



BRICKKILN

**Planning Statement
December 2009**

Brickkiln

Planning Statement

Bloor Homes

December 2009

Authorised for and on behalf NJL Consulting LLP



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EXECUTIVE SUMMARY

1. NJL Consulting have prepared a planning statement in support of the Brickkiln development, which is located to the south of Cockernhoe and east of Wigmore.
2. The Brickkiln proposal includes the provision of up to 1,000 new dwellings, of which 40% will be affordable. The proposal also includes the provision of community facilities including a new primary school, local centre, community hall, formal and informal open space, new footpaths and cycleways.
3. The housing provision will contribute towards the MKSMSRS Minimum Housing Requirements for 2001-2021. Having conducted a thorough review of the expected housing completions within Luton and South Bedfordshire over the next 5 years, there is considered to be only a 3 years supply of housing within the area.
4. PPS 3 Housing makes it clear that if an up-to-date 5 year supply of housing sites can not be demonstrated, then planning applications for housing should be considered favourably.
5. This will enhance the landscape setting, provide new wildlife habitats and enhance the access for visitors with improved information and educational resources.
6. The inability to demonstrate an up-to-date 5 year supply of housing constitutes one of the very special circumstances relating to this proposal.
7. A further very special circumstance is that 40% of the dwellings proposed will be made affordable, which goes beyond the most up to date policy requirements for affordable provision. This is a significant amount of affordable housing with a significant proportion being intended for families.
8. A management plan for a large part of Putteridge Bury Registered Park and Gardens is also included. The provision of a Management Plan is an additional very special circumstance for Brickkiln.
9. The proposal also offers significant structural landscape and wildlife habitat enhancements which will benefit the site and surrounding area. A considerable amount of formal and informal open space will be provided, along with reinforced green corridors. This forms a further very special circumstance of the proposal.
10. A full assessment of the Development Plan and other policy considerations has been undertaken, which ensures that the proposal adheres to relevant planning policies.

11. Brickkiln is a suitable, deliverable and available development which will meet a proven immediate need for housing. Therefore, we respectfully request that this planning application is supported by the Council, and is approved accordingly.

1.0 INTRODUCTION

INTRODUCTION

- 1.1 This Planning Statement has been prepared by NJL Consulting on behalf of JS Bloor (Northampton) Limited (hereafter referred to as 'Bloor Homes'), to support the accompanying planning application for a major new development on land to the south of Cockernhoe and east of Wigmore, known as 'Brickkiln'. The application seeks consent for a mixed use sustainable development incorporating new housing (up to 1,000 units), and the provision of community facilities including a new primary school, local centre, community hall, formal and informal open space, new footpaths and cycleways.
- 1.2 The Milton Keynes & South Midlands Sub Regional Strategy (MKSMSRS) was published in March 2005 with the purpose of providing a clear, agreed sub-regional strategy for the period 2001-2021.
- 1.3 The MKSMSRS has set a target for a minimum of 26,300 new dwellings to be built within the Luton, Dunstable, Houghton Regis and Leighton Linlade area between 2001-2021. Within the MKSMSRS it recommends that a comprehensive review of the green belt areas is undertaken, and that urban extensions should come forward first in areas that are not constrained by the requirement for strategic infrastructure to be in place (MKSMSRS, para 87).
- 1.4 It also identifies that the objective of this, **'is to ensure that construction can start at one or more of the urban extensions by 2009'** (MKSMSRS, para 88) (NJL bold and underlining).
- 1.5 The application site is strategically located to the east of the Luton conurbation in an area recognised within the Luton and South Bedfordshire Joint Committee Core Strategy: Preferred Options Summary Document (April 2009) as a Sustainable Urban Extension (SUE) growth area.
- 1.6 Thirteen areas were identified as having potential as strategic mixed-use urban extensions in the Luton and South Bedfordshire Joint Committee Core Strategy: Issues and Options Paper (June 2007). A variety of evidence based documents were produced, such as a Transport Modelling and Accessibility Study (Halcrow, March 2009) and a Housing Land Availability Studies (Luton 2007 and South Bedfordshire 2008). A Site Assessment Matrix for the 13 sites, which assessed each site against a series of social, economic and environmental criteria was also produced in April 2009.
- 1.7 From this evidence based review, four preferred strategic directions of growth emerged, known as SUEs, were identified. The Brickkiln development is located within the SUE known as East of Luton.

- 1.8 The emerging SUE's will assist in the delivery of the housing targets for the MKSMSRS area. The application site therefore, sits within a location which has been formally acknowledged as an extension area.

SITE AND SURROUNDING AREA

- 1.9 The Brickkiln development site is approximately 63 hectares (Ha) in area and is located in the North Hertfordshire District to the east of the Luton conurbation. The site is bounded by: the residential district of Wigmore to the west; Luton Road, fields or back gardens and Chalk Hill to the northwest of the site; woods and fields to the east and northeast of the site; and Darley Road/Lower Road to the southeast of the site.

COMMUNITY CONSULTATION

- 1.10 Bloor Homes began community engagement in January 2008, for a larger development in the area. This smaller application sits entirely within the area used for consultation purposes.
- 1.11 The community engagement followed best practice principles as set out in NHDC's Statement of Community Involvement (adopted July 2007) and included a series of public exhibitions and a community website and telephone hotline was established for residents and stakeholders.
- 1.12 In addition Bloor Homes has been liaising with officers of North Hertfordshire District Council, Hertfordshire County Council, Luton Borough Council, the Luton and South Bedfordshire Joint Committee and GO East to establish issues affecting the site and its promotion through the Local Development Framework process. This consultation has helped informed the evolution of the masterplan for the site.

TYPE OF APPLICATION

- 1.13 The application seeks outline planning permission controlled by parameters. As such, the submission includes fixed maximum parameters for certain key elements of the scheme which will be adhered to in subsequent reserved matters applications. This is an established approach to schemes where core principles can be set in the first instance and thereafter detailed design developed. This enables the Local Planning Authority to have control over detailed design works of all elements of the scheme.

DESCRIPTION OF THE PROPOSAL

- 1.14 This application seeks outline planning permission for:

“Mixed use sustainable development incorporating residential, educational and community facilities (A1-A5, C3, D1), associated roads; open space; green infrastructure and ancillary facilities – in outline”.

- 1.15 All matters will be reserved (siting, design, external appearance, means of access and landscaping) for consideration as part of later reserved matters applications.

- 1.16 The application includes a level of detail beyond the minimum requirements of an outline application as it seeks to set fixed maximum parameters and quantum of development which must be complied with at reserved matters stage. The proposed development seeks to provide sustainable and affordable housing.
- 1.17 The proposals have been divided into a variety of zones as shown within the Parameter Plan and within the accompanying Design & Access Statement.

PARAMETER PLAN

- 1.18 Parameters are used in outline applications as they can define key elements of the proposals whilst retaining flexibility in the precise details of development, which can be developed through reserved matters applications.
- 1.19 The controlling parameters presented in this application will be used as the basis on which outline planning permission is approved. However, this does not constitute a full planning consent and development cannot commence until reserved matters applications (the detail of the outline application) have been submitted and approved.
- 1.20 There is only a single combined Parameter Plan being submitted as part of the application and this is shown in Appendix 1. To assist in explaining the parameters here though, they are described separately below.

SITE BOUNDARY

- 1.21 Appendix 1 and the accompanying red line plan illustrates the site boundary for the purposes of the planning application, within which development, highway works and landscaping enhancements are proposed to take place.

ACCESS

- 1.22 The Parameter Plan identifies the main access points for cars, public transport routes, improvements to the Chiltern Way and pedestrian and cycle routes.
- 1.23 The main vehicle access will be off Luton Road which links into Luton via Crawley Green Road and a bus only access onto Darley Road which links into Luton via Eaton Green Road south of Wandon End. A vehicle access north of Wandon End onto Lower Road is also shown to serve the final phase of the development only.
- 1.24 A new link or relief road from Luton Road to Chalk Hill is proposed to avoid development traffic or construction traffic passing through Cockernhoe. Traffic controls are proposed on Brick Kiln Lane to enable existing traffic movements but restricted development traffic and additionally bus gates are proposed to control the access onto Darley Road.
- 1.25 The car parking areas for the school and local centre will provide for a sufficient number of spaces in line with Hertfordshire County Council's Car Parking Standards as well as covered cycle parking spaces. The internal layout and circulation will be determined through reserved matters applications.

ZONAL LAND USE & HOUSING DENSITY

1.26 The Parameter Plan sets zonal land use and includes proposed residential densities to establish the broad location and physical extent of each particular land use element of the application together with proposed densities. The land use zones are summarised in table 1.

Table 1: Land Use Zones

Table 1 : Land Use Zones	
Residential	Areas allocated for residential use of up to 1000 dwellings, with residential densities ranging from 30-40 dwellings per hectare.
Local Centre	Area allocated for the local centre which will comprise a number of retail units of flexible size and uses (A1-A5 use classes), a Community Hall and other community facilities. A small number of flats are proposed above the units in the local centre. Car parking and covered cycle bays will be provided.
Educational Facility	A location for a new Primary School is identified, located towards the north of the site near the existing settlement of Cockernhoe. The site is sufficient for new school buildings, outdoor play areas and car parking.
Open Space	Areas have allocated for open space both formal and informal, which will include play areas, surface water drainage attenuation features and new allotments.
Vegetation	Vegetation to be retained (woodland and hedgerows) and new areas of structural planting are identified. The structural planting will provide new woodland to supplement the existing woods around the site and new hedgerows.

BUILD HEIGHTS

1.27 The maximum building heights (in terms of number of storeys) proposed are shown on the Parameter Plan and range from less than 2 storeys up to 3 storeys for the residential land use, up to 3 storeys in the local centre and up to 2 storeys for the primary school.

QUANTUM OF DEVELOPMENT

1.28 A summary of the maximum quantum of proposed development that is being applied for is listed below.

- Housing – up to 1,000 dwellings;
- Primary School – up to 2.5 hectares in area;

- Local Centre – up to 1.2 hectares in area to include A1-A5 uses for retail (up to 8,500 sq.ft total gross floor area (GFA) in area for all uses) and Community Facilities (between 1,000 and 5,000 sq.ft GFA);
- Open space – up to 12 hectares;
- Allotments – up to 0.9 hectares.

ILLUSTRATIVE PLANS

1.29 In addition to the parameter plans the sections below describe the illustrative plans that are also included to indicate how development may be built.

ILLUSTRATIVE MASTERPLAN

1.30 Based on the parameters set out above, an Illustrative Masterplan has been prepared to show how the proposed development can come forward within the constraints of land use zones, residential densities, building heights and access arrangements.

INDICATIVE PHASING PLAN

1.31 As described in detail within the accompanying Design and Access Statement an indicative phasing plan showing the proposed development phased over five phases. This is reproduced in Appendix 2 of this document.

1.32 A more detailed description of the phasing and delivery of the scheme are covered within Chapter 2 of this statement.

STRUCTURE OF STATEMENT

1.33 The planning statement contains 9 chapters which cover all planning aspects relevant to this type of proposal, as follows;

- Chapter 1 provides an introduction to the proposal and application.
- Chapter 2 sets out how deliverable the proposed development is and Bloor's commitment to deliver the housing numbers.
- Chapter 3 provides the case for very special circumstances to allow the proposals to be granted planning consent.
- Chapter 4 looks at the sustainability credentials of the proposed scheme.
- Chapter 5 provides a justification for the housing element of the scheme along with a summary of the Housing Assessment Paper (Appendix 3). It also considers the strategic and local need for this type of development, and proposes the case for very special circumstances.

- Chapter 6 provides an assessment of the retail element of the scheme.
- Chapter 7 provides a Technical Summary of the additional supporting documentation related to this planning application.
- Chapter 8 presents a summary of how the scheme conforms to the relevant national, regional and local planning policy documents. A policy checklist of how the proposal conforms to policy is also provided in Appendix 4.
- Chapter 9 provides an overall summary and conclusion of the scheme and all of the key issues within the previous chapters.

SUPPORTING DOCUMENTS

1.34 This Statement should be read in conjunction with the outline planning application and the following supporting documents:

- Plans Pack
- Design and Access Statement
- Environmental Statement
- Statement of Community Involvement
- Transport Assessment
- Sustainability Strategy

2.0 SITE DELIVERABILITY

DELIVERABILITY & COMMITMENT

- 2.1 The need and demand for housing is high within this locality. It is therefore considered that the proposed development to the east of Luton is needed to help meet the immediate housing requirement to 2014.
- 2.2 The proposal can best be described as an extension to, but with its own identity, the Luton urban area, which can be delivered, as it is viable, suitable and available and does not require major infrastructure to support the development.
- 2.3 Environmental and landscape sensitivities have been reviewed and there are no landownership, physical, environmental constraints associated with the proposals. The proposals include landscape enhancements and increased public access to large areas of Putteridge Bury Park and Gardens.
- 2.4 Distributing housing in a location which is easily accessible and well connected to existing public transport and community facilities and services is as advocated by PPS3 Housing as per the reference below:
- “it is necessary to identify and explore a range of options for distributing housing including the role of growth areas, new free-standing settlements, major urban extensions....and/or where necessary, review of any policy constraints”* (paragraph 37, PPS3)
- 2.5 Providing green infrastructure is an important element of the proposed development. A Green Infrastructure Framework Strategy has been submitted in support of the application and is described in detail within the Environmental Statement (Chapter 5) and the Design and Access Statement.
- 2.6 The proposed development does not require major infrastructure to deliver the housing and consequently can achieve early delivery of houses in an area with an identified shortfall.
- 2.7 The entire application site is also controlled by Bloor Homes.
- 2.8 Given that no major infrastructure requirements are necessary for development to commence, the site represents an immediate opportunity to secure new housing development. This proposal will also help to contribute towards achieving the overall housing requirements contained within the MKSMSRS which envisages a start on site on urban extension areas by 2009.

PHASING

- 2.9 The overall phased delivery of this scheme has been taken into consideration during the pre-application stages. An indicative phasing programme has been devised to

illustrate how the components of the scheme could be delivered. (This is illustrated in Appendix 2). A summary of each phase is provided below.

Phase 1 –24 months after planning consent

- 2.10 Phase 1 will deliver approximately 200 new dwellings. This phase will also provide the main site access, formal open space and sports facilities, a local centre and a school. To the north of Brickkiln new woodland will be planted strengthening the existing mature woodland blocks.
- 2.11 A link road from Luton road to Chalk Hill will be provided to avoid construction or development traffic passing through Cockernhoe.

Phase 2a – 12 months after completion of Phase 1

- 2.12 Phase 2a will deliver approximately 190 units. This phase will also build upon the existing linear open space to the edge of Luton, ensuring the amenity of existing residents is not unduly affected.

Phase 2b – 12 months after completion of Phase 1

- 2.13 Phase 2b will incorporate up to 85 dwellings to be provided on the site, providing a total of up to 475 new dwellings upon completion of phase 2. This phase will also form further areas of open space for play and informal recreation and allotments. A bus access will be formed onto Darley Road linking Crawley Green Road and Eaton Green Road.

Phase 3a: 12 months after completion of Phase 2

- 2.14 During this phase, approximately 325 dwellings will be completed to provide a total of up to 800 new dwellings at the site.

Phase 3b: 12 months after completion of Phase 3a

- 2.15 Phase 3b represents the final phasing stage of this proposal. During this phase approximately 200 dwellings will be provided, which will accumulate to a total of up to 1,000 dwellings.

PHASING CONDITIONS

- 2.16 A phasing condition could be attached to the planning permission to ensure that the development comes forward in accordance with the proposed phases identified above.
- 2.17 Below is a draft phasing condition which could be used;

‘A detailed programme of phasing for the development shall be submitted to and approved in writing by the Local Planning Authority before the development is

begun. The phasing programme shall provide for no more than 5 distinct phases and shall include;

- *A plan defining the extent of the works comprised within each phase*
- *The amount of floorspace, broken down by use, and the number of residential units to be completed within each phase.*
- *The infrastructure works to be included within each phase, including works within the existing highway.*
- *A timetable for the implementation of works within each phase'*

2.18 The submission of a detailed programme of phasing for the development will ensure that all details relating to the delivery of the scheme are addressed prior to the commencement of construction at the site.

2.19 A further list of draft conditions which could be applied to this application are contained within Appendix 5.

S106 CONTRIBUTION

2.20 As part of this planning submission we have provided a draft s106 Heads of Terms (Appendix 6). The purpose of this document is to serve as a live record of Heads of Terms for the proposed Section 106 Agreement which may be required to be entered into prior to planning permission being granted for the proposed development.

2.21 We anticipate that the s106 Agreement could include the following elements;

- Highway/Infrastructure Requirements
- Education Provision
- Affordable Housing
- Community Infrastructure

2.22 Prior to the determination of the application, we will liaise with North Hertfordshire District Council to ensure an appropriate s106 Agreement for the proposal, and that appropriate elements are included to reflect guidance on the use of s106 Agreements and/or conditions.

3.0 THE CASE FOR VERY SPECIAL CIRCUMSTANCES

- 3.1 The proposed development is located on land in the Green Belt. Specific guidance on the general presumption against inappropriate development within a Green Belt is provided in PPG2. It states that inappropriate development should not be approved, except in very special circumstances:
- 3.2 *“Inappropriate development is, by definition, harmful to the Green Belt. It is for the applicant to show why permission should be granted. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and other harm, is clearly outweighed by other considerations.” (paragraph 3.2).*
- 3.3 This section of the Chapter sets out why the development can be justified by very special circumstances and consequently why permission should be granted.

PPG2 - GREEN BELT

Harm and Impact on the Purposes of the Green Belt

- 3.4 The five purposes of including land in the Green Belt as identified within PPG 2 are:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns from merging into on another;
 - To assist and safeguard the countryside form encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration by encouraging the recycling of derelict and other open land
- 3.5 The Brickkiln proposals are located within Green Belt and the development must therefore, be considered against these five purposes. The key consideration is whether or not the proposals would impinge upon the purposes of including land in within the Green Belt as stated above. Each of these tests are reviewed below;

To check the unrestricted sprawl of large built up-areas

- 3.6 The site is located within a large expanse of green belt in an area of countryside comprising of villages, farmland and rural businesses immediately adjacent to a residential urban area. The proposals will play a positive role in providing more opportunities for outdoor sport and recreation near where people live and in an area which has a formal open space deficiency. The proposals will provide approximately 12 hectares of formal and informal open space.
- 3.7 The proposals also offer significant landscaping enhancements, including the installation of new areas of structure planting, notably to the northern and southern extremities of the site. A wide strip of public open space bordering the eastern edge

of Luton and Wigmore is also proposed. The inclusion and location of the open space will provide a structured development with clearly defined boundaries. It will provide strong green boundaries and therefore restrict urban sprawl.

To prevent neighbouring towns from merging into one another

- 3.8 The nearest neighbouring towns to the proposals are Hitchin and Stevenage located 5 miles to the east of the application site. The size and location of the development (adjacent to the urban fringe of Luton) and the distance between it and neighbouring towns will prevent it from merging with other towns. The scale of the proposals is minimal in regard to the existing settlements of Luton, Hitchin and Stevenage. The proposal will also allow defensive boundaries to be formed and defined, which will assist in the prevention of neighbouring towns merging into one another. There is no realistic proposition of such an event happening.

To assist in safeguarding the countryside from encroachment

- 3.9 The proposals safeguard the countryside by retaining and enhancing important ancient woodland and hedgerows that provide the structure to the landscape. The proposed Management Plan for a large part of Putteridge Bury Registered Park and Gardens will enhance and help to safeguard this key element of the countryside, as well as increasing its accessibility to visitors. Existing green corridors located within the site will also be reinforced. Enhancements of the existing woodland areas are proposed, particularly to the eastern and north-east site boundaries. The proposals will significantly enhance the existing landscape within the site and surrounding area, providing further defensible boundaries for the site.
- 3.10 A total of 12ha of green open space will be created, increasing the opportunities to access the countryside.

To preserve the setting and special character of historic towns

- 3.11 This purpose of the green belt is not of relevance to this proposal. Within the application site and the immediate surrounding area there are no historic towns.

To assist in urban regeneration, by encouraging the recycling of derelict and other land

- 3.12 The MKSMSRS, which is part of the overall Development Plan, acknowledges that to achieve the housing targets in this locality, not all housing can be delivered in existing urban areas. There is an identified need such that other locations are required without in anyway prejudicing the ongoing regeneration aims of the Luton urban area to assist in the delivery of housing. The MKSMSRS recommends that a comprehensive review of the green belt areas is undertaken, and that urban extensions should come forward first in areas that are not constrained by the requirement for strategic infrastructure to be in place (MKSMSRS, para 87).
- 3.13 The new community which will be created will stimulate further economic input into the Luton urban economy, through increased expenditure and use of facilities.

- 3.14 The delivery of this site is therefore necessary in achieving these targets, as well as being consistent with the policy approach in PPS 3.

Judgement on Harm

- 3.15 Having considered the purposes of including land within the Green Belt, we conclude that the Brickkiln development will have limited harm upon the Green Belt. This proposal provides an opportunity for a new development which will bring significant benefits to the local and surrounding areas.
- 3.16 Therefore, the principle of development outweighs the perceived harm to the Green Belt.

VERY SPECIAL CIRCUMSTANCES

- 3.17 The very special circumstances for this proposal are;

- Existing Housing Shortfall over 5 years
- Significant Affordable housing provision
- Provision of a Putteridge Bury Management Plan
- Significant Landscape enhancements

ACCORDANCE WITH THE DEVELOPMENT PLAN

- 3.18 In this case, the Development Plan comprises the Regional Spatial Strategy for the East of England (RSS), published in May 2008 the MKSMSRS published in 2005 and the saved policies of the NHDC Local Plan (September 2007).
- 3.19 It is considered that the Development Plan policies most relevant to the proposals area those set out in the RSS and the MKSMSRS as they are the most recent. According to the MKSMSRS, some 26,300 new house need to be accommodated in and around Luton by 2021 with a further 15,400 between 2021 and 2031.
- 3.20 Policy provision for the principle of reviewing the Green Belt boundary in Luton and Hertfordshire is incorporated in the MKSMSRS.
- 3.21 To accommodate this growth, the MKSMSRS recognises the need for a comprehensive review of the Green Belt areas and states that **urban extensions should come forward first in areas that are not constrained by the requirement for strategic infrastructure to be in place (para 87, MKSMSRS). It also identifies that the objective of this, 'is to ensure that construction can start at one or more of the urban extensions by 2009' (para 88, MKSMSRS).** (NJL Bolding and underlining).

- 3.22 There is a need therefore for the early release of Green Belt land for the development of housing to ensure that the housing requirements within the MKSMSRS are met, which forms part of the Development Plan.

ACCORDANCE WITH PPS3

- 3.23 The primary material consideration that we consider outweighs conflict with PPG2 relates to housing matters and accordance with PPS3 Housing.
- 3.24 PPS3 requires local planning authorities to identify and maintain a rolling 5 year land supply of deliverable land for housing. From analysing the evidence base (i.e. Luton and South Bedfordshire JTU SHLAA, April 2009) our housing studies have concluded that a minimum 5 year supply of sites cannot be demonstrated. The advice given in PPS3 when this circumstance applies is that planning applications for housing should be considered favourably, having regard to other policies in that Statement.

Reason 1 - Housing Shortfall

- 3.25 There is a current shortfall of approximately 2891 dwellings against the MKSMSRS minimum housing completion requirements for the area. This equates to an overall housing land supply of 3.2 years. We have found that only 5200 dwellings can be delivered by 2014. The Brickkiln proposal will help deliver up to a 1,000 dwellings, during the immediate housing supply period.
- 3.26 Again, one of the objectives of achieving the housing targets within the MKSMSRS '*is to ensure that construction can start at one or more of the urban extensions by 2009*' (MKSMSRS, para 88). Thus far none of the SUEs have started on site due to problems of delivery. The Brickkiln proposals are deliverable, achievable and viable.

Reason 2 - Significant Affordable Housing Provision (40%)

- 3.27 The proposal will significantly enhance the overall provision of affordable housing. As previously identified, approximately 400 units or 40% of all of the new dwellings proposed will be affordable.
- 3.28 This is a considerable significant amount of affordable dwellings to be providing, and goes beyond the current required amount of affordable housing provision for a scheme which incorporates a significant amount of residential provision.
- 3.29 The provision of 400 affordable homes will provide an even greater opportunity for individuals to secure a new property. Having reviewed the amount of affordable homes which have been delivered within North Hertfordshire District Council over the last few years, the amount of affordable housing provided ranges from 100-200 dwellings per annum. The scheme will, therefore, deliver the equivalent of at least two, if not four year's worth of the District's total affordable housing delivery on this one site.

- 3.30 Guidance in respect of affordable housing delivery for Luton BC is provided within the Planning Obligations Supplementary Planning Document (SPD) which was produced in September 2007.
- 3.31 Within this SPD, it provides a table based on the Housing Requirements Study for the Borough (Undertaken 2004/2005) which identifies the affordable dwelling size requirements for the Borough. Within this table, it identifies that just over half of the affordable housing requirements are for 3 and 4/5 bedroom dwellings.
- 3.32 The North Hertfordshire and Stevenage Strategic Housing Market Assessment 2007 (SHMA) was carried out by David Couttie Associates in August 2008.
- 3.33 Within this document, (Table 1-1) sets out the assessed affordable housing need and market housing demand shortfalls for North Hertfordshire and Stevenage. Across the two areas, this suggests an annual shortfall of 642 affordable dwellings within the North Hertfordshire area.
- 3.34 The SHMA identifies that, *'based on the average planned new unit supply of around 177 units (In North Hertfordshire), this level of annual need is over three times the number of units able to be provided from new delivery and conversions resulting in growing levels of unmet need each year'* (Para 12.6.3).
- 3.35 There is a clear, demonstratable need for additional affordable housing to be completed within North Hertfordshire.
- 3.36 The high quantum of affordable housing proposed at Brickkiln will contribute towards this identified shortfall.

Reason 3 - Putteridge Bury Plan

- 3.37 A Putteridge Bury Green Infrastructure and Biodiversity Management Plan accompanies this planning proposal (see Environmental Statement Appendix C8). This Management Plan will enhance a large part of the Putteridge Bury estate, which is a Registered Park and Garden located nearby to the north of the site.
- 3.38 There are significant proposals for Putteridge Bury which include;

Woodland

- Restore and enhance the existing framework of woodland
- New tree planting
- Bulb planting
- Ongoing maintenance and management of trees.

Specimen Tree Planting

- New individual tree planting
- Ongoing maintenance and management

Habitats

- Arable fields restored to pasture
- Management of livestock grazing
- New ponds
- New grasslands
- Bat grille to be fixed to aperture of former Icehouse

Access

- New paths through the estate linking to Chiltern Way and footpaths beyond the site
- Upgrade the existing by-way
- Mown paths of up to 6 metres wide

Interpretation

- New signage and interpretation at strategic points
- New way marking posts, low key seating/rest points and litter bins

Reason 4 – Significant Landscape Enhancements

- 3.39 Brickkiln will result in an overall enhancement of the local landscape resource. Existing woodland, green infrastructure and the Chiltern Way will be retained and their setting reinforced and enhanced.
- 3.40 The proposal will not significantly adverse night time impacts as the proposal is seen as an expansion to Luton from the west and will be well contained through landform, vegetation and the proposed Green Infrastructure framework from the east.
- 3.41 Once the scheme is completed, there will be a range of beneficial impacts arising from the proposal. This includes;

- New areas of structure planting, notably at the northern and southern extremities of the site.
- Formal open space, including playing fields and a primary school.
- A wide strip of public open space bordering the eastern edge of Luton and Wigmore and the western edge of the site, and a series of smaller well distributed and linked open spaces.
- NEAPs and LEAPs throughout the proposed development.
- A central 'green' adjacent to the local centre.
- Reinforced green corridors.
- Enhancement of existing woodland areas, particularly to the eastern and north-east site boundaries.

4.0 SUSTAINABILITY CREDENTIALS

4.1 A Sustainability Strategy has been prepared for Brickkiln. This strategy has followed the emerging BREEAM Communities Guidance with reference to the East of England Regional Sustainability Checklist. The strategy has been devised around a series of commitments and targets, together with identification of future opportunities for reserved matters applications.

4.2 Below is a summary of the key sustainable credentials of the Brickkiln development.

Climate Change and Energy

4.3 The site is not located within an area at risk from flooding, the drainage strategy for the site will incorporate sustainable drainage systems together with the opportunity for rainwater harvesting and recycling. Surface water will be discharged to the underlying permeable chalk strata, and deep bored soakways will be constructed together with attenuation ponds.

4.4 Public spaces and landscape planting will provide shade and cooling. Approximately 12 hectares of formal and informal open space will be provided. New areas of structure planting will be provided, together with reinforced green corridors, hedgerow planting and landscape buffers. Buildings will be designed with high energy efficiency.

Community

4.5 Buildings will be designed with a proportion to incorporate accessible features and to be adaptable, for example through the provision of lifetime homes standards. Consultation has been held with the local community and stakeholders have been engaged. Community spaces and opportunity for interaction, for example through allotments and the community hall are provided.

Place Shaping

4.6 The site is adjacent to an existing urban area and will deliver a range of affordable housing to meet current and predicted future housing need in accordance with the principles set down in the Design & Access Statement. The urban structure of the proposals will provide a network of interconnected public streets and open spaces which will provide a permeable and varied public realm. It will also provide a comprehensive Green Infrastructure Framework and deliver high quality public open spaces. The alignment of the Chiterns Way is retained and incorporated as a key green link through the development.

4.7 The average density across the site will be 35 dwellings per hectare, with slightly lower densities of development occupying the edges of the new community where the visual relationship with the adjacent countryside is more sensitive.

- 4.8 The careful articulation of density together with the associated variation in building height and scale will help to create a more distinct identity within the new community.

Ecology and Biodiversity

- 4.9 A full ecological impact assessment has been undertaken and measures to protect, retain and enhance biodiversity on site have been incorporated. Key mitigation measures include new hedgerows, water bodies, retention of woodland planting, bird and bat boxes and the relocation of badger sett.

Transport and Movement

- 4.10 The development is adjacent to existing amenities and an existing public transport corridor. Measures will be implemented to secure public transport service improvements for residents together with proactive vehicle management.
- 4.11 The proposed transport service will be regular with transport nodes located at safe, walkable distances from residential properties. Facilities will be safe with timetable information and appropriate waiting facilities. The majority of residential properties are located within a reasonable walking distance of a regular bus service or stop.
- 4.12 Initially, bus services would utilise Luton Road and complete a looped route through Cockernhoe. Once the site moves into the latter phases, a west to east route through the site will be facilitated by bus gate and bus only access onto Eaton Green road.
- 4.13 Bus services operating within the site will either be a new service or an extension of an existing service, enhancing links to Wigmore and the town centre via the airport and local employment.
- 4.14 The primary vehicular routes through the site comprise two spine roads. The first comprises a new highway link extending from Luton Road, through the new development and new local centre, rejoining Chalk Hill to the north. This alignment will remove existing through traffic routing through Cockernhoe. The second primary route heads towards the south-east of the development.
- 4.15 Safe and secure footpaths and cycle ways between key destinations will be provided within the development. This will ensure that individuals can move freely around the site. Car parking will be provided in accordance with national and local car parking standards and incorporated as both on and off street parking.

Resources

- 4.16 The developer and its contractors will aim to use at least 50% of materials in construction awarded at least a D rating or above. Where possible local materials and reclaimed materials will be sourced and used in construction. Houses will have sufficient space for composting systems and external water recycling facilities.

Business

- 4.17 The development will deliver short term construction employment opportunities together with longer term employment prospects and encouraging new businesses. Although the scheme is predominately residential led, it will provide employment opportunities through the provision of a new school and local amenities and community facilities. The provision of a new local centre will also provide further employment opportunities.

Buildings

- 4.18 All buildings will meet Building Regulations as these step up, sustainable design standards including the Code for Sustainable Homes and BREEAM for non-residential will also be met.

5.0 HOUSING ANALYSIS

HOUSING ASSESSMENT PAPER

- 5.1 As part of the planning application submission, NJL Consulting has produced a Housing Assessment Paper (Appendix 3). The purpose of this Paper is to provide a detailed assessment of the current housing situation within the Luton and South Bedfordshire area.
- 5.2 The Housing Assessment Paper considers the overall housing targets for the area and provides a review of the existing and expected housing completions.
- 5.3 In regard to affordable housing, within the North Hertfordshire Local Plan the adopted local policy approach to affordable housing delivery on larger sites (+20 dwellings), to be negotiated to meet local needs, with a target of 25% of the dwellings to be made affordable. The Local Plan does not set specific affordable housing tenure split or dwelling size requirements, but it is apparent that it places emphasis upon provision to meet local needs.
- 5.4 Therefore, taking this into consideration, the study concludes that taking the existing North Hertfordshire Local Plan 25% affordable housing target, and analysis of the existing evidence base for the North Hertfordshire administrative area, a 25% affordable housing provision would be appropriate under existing policy.
- 5.5 The East of England RSS contains a target of 35% of dwellings within new developments to be made affordable. Despite these targets, we have evidenced that there is clearly a crushing need for affordable housing provision within the North Hertfordshire area.
- 5.6 As part of the Brickkiln proposal, provision will be made to provide 40% affordable housing. This is greater than would normally be required under the adopted policy for this type of development, and contributes to the very special circumstances policy test.

Planning Policy Background

- 5.7 The Development Plan comprises of the Regional Spatial Strategy (RSS) and the Local Development Framework (LDF). This comprises of the following documents;
- East of England Regional Spatial Strategy (Adopted May 2008)
 - Milton Keynes and South Midlands Sub Regional Strategy (Adopted March 2005)
 - Saved Policies in the North Hertfordshire District Local Plan (September 2007)

- 5.8 In the absence of a new Local Development Framework for the North Hertfordshire area, the most relevant and up to date Development Plan document which must be considered for the purposes of determining this planning application is the RSS. The North Hertfordshire District Local Plan does not contain any policies relating to the quantum of housing provision for the area. Therefore the RSS and the MKSMSRS, which is part of the RSS, is the most up to date and relevant planning policy consideration.

HOUSING NUMBERS REQUIREMENTS

- 5.9 The MKSMSRS identifies that a minimum of 26,300 dwellings must be built between 2001-2021 within the Luton and South Bedfordshire Area.
- 5.10 To accommodate this growth, the MKSMSRS recognises the need for a comprehensive review of the green belt areas and states that urban extensions should come forward first in areas that are not constrained by the requirement for strategic infrastructure to be in place (para 87, MKSMSRS). It also identifies that the objective of this, **'is to ensure that construction can start at one or more of the urban extensions by 2009'** (para 88, MKSMSRS) (NJL bolding and underlining).
- 5.11 The National Housing and Planning Advice Unit (NHPAU) recently produced an advice note to Housing Ministers on the levels of provision for housing that should be tested in preparing Regional Plans.
- 5.12 This Note found that the actual housing requirement for areas within the East of England should be increased. The NHPAU are advising that more homes need to be built in this area to meet housing needs, hence the number of dwellings proposed in the MKSMSRS is likely to be an under estimate.

HOUSING COMPLETIONS 2001-2009

- 5.13 The plan period for housing completions relating to Luton and South Bedfordshire commenced in January 2001. From this time up until April 2009, a total of 6,709 dwellings have been built.
- 5.14 When comparing these completion figures against the required number of dwellings during this period (2001-2009), we have calculated a shortfall of 691 dwellings.

5 YEAR HOUSING SUPPLY FIGURES

- 5.15 Planning Policy Statement 3 : Housing (PPS 3) requires local planning authorities to assess and demonstrate a continuous five year supply of deliverable land for housing
- 5.16 Paragraph 71 of PPS 3 states that *'when Local Planning Authorities cannot demonstrate an up-to-date five year land supply of deliverable sites...or there is less than 5 years supply of deliverable sites they should consider favourably planning applications for housing, having regard to policies within this PPS...'*

- 5.17 To assess and demonstrate the delivery of housing within the Luton and South Bedfordshire area, the Luton and South Bedfordshire Joint Committee produced a Strategic Housing Land Availability Assessment (SHLAA) in April 2009.
- 5.18 Within the Luton and South Bedfordshire SHLAA, it contains a housing trajectory which estimates the total amount of dwellings which will be completed per annum up to 2031.
- 5.19 In regard to the next 5 years, Table 2 illustrates the predicted number of new dwellings to be built;

Table 2: SHLAA projected number of completions over next 5 years

Year	Total Number of Completions within MKSMSRS Requirements
2009-2010	995
2010-2011	2015
2011-2012	2117
2012-2013	1477
2013-2014	2053
Total	8857

Luton and South Beds JTU SHLAA, April 2009 Housing Trajectory

- 5.20 It is projected that a total of 8857 dwellings will be built over the next 5 years. The annual build rates predicted are considerably higher than the actual previous completions rates. The required number of dwellings as per the MKSMSRS requirements for the same period is a minimum of 8091 dwellings.

ASSESSMENT OF SITES

- 5.21 A key test of the adequacy of housing supply provision in a Development Plan for an area is whether there are 'sufficient specific deliverable sites to deliver housing in the first five years' (PPS 3, Para 54). Deliverable sites are defined as being available, suitable and achievable, and should ensure 'a continuous five year supply' (PPS 3, Para 57).
- 5.22 After reviewing the SHLAA Trajectory, there are several large residential schemes which are expected to deliver a considerable amount of the emerging housing completions over the next 5 years. As part of the Housing Assessment Paper we have undertaken a detailed review of the key residential sites within the Luton and South Bedfordshire Housing Trajectory.
- 5.23 This review assessed all residential sites within Luton and South Bedfordshire which are expected to deliver over 50 housing units within the next 5 years. As part of this assessment, planning documents relating to each site were reviewed, and we consulted with both Luton and South Bedfordshire local authorities and developers and also conducted several site visits.

- 5.24 As a result of this, we have been able to formulate our own assessments for the delivery of housing at these sites over the next 5 years.

Table 3: Housing Completions Assumptions – 2009-2014

Location	SHLAA Housing Trajectory Completions Assumptions 2009-2014	NJL Housing Completions Assumptions 2009 - 2014	Difference (NJL Assumptions - SHLAA Assumptions)
Luton Urban Area - Sites over 50 dwellings	2640	1250	1390
South Bedfordshire - Sites over 50 dwellings	2928	1767	1161
Total	5568	3017	2551

- 5.25 Table 3 compares the projected housing completions within the SHLAA Housing Trajectory for 2009-2014 against NJL Consulting housing completions for the same period.
- 5.26 Having reviewed each of these sites in detail, the SHLAA Assumptions over estimate the number of housing to be completed during this 5 year period by approximately 2551 dwellings.
- 5.27 The key sites in Luton which we believe the SHLAA had overestimated the amount of housing which will be delivered included Napier Park, Power Court and the Extension to the Mall.
- 5.28 These schemes have been around for a considerable amount of time, but due to the current housing market and delays within the planning process, we anticipate that housing completions at these locations will be significantly lower that what is projected within the SHLAA.
- 5.29 The assessment above anticipates that there will be a shortfall of approximately 2551 units on major sites within Luton and South Bedfordshire which are expected to deliver 50 or more units over the next 5 years.
- 5.30 A 10% reduction in projection rates for sites within Luton and South Bedfordshire which are expected to deliver under 50 units over the next 5 years has also been applied. This reflects the overall likely shortfalls which we anticipate could take place on sites of this size.
- 5.31 Of the sites under 50 units, we anticipate that a total of 2183 dwellings will be developed over the next 5 year years.

- 5.32 Overall NJL Consulting project, at best, that a total of 5200 dwellings will be completed within the Luton and South Bedfordshire area between 2009-2014.
- 5.33 When compared against the MKSMSRS annual average build rate requirement for the same period (8091) this represents a shortfall of approximately 2891 dwelling (Table 4)

Table 4: Housing Completions 2009 -2014

Luton & South Bedfordshire Area	Number of Dwellings
MKSMSRS Housing Requirement 2009 - 2014	8091
NJL Consulting – Projected Housing Delivery 2009-2014	5200
Total Shortfall	2891

- 5.34 Therefore, the actual real 5 year housing supply is approximately 3.2 years. This is an 'at best' scenario.

NEW HOUSING WITHIN THE SUSTAINABLE URBAN EXTENSION AREAS

- 5.35 Within the Luton and South Bedfordshire SHLAA, it is acknowledged that to achieve the required number of dwellings expected between 2001-2021, development will have to take place within these locations.
- 5.36 A total of 800 dwellings are expected to be completed by 2014 within the Sustainable Urban Extension Areas.
- 5.37 At present, we understand that these 800 dwellings are not committed in the planning system through any of the four preferred Sustainable Urban Extension Areas identified within the Luton Core Strategy Preferred Options Paper.

SUMMARY

- 5.38 Over the next 5 years, Luton and South Bedfordshire envisage that a total of 8,867 dwellings will be built.
- 5.39 Having carried out an assessment of the key sites within the Luton and South Bedfordshire area, we believe there will be an insufficient amount of dwellings completed by 2014.

- 5.40 The overall conclusion from the housing assessment is that there is a significant deficiency in the projected housing completions for the next five years. On this basis, the Council must look favourably upon planning applications for new housing which deliver the objectives in the RSS (including the MKSMSRS).
- 5.41 This identified deficiency represents a very special circumstance to justify the proposed upcoming Brickkiln scheme coming forward within the Green Belt, as the RSS shows that development should commence in such a location by 2009 to enable the overall housing targets to be met.

6.0 RETAIL ANALYSIS

INTRODUCTION

- 6.1 This section of the statement will focus upon the retail element of the proposal. As part of this application, a new local centre will be delivered, which will directly serve the inhabitants of the new housing proposed.
- 6.2 PPS 6 states that '*local planning authorities should actively plan for growth and manage change in town centres over the period of their development plan documents by.....Planning for new centres of an appropriate scale in areas of significant growth or where there are deficiencies in the existing network of centres*' (Para 2.3, PPS 6).
- 6.3 Annex A of PPS6 provides a typology for each type of centre and their main characteristics. In regard to a local centre, it states:

'Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office, and a pharmacy. Other facilities could include a hot-food takeaway and laundrette. In rural areas, large villages may perform the role of a local centre.'

- 6.4 The proposed local centre could incorporate a variety of services identified within the typology description above. Although at this stage there are no confirmed tenants, it is the character and scale of the centre that we are seeking to agree with the local authority.
- 6.5 The purpose of this section is to provide a justification for the local centre and its inclusion and appropriateness in relation to the overall scheme and surrounding area.

PLANNING FOR TOWN CENTRES (PPS 6)

- 6.6 It is important that the provision of a new local centre is considered within the context of retail planning policy. In strategic terms PPS6 seeks to:
- Ensure consumer choice by making provision for a range of shopping, leisure and local services, which allow genuine choice to meet the needs of the entire community.
 - Reduce the need to travel, to encourage the use of public transport, walking and cycling and reduce reliance on the private car.

6.7 On assessing planning applications, local authorities should consider the following key aspects:

- Employment: The net additional employment opportunities that would arise in a locality as a result of a proposed allocation.
- Economic Growth: The increased investment in an area, both direct and indirect, arising from the proposed allocation and improvements.
- Social Inclusion: This can be defined in broad terms and may, in addition to above, include other considerations, such as increasing the accessibility of a range of services and facilities to all groups.
- A network of local centres in an authority's area is essential to provide easily accessible shopping to meet people's day to day needs and should be the focus for investment in more accessible local services.

6.8 The importance of local centres to a community is highlighted within PPS 6. Paragraph 2.55 states;

'A network of local centres in an authority's area is essential to provide easily accessible shopping to meet people's day to day needs and should be the focus for investment in more accessible local services, such as health centres and other small scale community facilities. The mix of uses in local centres should be carefully managed'.

6.9 Para 2.7 also states;

'In areas of significant growth or where deficiencies are identified in the existing network of centres, new centres may be designated through the plan-making process, with priority given to deprived areas'.

RETAIL ASSESSMENT

6.10 PPS 6 contains a variety of considerations which local authorities must consider when determining new retailing developments. PPS 6 does not specifically require a sequential assessment for new local centres as such, as the principle would be that this is a creation for a new local centre which will be protected in future policy documents.

6.11 Also, within the Good Practice Guidance on Need, Impact and the Sequential Approach (Draft PPS6 Good Practice Guide, 2009) it states that *'where the need is identified to create a new centre, and the appropriate policy tests are met, it will not be necessary to apply a sequential approach to consider whether proposals planned within the new centre could be met in nearby existing centres'* (Para 6.18).

6.12 Therefore, for the purposes of this proposal we will be considering the following four key retail tests:

1. Quantitative Need for Development
2. Qualitative Need for Development
3. Retail Impact
4. Scale and Accessibility

- 6.13 It is also important to note that within PPS 6 it states, '*The level of detail and type of evidence and analysis required to address the key considerations should be proportionate to the scale and nature of the proposal*' (Para 3.7).
- 6.14 The retail assessment is therefore mindful of this and reflects the proposals for a new local centre as part of the overall scheme for the site.

1. Quantitative Need

- 6.15 In assessing quantitative need for additional development, the local planning authority should assess the likely future demand for additional retail floorspace (PPS 6, Para 2.34).
- 6.16 To assess this need, a realistic assessment of forecast population and expenditure figures are required.

Convenience Need

- 6.17 For the purposes of this assessment, we have taken all of the new housing proposed within this planning application as our catchment area. This is approximately 1000 dwellings.
- 6.18 Using this amount of dwellings, we are able to calculate the total of amount of convenience expenditure that would be available. A total of 1000 dwellings would occupy approximately 2,290 individuals (Bedfordshire County Council Population and Estimates Forecast, 2007). We have used the same expenditure figures (MapInfo TargetPro Report) which have been utilised within the Luton and South Bedfordshire Retail Study (Prepared by White Young Green, January 2009). This equates to expenditure per head of £1,656, and would create an availability of **£3.79m** for convenience expenditure by 2016.
- 6.19 Although we envisage that all the dwellings will be completed before 2016, we have tested the expenditure capacity for this year to take post-trading impacts into consideration.
- 6.20 Using the calculation above, we have been able to provide an indication of the size of foodstore which could adequately be provided by the local centre.

- 6.21 Given that it is a local centre proposal, any convenience provision would consist of small-scale supermarkets, which have average turnovers of some £5,000 per sq.m (The Co-operative Group for example).
- 6.22 Therefore if we were to divide the total amount of convenience expenditure figure by £5,000 per sq.m, there would be a quantifiable need of approximately **758 sqm net (8,160sqft net)** of floorspace on this basis alone.
- 6.23 However, these figures are based on a 100% retention of the expenditure which will be created within this location. The proposed convenience floor space within Brickkiln will equate to approximately 418sqm gross (4,500sqft gross). There is therefore a surplus of retail expenditure even accounting for the proposed floor space.
- 6.24 This means that there will be a net positive amount of expenditure also created which is likely to be spent within the Wigmore district centre, thus enhancing the overall vitality and viability of an existing designated centre.

Comparison Need

- 6.25 In regard to comparison goods, we have conducted a similar needs assessment. We have take a total of 2,290 individuals, using the same expenditure data (MapInfo Target Pro Report) which has been utilised within the Luton and South Bedfordshire Retail Study (Prepared by White Young Green, January 2009). This equates to expenditure per head of £5,069, and would create an availability of approximately **£11.6m** for comparison expenditure by 2016.
- 6.26 Using this figure (£11.6m), we are able to calculate the amount of floorspace which could be provided. If we divide the total amount of comparison expenditure figure by £4,000 per sq.m, there would be a quantifiable need of approximately **2,902 sqm net (31,236 sqft net)** of floorspace on this basis alone.
- 6.27 However, given the role of the local centre, we would not propose to allocate such a significant amount of comparison floorspace within this location. Instead, only a proportion of this floorspace capacity would be located within the proposed local centre.
- 6.28 The proposals will include approximately 371 sqm gross (4,000sqft gross) of comparison floor space, which equates to an overall expenditure of £1.48m. We envisage that the comparison retail units would have a net trading space of 334 sqm (3,600 sqft) which would equate to an overall expenditure of £1.33m. Therefore, the additional expenditure capacity for comparison goods which will be captured by other centres in and around the area, such as Wigmore as well as Luton town centre itself and Hitchin. This again will lead to an enhancement of the vitality and viability of these centres.

2. Qualitative Need

- 6.29 In assessing qualitative need for additional development a key consideration for a local authority will be to provide for consumer choice, by ensuring that provision is made for a range of sites for shopping, leisure and local services, which provide genuine choice to meet the needs of the whole community (PPS 6, Para 2.35).
- 6.30 The local centre will meet this qualitative need by;
- Enhancing consumer choice for local residents by providing additional retailing opportunities.
 - Providing a retailing destination which is easily accessible to the local community.
- 6.31 The local centre will contain a variety of comparison and convenience retailing opportunities, along with additional local services which could include a hairdresser, bank or other service sector uses.
- 6.32 A minimum scale is required to make it work, and flexibility on the format and range of uses is required.

3. Retail Impact

- 6.33 For the purposes of this statement we feel that it is not appropriate for us to undertake a detailed retail impact assessment for the proposed local centre. In regard to impacts to existing centres, due to its scale and location, the proposal offers limited competition to existing centres within Luton and North Hertfordshire.
- 6.34 The two existing centres nearest to the proposed site are Stopsley District Centre and Wigmore District Centre.
- 6.35 Stopsley District Centre contains a total of 37 retail units. Within the WYG retail study is describes that *'the vitality and viability of the centre appears to be good'* (Para 4.72).
- 6.36 Wigmore District Centre consists of a large Asda foodstore and an adjoining parade of 7 units. The Asda foodstore has been identified as overtrading. The WYG Retail study states that, *'the lack of vacant units suggest good levels of vitality and viability in the centre as a whole'* (Para 4.74).
- 6.37 The nearest centres to the proposed local centre appear to be trading well. Given the scale and nature of the local centre, we feel that the provision of a new centre will complement the existing provision within Luton.
- 6.38 The local centre will draw trade from the newly created residential area. This is new expenditure, and therefore trade draw from the existing centres is not an issue. Therefore there will be no direct retail impact. Indeed, given the scale of the facility proposed these will be positive impacts on the current identified centres. This is

demonstrated in our figures above showing the surplus expenditure generated by the proposals which will not be met within the local centre proposed.

4. Scale and Accessibility

- 6.39 PPS 6 states that *'in selecting suitable sites for development, local planning authorities should ensure that the scale of opportunities identified are directly related to the role and function of the centre and its catchment'*. (Para 2.41).
- 6.40 The overall site area of the local centre will be approximately 1.2ha. The size of this site is considered appropriate to create a local centre which can suitably serve the surrounding area.
- 6.41 The proposed local centre will be of a scale appropriate to its surrounding area. It is envisaged that the local centre will be located to the north-east of Wigmore. In regard to the overall Masterplan area, the location of the centre has been located along a key strategic road.
- 6.42 The local centre will be the focus for community activity, and will be located adjacent to the central green and close to the primary school and formal open space facilities. The centre also lies at the junction of two main movement routes and on the sites footpath and cycle network.
- 6.43 Finally, the nearest centre to the site is Wigmore District Centre. If a new centre was not proposed, the new community would consequently have to travel to Wigmore for their local shopping needs. This would result in individuals have to travel longer distances on a daily basis to access their basic shopping products.

BENEFITS OF THE LOCAL CENTRE

- 6.44 The proposal includes the provision of a new local centre. This local centre would be approximately 1.2ha in size, and contain a variety of retail services similar to that identified within the PPS 6 typology definition of a local centre.
- 6.45 The local centre will contain a number of retail units of flexible size and uses (A1-A5 & D1 Use Classes).
- 6.46 The local centre will also provide a new Community Hall. This will be of significant benefit to the new community, and will act as a focal point to the centre. The Community Hall will be a minimum of 92.9 sqm (1,000sqft) and up to a maximum of 464 sqm (5,000 sqft).
- 6.47 We envisage that there will be a maximum of up to 790 sqm gross (8,500sqft gross) of A1 – A5 Retail facilities within this location. This will ensure a flexible approach to delivery to deliver a vital and viable local centre.
- 6.48 The local centre will provide an adequate provision of retailing services which will be of a suitable scale to serve the surrounding area. The provision of a local centre will

also create new job opportunities in the area. It will also create additional business opportunities for retailers.

- 6.49 The centre clearly meets a newly created retail need, and will not impact upon the overall role and function of the existing retail centres.
- 6.50 The centre will provide essential local facilities and will act as a focal point within the development.

7.0 TECHNICAL SUMMARY

SUMMARY OF KEY SUPPORTING DOCUMENTATION

Flood Risk Assessment – *Bureau Veritas UK Ltd*

- 7.1 This report has been commissioned to assess the risk of flooding to the proposed Brickkiln development. In assessing the flood risk, the impacts of climate change have been considered for the lifetime of the proposed development.
- 7.2 The site falls within Flood Zone 1 with respect to both fluvial and coastal flood risk as defined by PPS25. Zone 1 is a low probability flood risk area, suitable for all forms of development. Hence the site is suitable in flood risk terms for the proposed development.
- 7.3 The proposed development will be served by an attenuated surface water management system discharging to ground via deep bore soakways. The surface water management systems will be maintained to a high standard to reduce the risk of failure

Transport Assessment – *David Tucker Associates*

- 7.4 David Tucker Associates have prepared a Transport Assessment for the Brickkiln proposal.
- 7.5 Within the Assessment, the relationship of the development to the highway network, public transport network, cycle and pedestrian routes and local facilities has been fully considered. Assignment of vehicular traffic to the highway network has been described. The proposed site access arrangements, proposed infrastructure improvements, enhancement to the surrounding transport network and the likely impact of the development generated traffic has also been set out.
- 7.6 Off site pedestrian and cycle enhancements are also proposed and subject to the necessary agreements being in place arrangements will be entered into to secure their implementation. These include an off-road cycle land along Luton Road/Crawley Green Road and Wigmore Lane connecting with the secondary school and local centre. The existing on and off road cycle/footpath along the eastern edge of the existing built up area to connect with Putteridge Road via Selsey Drive will be upgraded and extended.
- 7.7 In regard to bus services, subject to consistency with public transport infrastructure and facilities, the site facilities will include the provision of a low level buses, real-time travel information at stops and the provision of shelters and seating at key stops.
- 7.8 In terms of highways impacts, a capacity led mitigation scheme is identified at the Crawley Green Road/Vauxhall Way roundabout. Further amendments are

recommended on the rural highway network including safety enhancements in the form of speed control and vehicle handling will be considered.

- 7.9 The site road design strategy will remove extraneous traffic from the community of Cockernhoe/Mangrove Green. There will be no reason for traffic from the site to route through either place. No material impact on the strategic network has been identified.
- 7.10 A draft Residential Travel Plan has also been included within the Statement. This sets out a strategy for encouraging sustainable transport from the outset and a monitoring programme to determine whether the targeted modal shift has been achieved.
- 7.11 Overall, the transport assessment found that the site proposals and supporting transport package are entirely consistent with current guidance, and that measures have been identified within the assessment which fully mitigates the transport impact of the development.

Environmental Statement - NJL Consulting and Specialist Consultant Team

- 7.12 As part of this planning application submission, an Environmental Impact Assessment (EIA) has been undertaken and an Environmental Statement prepared.
- 7.13 The proposed scope of the EIA was consulted upon with NHDC and Luton Borough Council. The environmental information which is addressed within the Environmental Statement includes the following topics;
- Social and Community
 - Landscape and Visual;
 - Ecology;
 - Cultural Heritage;
 - Agriculture;
 - Ground Conditions;
 - Transport and Accessibility;
 - Noise;
 - Air Quality; and
 - Hydrology and Water Resources.

- 7.14 The EIA was undertaken using established methods and criteria, including site visits, desk study, field surveys, data review and analysis and computer modelling. The baseline studies allow information to be gathered in the impact area so valid impact predictions can be made, and effective mitigation measures and monitoring put in place.
- 7.15 Having reviewed all of the above topics in detail, there will be no substantial adverse impacts as a result of this proposal. A variety of appropriate mitigation measures are proposed to ensure that adverse impacts as a result of the development are avoided, reduced or compensated for.

Design & Access Statement – Hankinson Duckett Associates

- 7.16 A Design & Access Statement has been prepared by Hankinson Duckett Associates in support of this proposal.
- 7.17 This document sets out the principles that lie behind the formulation and development of the masterplan and movement strategy, and identifies the design considerations that have influenced the form and content of the masterplan.
- 7.18 The Design & Access Statement has taken all relevant national and local policies into consideration, including advice on best practice which has been prepared by the Government, English Partnerships, the Housing Corporation and the Commission for the Built Environment (CABE).
- 7.19 The Statement has assessed a broad range of potential environmental issues along with the general geography of the site. The most significant environmental issues which have influenced the design and layout of the masterplan relate to topography, vegetation structure, land use and settlement patterns, wildlife and conservation and heritage and archaeological resource.
- 7.20 The Statement also provides an Illustrative Masterplan for the site. Having reviewed the key site constraints and opportunities, basic parameters have been set within which the community will be developed.
- 7.21 The Masterplan provides an illustrative layout of the existing and new access provision, which includes the provision of pedestrian and cycling pathways and also details how bus services will operate within the site. The primary vehicular routes through the site will comprise of two spine roads, one of which will be a new highway link extending from Luton Road through the new development and new local centre, before rejoining Chalk Hill to the north.
- 7.22 The urban structure of the site will provide a network of interconnected public streets and open spaces which will provide a permeable and varied public realm. Approximately 12 hectares of open space will be provided. Significant landscaping enhancements are also proposed which will provide structure planting, reinforced green corridors and the enhancement of existing wildlife corridors and woodland plantations.

- 7.23 The key land uses identified within the Masterplan is residential and a local centre. In regard to the residential land use, three residential areas have been identified, which are located to the north, south and east of the local centre. Each of these identified areas will provide a mix of dwelling types and will be characterised by their settings and relationship to the local centre.
- 7.24 The local centre will be the focus for community activity, and is located adjacent to the central green and close to the proposed school and formal open space facilities. The centre will be a mixed use space, and will contain a variety of retailing uses which will be sufficient in scale to meet the daily needs of the local neighbourhood.
- 7.25 Overall the Masterplan provides a clear, illustrative vision of how the proposals will appear. In delivering the Masterplan, the Statement also includes a Phasing Strategy which comprises of five phases, identifying how the scheme can be delivered.

8.0 CONFORMITY WITH POLICY

- 8.1 General conformity with the Development Plan is the primary mechanism for determining the appropriateness of proposals within planning applications. Relevant other material considerations in this instance also include national planning policy provisions contained within planning policy guidance or statements.
- 8.2 A full planning policy assessment has been undertaken and appended within a checklist at Appendix 4 of this statement.

THE DEVELOPMENT PLAN

- 8.3 The Development Plan in this instance consists of the following;
- East of England Regional Spatial Strategy (Adopted May 2008)
 - Milton Keynes and South Midlands Sub Regional Strategy (Adopted March 2005).
 - North Hertfordshire District Local Plan (Saved September 2007)

East of England Regional Spatial Strategy (May 2008)

- 8.4 We are in accordance with the following RSS Policies;
- **Policy SS1 : Achieving Sustainable Development**
During the design stages the Guiding principles of the UK Development Strategy will be taken into consideration. The proposal will promote a new sustainable community, which will promote social inclusion, accessibility and high quality design.
 - **Policy SS3 : Key Centres for Development and Change**
To achieve sustainable development and the aims of Policy SS1 and SS2, new developments should be concentrated within a variety of locations across the East of England, one of which is identified as Luton/Dunstable/Houghton Regis & Leighton Linlade.

This proposal is allocated within this identified area in which new development should be focussed.

- **Policy SS7 : Green Belt**

The policy identifies that strategic reviews of green belt boundaries are required to meet regional development needs at the most sustainable locations. The proposal is located within a green belt site. However, RSS also includes a Sub Regional Strategy which is critical to the green belt policy position (See below). In addition, as identified within Chapter 3 of this Statement, a case has been made for very special circumstances which justify the appropriateness of this development within this location.

- **Policy H1 : Regional Housing Provision 2001 to 2021**

This policy identifies that between 2001-2021 a minimum of 26,300 new dwellings must be built. This proposal will positively contribute towards achieving the housing requirements for the Luton and South Bedfordshire Region.

- **Policy H2 : Affordable Housing**

This policy requires all Local Planning Authorities to set appropriate affordable housing targets for the area. The affordable housing requirement for the North Hertfordshire is 25% affordable provision for all sites over 20 dwellings. The proposal provides 40% of the overall housing to be affordable, which goes significantly beyond the affordable housing aspirations for the area.

Milton Keynes and South Midlands Sub Regional Strategy (March 2005)

8.5 The MKSMSRS forms part of the Regional Spatial Strategy for the East of England.

8.6 'The Sub Regional Strategy forms part of the regional policy basis for the preparation of statutory Local Development Documents by local planning authorities within the sub region' (MKSMSRS, pg 6).

8.7 We are in accordance with the following RSS Policies;

- **Strategic Policy 1 : Locations for Growth**

This policy identifies areas for growth within the Sub Region. The site is located within the identified Luton growth area. Therefore a proposal for new residential development in these locations will help to contribute to the overall policy objectives of the Plan.

- **Strategic Policy 3 : Sustainable Communities**

The policy seeks to achieve sustainable communities through the implementation of development accordance with a variety of principles. The proposals included within this application seek to create high quality

designed buildings which will be accessible to all members of the community. The scheme will also provide an appropriate range and mix of housing units, including an element of affordable housing. The provision of retailing facilities will provide necessary social provisions for the new community.

- **Bedfordshire and Luton Policy 2B :Luton/Dunstable/Houghton Regis and Leighton Linlade**

This policy identifies the total amount of dwellings which are required to be built within Luton/Dunstable/Houghton Regis and Leighton Linlade. A minimum of 26,300 dwellings are required between 2001-2021. The proposal will contribute significantly towards achieving the minimum housing requirements for the area.

As identified within the MKSMSRS, an objective of the Strategy was to commence the construction of one or more of the urban extensions by 2009. Failure to allow the development of this proposal within an identified Sustainable Urban Extension area will result in not achieving one of the key Development Plan policies.

North Hertfordshire District Local Plan (Saved September 2007)

8.8 We are in accordance with the following policies;

- **Policy 2 : Green Belt**

This policy states that within Green Belt locations, the Council will aim to keep the uses of land open in character. Except for proposals in very special circumstances, planning permission will only be granted for new buildings, extensions, and change of uses of buildings and of land which are appropriate in the Green Belt, and which would not result in significant visual impact.

Very special circumstances for development to take place within the Green Belt have been demonstrated for this proposal. The supporting planning documentation has identified there is an inadequate 5 year housing supply within the Luton and South Bedfordshire area. Therefore, to assist towards ensuring a 5 year housing supply can be achieved, alternative sites must be considered for residential development.

The proposal incorporates a variety of very special circumstances. A significant amount of affordable housing provision will be provided, along with significant landscaping enhancements.

- **Policy 14 : Nature Conservation**

The policy states that For Local Nature Reserves, Sites of Special Scientific Interest, Nature Reserves of the Hertfordshire and Middlesex Wildlife Trust, and sites of local Wildlife Significance, the Council will preserve their wildlife importance by not normally granting planning permission for development proposals in these sites, or which may harm their value, and will seek their continued management for nature conservation.

There are no statutory landscape designations within the site boundary. A Green Infrastructure framework has been submitted in support of this proposal. This will retain and reinforce existing features of value such as Brickkiln Wood for the benefit of people and wildlife. Overall no significant adverse landscape impacts are anticipated on completion.

- **Policy 16 : Areas of Archaeological Significance and other Archaeological Areas**

The policy states that For Archaeological Areas, the Council may require a preliminary evaluation of any potential archaeological remains before deciding to permit or to refuse development proposals.

As part of this planning proposal an archaeological assessment was undertaken. No cultural heritage features of greater than low value have been identified within the site following an extensive programme of baseline surveys which have included desk-based assessment, fieldwalking, geophysical survey and trial trench evaluation. These surveys demonstrate that there is a low level of late prehistoric and Romano-British activity within the site, but there is no evidence for a focus of settlement or industrial activity. On current evidence this activity is best interpreted as the remains of an extensive, but dispersed, process of clay extraction.

Overall the proposed development will not have any major adverse impacts on the cultural heritage resource of the site and its surrounding area.

NATIONAL PLANNING POLICY

8.9 We have considered the provisions of the followings national policy documents, and are in accordance with the following National Planning Policy Statements;

- **PPS 3 : Housing (2006)**

The planning objectives of this policy seek to achieve high quality housing that is well designed and built to a high standard, a mix of housing, both marketable and affordable, particularly in terms of tenure and price.

Paragraph 71 states that 'when Local Planning Authorities cannot demonstrate an up-to-date five year land supply of deliverable sites...or there is less than 5 years supply of deliverable sites they should consider favourably planning applications for housing, having regard to policies within this PPS'

The Housing Assessment Paper submitted alongside this Planning Statement concludes that the Luton Borough Council only have a housing supply of 3.2 years.

Therefore, given that the Council does not have a minimum 5 year housing supply, new housing developments within this location must be looked upon favourably.

PPS 6: Planning for Town Centres (2005)

The Governments key objectives within this Statement seek to;

Enhance consumer choice by making provision for a range of shopping, leisure and local services.

Support efficient, competitive and innovative retail, leisure, tourism and other sectors.

Improving accessibility, ensuring that existing or new development is, or will be, accessible and well served by a choice of means of transport.

The policy also sets out a series of key retailing tests by which LPA must assess new proposals. These include;

- *The retail need for development*
- *The development is of an appropriate scale*
- *There are no more central sites for the development*
- *There are no unacceptable impacts on existing centres; and*
- *The locations are accessible.*

As detailed within Section 6 of this Statement, it has been demonstrated that the retailing element of the proposal accords with the relevant planning policy tests. The proposed local centre will be of an appropriate scale, and will not impact upon any existing retailing centres within the area. The location of the proposed centre will ensure that it is accessible by a variety of forms of transportation.

- **PPS 9 : Biodiversity and Geological Conservation (2005)**

This statement sets out planning policies on protection of biodiversity and geological conservation through the planning system.

As part of this planning application submission a variety of measures were taken to ensure the protection of biodiversity and geological conservation. A Green Infrastructure framework strategy has been submitted as part of this application. A landscape buffer will also be provided which will visually separate the development from Cockernhoe.

Measures will also be taken during the construction stages to ensure that all existing habitats are sensitively dealt with. This will include the new hedgerows, water bodies, retention of woodland planting, bird and bat boxes and the relocation of a badger sett.

- **PPG 13 : Transport (2001)**

The key objectives of this policy guidance are too;

- *Promote more sustainable transport choices for people;*
- *Promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling;*
- *Reduce the need to travel, especially by car.*

The scheme will encourage individuals to undertake a variety of sustainable transport patterns within and around the site. The location of the local centre and the residential area will provide easy access to shopping facilities, and will encourage individuals to access these facilities via walking or cycling, thus reducing the reliance on the private car.

Significant pedestrian and cycle enhancements are proposed throughout the site. Bus services will operate within the site and also improve accessibility for the wider community to ensure that a viable alternative to car travel is available.

A Transport Assessment has been submitted alongside this application which concludes that no significant impacts are predicted as a result of this proposal. A Travel Plan will also be produced for the site.

- **PPG 17 : Planning for Open Space, Sport and Recreation (2002)**

This policy acknowledges that open spaces, sport and recreation all underpin people's quality of life. Well designed and implemented planning policies for open space, sport and recreation are therefore fundamental to delivering broader Government Objectives.

The proposals include the provision of a considerable amount of open space. This space could be used for sport or recreation facilities, and encourage individuals to exercise which will promote good health and well being.

Approximately 12 hectares of open space will be provided and will include children's play areas, a playing pitch along with additional allotment areas.

- **PPS 25 : Development and Flood Risk (2006)**

This statement sets out the Government policy on development and flood risk. The aims of the statement are to ensure that flood risk is taken into consideration at all stages of the planning process to avoid inappropriate development in areas at risk of flooding.

As part of the proposal, a Flood Risk Assessment has been prepared. This Assessment identified the site as being located in Flood Risk 1 (low risk). The Assessment predicts that no significant impacts will occur as a result of the proposal. Sustainable drainage systems are also proposed which will control surface water run off at this location.

- **PPS 1 : Sustainable Developments (2005)**

This policy seeks to ensure that sustainable development is provided for in local planning policy documents. Sustainable development is delivered based on the UK principles of:

Social Cohesion and inclusion – The proposal consists of the creation of a new urban extension area. This will be occupied by a new residential community. The services provided within the proposal will ensure that the new community are adequately served by a variety of social facilities within an accessible location.

Protection and enhancement of the environment – The proposal will positively contribute to the overall surrounding of the site.

Prudent use of natural resources – During the construction stage of this development, consideration will be given to the type of resources used, to ensure that a prudent use of natural resources is achieved.

Sustainable economic development – The proposal will provide a variety of services including new housing, retail and education facilities. This will stimulate and promote economic development within this location at a level which is appropriate to its scale.

- **Supplement to PPS1 : Planning and Climate Change (2007)**

The Supplement to PPS1 (sPPS1) sets out how planning should contribute to reducing greenhouse gas emissions, stabilising climate change and adapting to its foreseeable effects. The document sets a series of objectives covering general, social, environmental and economic objectives for the delivery of sustainable development. For considering individual planning applications, paragraph 42 of the sPPS1 states that planning authorities should expect new development to adhere to a variety of principles including;

- *Comply with adopted DPD policies on local requirements for decentralised energy supply and for sustainable buildings - At the reserved matters stage of this application an energy strategy will be developed which will focus upon meeting DPD requirements.*
- *Take account of landform, layout, orientation, massing and landscaping to minimise energy consumption – An energy strategy will be put into place which will seek to minimise energy consumption.*
- *Consider how all aspects of the development, together with the proposed density and mix of development, support opportunities for decentralised and renewable or low carbon energy supply – Where possible, local materials and reclaimed materials will be sourced during construction. All buildings proposed will meet current building regulations.*
- *Develop a high quality local environment – Significant landscaping improvements are proposed throughout the whole site. These include a comprehensive green infrastructure framework which will provide new areas of structural planting and landscape buffers.*
- *Provide public and private open space so that it offers acceptable choice of shade, shelter and recognises opportunities for flood storage, wildlife and people - . The proposal will also provide up to 12 hectares of formal and informal open space. The alignment of the Chilterns Way will also be retained and incorporated as a key green link throughout the development. New areas of structure planting will also be provided, together with reinforced green corridors and hedgerow planting.*
- *Give priority to the use of sustainable drainage systems and consider the contribution to be gained from water harvesting from impermeable surfaces and encourage layouts that accommodate waste water recycling – A drainage strategy for the site has been prepared, which will ensure that surface water run off within the site will be discharged to the underlying permeable chalk strata. Deep bored soakways will also be constructed.*
- *Provide for sustainable waste management – All of the proposed houses will have sufficient space to incorporate a home*

composting system. Recycling facilities could also be provided at suitable locations within the site.

- *Create and secure opportunities for sustainable transport in line with PPG 13 - The scheme will encourage individuals to undertake a variety of sustainable transport patterns within and around the site. The scheme also includes the provision of additional pedestrian and cycling pathways.*

- **PPG 2 : Green Belts (2001)**

The fundamental aim of Green Belts is to prevent urban sprawl by keeping land permanently open.

Paragraph 1.5 identifies the 5 key purposes for including land within the Green Belt.

Paragraph 1.6 identifies the use of Green Belt land.

Paragraph 3.2 states 'inappropriate development is, by definition harmful to the Green Belt. It is for the applicant to show why permission should be granted. Very Special Circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations'.

Given that Joint Technical Unit for Luton and South Bedfordshire are unable to demonstrate an adequate 5 year housing supply, this contributes to one of our very special circumstances to permit this development to take place.

We believe that the scheme will not significantly undermine the purposes of including land in the green belt in the wider area where this is to be retained.

The scheme will have no significant harm to the green belt, and the very special circumstances which have been identified within this statement illustrate the justification of the proposal and outweigh such harm.

SUMMARY

- 8.10 It has been demonstrated that the proposals included within this planning application accord with all relevant national, regional and local planning documentation.
- 8.11 The harm to the Green Belt will not be significant, and the perceived harm is outweighed by the very special circumstances of the proposals.
- 8.12 In regard to our Very Special Circumstance to justify this type of development taking place in this location, chapter 3 of this statement has considered this in detail.

- 8.13 Throughout this statement, it sets out why it is considered that very special circumstances exist which outweigh possible green belt objections to the proposals. The development on land directly to the urban fringe of Luton is needed to meet the immediate housing requirement to 2014. The current housing trajectories show that there is a shortfall in housing numbers to meet the current targets for the number of new homes required in the East of England which are only likely to be higher. This continuing and pressing need for this development in the applicants view outweighs a Green Belt objection which is why permission should be granted. Furthermore, the proposals are deliverable early as there is no landownership, environmental or infrastructure constraints.
- 8.14 The determining Planning Authority needs to allow for more housing to address the housing need in this locality and in the East of England Region as a whole.
- 8.15 This proposal will promote a number of core principles contained within national planning policies and Development Plan policies. These are as follows;
- Contributing towards sustainable development
 - Provision of new housing
- 8.16 This section has robustly assessed all of the planning policies which are relevant to this proposal. By carrying out all relevant tests, we have clearly demonstrated how the proposal conforms to each of the policies.
- 8.17 Therefore on the basis of the thorough assessments reported in this statement, and within other supporting documentation, the proposals comply with all necessary policy provisions and with the Development Plan when read as a whole.

9.0 SUMMARY AND CONCLUSION

SUMMARY

- 9.1 This planning statement has been produced to support our planning application for a mixed use sustainable area incorporating residential (up to 1,000 units), community facilities including new primary school, community hall and local centre, green infrastructure and associated roads. The application seeks outline planning permission controlled by parameter, which will contain fixed maximum parameters for certain key elements of the scheme.
- 9.2 The RSS through the MKSMSRS identifies that a minimum of 26,300 dwellings must be built between 2001-2021 within the Luton and South Bedfordshire Area. As of April 2009, a total of 6,709 dwellings had been completed, leaving a total of requirement of 19,591 dwellings up to 2021.
- 9.3 The Luton and South Bedfordshire SHLAA Housing Trajectory has predicted how these remaining dwellings will come forward. In regard to their 5 year supply housing figures, as required by PPS 3, they project that a total of 8,857 dwellings will be built over the next 5 years.
- 9.4 However, we have undertaken our own assessment of the exact same sites and project that only 5442 dwellings will come forward over between 2009-2014.
- 9.5 This identified deficiency represents a key very special circumstance to justify this development taking place within the green belt. The proposals will also provide for 40% affordable housing which is above current policy requirements and will address the identified shortfall of provision and need of affordable housing in North Herts. This represents another very special circumstance. Additional very special circumstances also include significant landscape and habitat enhancements along with a Putteridge Bury Management Plan.
- 9.6 The creation of a new local centre which will be located within an accessible location, will provide a sufficient amount of provision to meet the everyday shopping needs of the local community. There is an identified need for the new local centre, and it will also provide new job opportunities.
- 9.7 The proposal has been considered against all relevant Development Plan policies and other material considerations. We have found that the proposals comply with all necessary policy provisions.

CONCLUSIONS

1. In terms of PPS 3, it has been evidenced that this site is achievable, suitable and available. It can be delivered early and will positively contribute towards the overall housing numbers requirement as set out in the MKSMSRS.
2. The housing assessment paper (Appendix 3) has demonstrated that the projected 5 year housing supply for Luton and South Bedfordshire within the SHLAA Housing Trajectory is unlikely to be achieved.
3. The Brickkiln proposal will also bring significant landscape benefits to the site and the surrounding area. The Management Plan for Putteridge Bury will also significantly enhance the overall attraction and openness of the park. A considerable amount of affordable housing will be delivered above the currently adopted policy requirements, addressing the identified need.
4. This constitutes our very special circumstances for developing within the green belt. The very special circumstances outweigh the element of harm to the green belt, and in turn, fully justifies the release of land for development.
5. This Statement has shown that the proposal accords with all necessary policy provisions and therefore we respectfully request that this planning application be supported by the Council and approved accordingly.