			79,474	39,761	25,943					



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Appendix 2

Table 3.2 Services and facilities present within indicative walking distance of potential development locations

ID	Location name	Railway stations, guided busway stops and park and ride facilities (1.2 km)	Major employment areas (2.0 km)	Town centres and major out of centre retail parks (0.8 km)	Publicly accessible open spaces (1.2 km)	Secondary or upper schools and further or higher education establishments (2.0 km)	Lower, middle or primary schools (1.0 km)	Local / neighbourhood centres (0.4 km)	NHS primary healthcare (GPs) and hospitals (1.2 km)	Bus stops, inc. stops on non-guided sections of guided busway (0.8 km)
L1	Clophill	No	No	No	Yes	No	Yes	No	No	Yes
L2	Maulden East	No	Yes	No	Yes	No	Yes	No	No	Yes
L3	Maulden South	No	Yes	No	Yes	Yes	Yes	No	Yes	Yes
L4	Amphill East	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
L5	Flitwick West	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
L6	North of Flitwick	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
L7	Flitwick East	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
L8	Flitton	No	Yes	No	Yes	No	Yes	No	No	Yes
L9	Gravenhurst	No	No	No	Yes	No	Yes	No	No	Yes
L10	Barton	No	No	No	Yes	Yes	Yes	No	Yes	Yes
L11	North of Harlington	Yes	No	No	Yes	Yes	Yes	No	No	Yes
L12	Harlington West	Yes	Yes	No	Yes	Yes	Yes	No	No	Yes
L13	Toddington	No	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
L14	Tebsworth	No	No	No	Yes	No	No	No	No	Yes
L15	Hockliffe	No	No	No	Yes	No	Yes	No	No	Yes
L16	North of Leighton	No	Yes	No	Yes	Yes	Yes	No	No	Yes
L17	Leighton East	No	Yes	No	Yes	Yes	Yes	No	No	Yes
L18	SE Leighton	No	Yes	No	Yes	Yes	Yes	No	No	Yes
L19	Tilsworth	No	Yes	No	Yes	No	Yes	No	No	Yes
L20	North Luton	No	Yes	No	Yes	Yes	Yes	No	Yes	Yes
L21	Butterfield North	Yes	Yes	No	Yes	Yes	No	No	No	Yes
L22	East Luton	No	Yes	No	Yes	Yes	Yes	No	Yes	Yes
L23	Butterfield South	Yes	Yes	No	Yes	Yes	Yes	No	Yes	Yes
L24	West Luton	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
L25	Caddington NW	No	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
L26	M1 J10	Yes	Yes	No	Yes	Yes	Yes	No	No	Yes
L27	Harpenden	No	No	No	No	Yes	Yes	No	Yes	Yes
L28	West Dunstable	Yes	Yes	No	Yes	Yes	Yes	No	Yes	Yes
L29	Eaton Bray East	No	No	No	Yes	No	Yes	Yes	Yes	Yes
L30	Eaton Bray West	No	No	No	Yes	No	Yes	Yes	Yes	Yes
L31	Eddlesborough	No	No	No	Yes	No	Yes	No	Yes	Yes

Extract from Growth Options Study, 2017 - Table 3.2: Services and facilities present within indicative walking distance

ID	Location Name	Railway stations, guided busway stops and park and ride facilities (1.2 km)	Major employment areas (2.0 km)	Town centres and major out of centre retail parks (0.8 km)	Publicly accessible open spaces (1.2 km)	Secondary or upper schools and further or higher education establishments (2.0 km)	Lower, middle or primary schools (1.0 km)	Local / neighbourhood centres (0.4 km)	NHS primary healthcare (GPs) and hospitals (1.2 km)	Bus stops, inc stops on non-guided sections of busway (0.8 km)
L22	East Luton	No	Yes	No	Yes	Yes	Yes	No	Yes	Yes
L20	North Luton	No	Yes	No	Yes	Yes	Yes	No	Yes	Yes
L24	West Luton	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

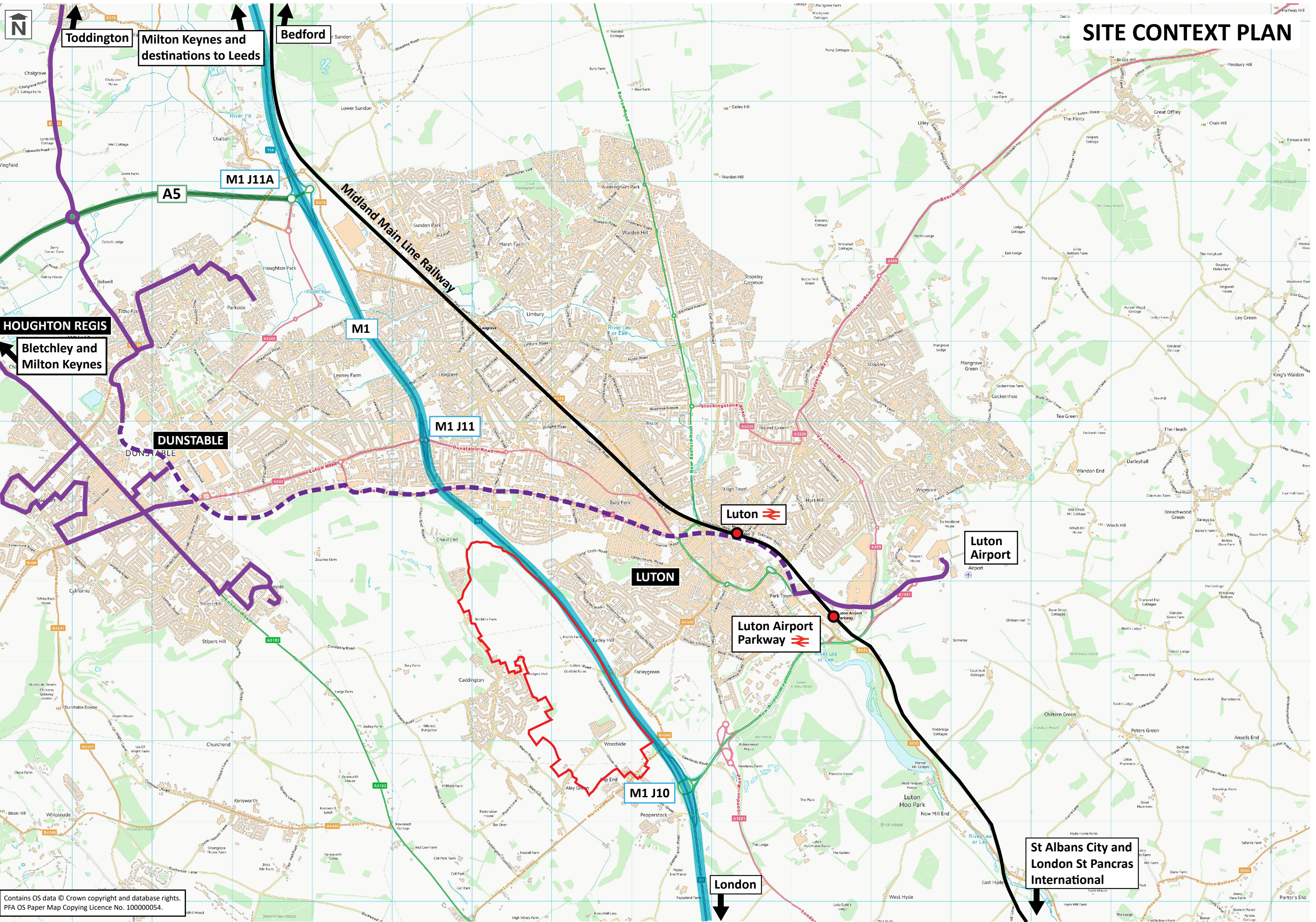


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Appendix 3

SITE CONTEXT PLAN



Toddington
Milton Keynes and destinations to Leeds

Bedford

HOUGHTON REGIS
Bletchley and Milton Keynes

DUNSTABLE

Luton

Luton Airport

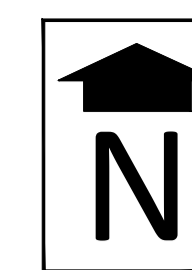
Luton Airport Parkway

LUTON

St Albans City and London St Pancras International

London

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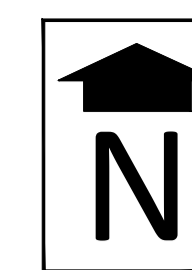
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KEY

- Principle Bus Route
- Secondary Bus Route



Rev #	Date	Description	Drawn	Check
1	25/04/19	First Issue	RH	JA
Status				
PRELIMINARY				
Client				
Gladman Developments				
Project				
Land West of Luton				
Drawing Title				
Bus Strategy				
Drawing No.				
G289/12				
Date: April 2019		Scale: Not Drawn to Scale		
E-Mail: jalexander@pfapl.com				



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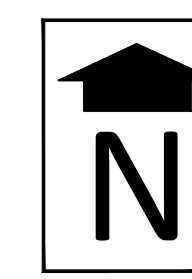
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KEY

- Principle Bus Route
- - - Secondary Bus Route



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Status				
PRELIMINARY				
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Project				
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Drawing Title				
Pedestrian Strategy				
Drawing No.				
G289/10				
Date: April 2019		Scale: Not Drawn to Scale		
E-Mail: jalexander@pfapl.com				



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KEY

- Transport Corridor
- Development Roads
- Pedestrian/cyclist links



Rev #	Date	Description	Drawn	Check
1	25/04/19	First Issue	RH	JA

Status: **PRELIMINARY**

Client: **Gladman Developments**

Project: **Land West of Luton**

Drawing Title: **Overarching Access Strategy**

Drawing No.: **G289/09**

Date: April 2019 Scale: Not Drawn to Scale

E-Mail: jalexander@pfapl.com



North Hertfordshire Local Plan Examination

Matter 24 - the proposed 'East of Luton' sites: Statement on behalf of Abbey Land Developments Limited

Appendix 4

Table 3.3 Contribution to Green Belt purposes of potential development locations

ID	Location name	GB study parcel ID	P1 - Restricting sprawl	P2 - Preventing merging	P3 - Safeguarding countryside	P4 - Preserving setting	Overall contribution to GB purposes	Parcel % of location area
L3	Maulden South	AH1	none or weak	none or weak	relatively strong	relatively strong	relatively strong	29.0
L4	Ampthill East	AH1	none or weak	none or weak	relatively strong	relatively strong	relatively strong	87.0
L4	Ampthill East	AH2	none or weak	relatively strong	relatively strong	relatively strong	relatively strong	9.0
L5	Flitwick West	FW4	none or weak	relatively weak	strong	relatively weak	strong	71.0
L5	Flitwick West	FW5	none or weak	relatively strong	moderate	none or weak	relatively strong	28.0
L6	North of Flitwick	FW1	none or weak	relatively strong	moderate	relatively weak	relatively strong	79.0
L6	North of Flitwick	AH2	none or weak	relatively strong	relatively strong	relatively strong	relatively strong	17.0
L7	Flitwick East	FW2	none or weak	none or weak	relatively strong	relatively weak	relatively strong	99.0
L10	Barton	BC2	none or weak	none or weak	strong	none or weak	strong	44.0
L10	Barton	BC1	none or weak	none or weak	strong	none or weak	strong	22.0
L11	North of Harlington	WE2	none or weak	relatively weak	relatively strong	none or weak	relatively strong	98.0
L11	North of Harlington	WE1	none or weak	none or weak	relatively strong	none or weak	relatively strong	1.0
L12	Harlington West	H3	none or weak	relatively weak	relatively strong	none or weak	relatively strong	76.0
L12	Harlington West	WE2	none or weak	relatively weak	relatively strong	none or weak	relatively strong	12.0
L12	Harlington West	H1	none or weak	relatively weak	strong	none or weak	strong	10.0
L13	Toddington	T2	none or weak	none or weak	strong	none or weak	strong	53.0
L13	Toddington	T3	none or weak	none or weak	strong	relatively weak	strong	25.0
L13	Toddington	T4	none or weak	none or weak	moderate	none or weak	moderate	19.0
L13	Toddington	A	relatively weak	relatively strong	strong	none or weak	strong	1.0
L14	Tebsworth	A	relatively weak	relatively strong	strong	none or weak	strong	97.0
L14	Tebsworth	HL3	none or weak	none or weak	strong	none or weak	strong	2.0
L15	Hockliffe	HL3	none or weak	none or weak	strong	none or weak	strong	57.0
L15	Hockliffe	HL2	none or weak	none or weak	moderate	none or weak	moderate	25.0
L15	Hockliffe	F	strong	relatively strong	strong	none or weak	strong	14.0
L15	Hockliffe	HL1	none or weak	none or weak	relatively strong	moderate	relatively strong	1.0
L16	North of Leighton	H	none or weak	relatively weak	strong	relatively strong	strong	42.0
L16	North of Leighton	LL7	strong	moderate	strong	moderate	strong	34.0
L16	North of Leighton	LL6	strong	relatively weak	strong	moderate	strong	21.0
L16	North of Leighton	HAR2	none or weak	none or weak	relatively strong	none or weak	relatively strong	1.0
L17	Leighton East	LL8	strong	moderate	strong	relatively strong	strong	56.0
L17	Leighton East	LL7	strong	moderate	strong	moderate	strong	43.0
L18	SE Leighton	LL8	strong	moderate	strong	relatively strong	strong	99.0
L19	Tilsworth	F	strong	relatively strong	strong	none or weak	strong	100.0
L20	North Luton	L2	relatively strong	relatively weak	strong	relatively strong	strong	76.0
L20	North Luton	L1	strong	none or weak	moderate	relatively strong	strong	9.0
L20	North Luton	L3	strong	none or weak	strong	relatively strong	strong	5.0

ID	Location name	GB study parcel ID	P1 - Restricting sprawl	P2 - Preventing merging	P3 - Safeguarding countryside	P4 - Preserving setting	Overall contribution to GB purposes	Parcel % of location area
L21	Butterfield North	L4	strong	none or weak	strong	strong	strong	97.0
L21	Butterfield North	2	strong	none or weak	strong	none or weak	strong	1.0
L22	East Luton	2c	strong	none or weak	strong	none or weak	strong	80.0
L22	East Luton	2d	strong	none or weak	strong	none or weak	strong	19.0
L23	Butterfield South	2	strong	none or weak	strong	none or weak	strong	99.0
L24	West Luton	L6	relatively strong	none or weak	moderate	relatively strong	relatively strong	55.0
L24	West Luton	C1	relatively strong	none or weak	relatively strong	relatively weak	relatively strong	33.0
L24	West Luton	SE2	moderate	none or weak	moderate	none or weak	moderate	11.0
L25	Caddington NW	C4	none or weak	none or weak	moderate	relatively weak	moderate	86.0
L25	Caddington NW	D5	strong	none or weak	strong	strong	strong	13.0
L26	M1 J10	SE1	moderate	none or weak	moderate	none or weak	moderate	99.0
L27	Harpenden	HP1	none or weak	relatively weak	relatively strong	none or weak	relatively strong	93.0
L27	Harpenden	C	none or weak	relatively strong	strong	moderate	strong	6.0
L28	West Dunstable	D1	strong	moderate	strong	none or weak	strong	99.0
L29	Eaton Bray East	EB2	none or weak	moderate	relatively strong	none or weak	relatively strong	99.0
L30	Eaton Bray West	EB1	none or weak	relatively weak	strong	none or weak	strong	85.0



North Hertfordshire Local Plan Examination

Matter 24 - the proposed 'East of Luton' sites: Statement on behalf of Abbey Land Developments Limited

Extract from Growth Options Study, 2017 - Table 3.3: Contribution to Green Belt Purposes

ID	Location name	GB Study Parcel ID	P1 – Restricting Sprawl	P2 – Preventing Merging	P3 – Safeguarding Countryside	P4 – Preserving Setting	Overall Contribution to GB Purposes	Parcel % of Location Area
L22	East Luton	2c	Strong	None or Weak	Strong	None or Weak	Strong	80.0
L22	East Luton	2d	Strong	None or Weak	Strong	None or Weak	Strong	19.0
L20	North Luton	L2	Relatively Strong	Relatively Weak	Strong	Relatively Strong	Strong	76.0
L20	North Luton	L1	Strong	None or Weak	Moderate	Relatively Strong	Strong	9.0
L20	North Luton	L3	Strong	None or Weak	Strong	Relatively Strong	Strong	5.0
L24	West Luton	L6	Relatively Strong	None or Weak	Moderate	Relatively Strong	Relatively Strong	55.0
L24	West Luton	C1	Relatively Strong	None or Weak	Relatively Strong	Relatively Weak	Relatively Strong	33.0
L24	West Luton	SE2	Moderate	None or Weak	Moderate	None or Weak	Moderate	11.0

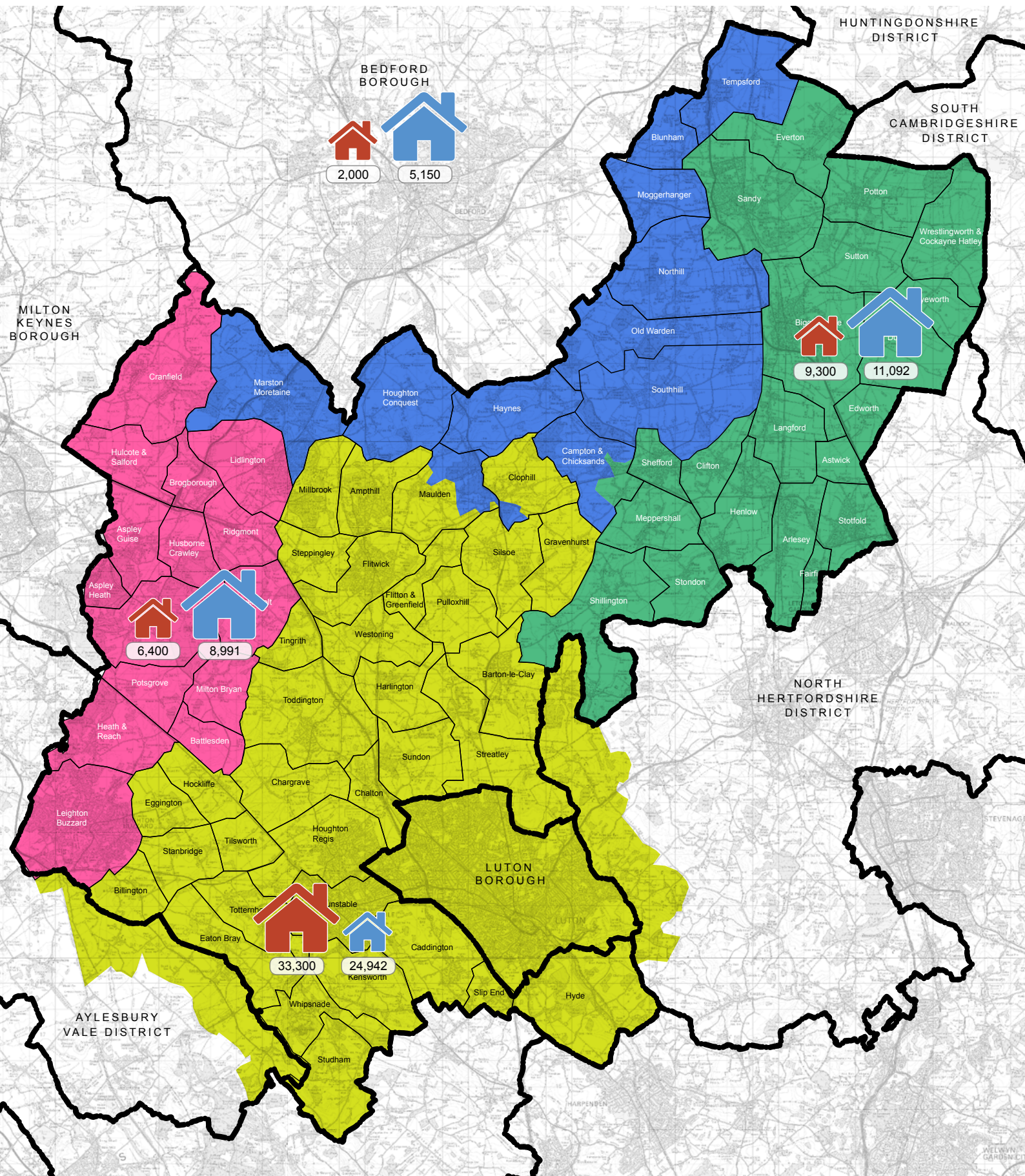
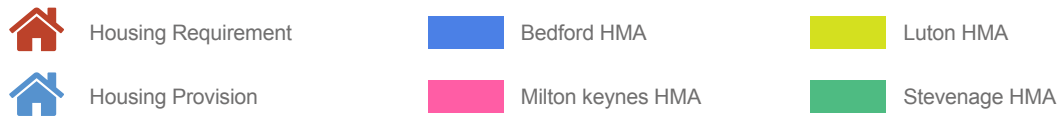


North Hertfordshire Local Plan Examination

Matter 24 - the proposed 'East of Luton' sites: Statement on behalf of Abbey Land Developments Limited

Appendix 5

Figure 3: Proposed Housing Distribution by Housing Market Area





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