

NORTH HERTFORDSHIRE LOCAL PLAN EXAMINATION: CPRE HERTFORDSHIRE REPRESENTATIONS ON EXAMINATION DOCUMENT ED 224 - STATEMENT OF COMMON GROUND ON HOUSING NEED AND DELIVERY IN LUTON

CPRE Hertfordshire (CPREH) wishes to make representations on four parts of the SOCG dated December 2020, between NHDC, Luton BC, Bloor Homes and Crown Estates, the last two of whom stand to benefit financially if the sites proposed in the submitted NHLP East of Luton, are developed.

CPREH considers that the SOCG fails to recognise important up to date facts on Luton's housing capacity, arising from the further scrutiny of likely net housing delivery in Luton, following the submission of evidence on this matter by third party representations to the Examination. Luton itself has a much greater ability to meet its own housing needs within its administrative boundary than was known at the times the Luton Local Plan was published, examined and adopted, yet the SOCG by the four signatory organisations blatantly ignores the facts arising from this information and their own further scrutiny.

CPREH's comments are therefore made in order to point out to the Inspector where the four parties to the SOCG have, in the opinion of CPREH, misinterpreted, or avoided the key finding of their own updated review of the likely increase in dwelling numbers in the area of Luton Borough.

These comments are set out under the relevant paragraph number of the SOCG.

Paragraph 7.

This paragraph states that the update of the SHLAA "...anticipates further delivery ... equating to a total of 10,903 over the plan period. Clearly this is higher than the originally anticipated 8,500 dwellings" (set out in the adopted Luton Local Plan).

Firstly, this is not just 'higher', it is 28 per cent higher, and takes no account of the significant further increase identified after the updated SHLAA in 2019. Rather than recognise that this increase is material to the ability of the Luton area to contribute to its own needs, and to reducing the demand on neighbouring areas, paragraph 7 argues that there are doubts about delivery of this increase in capacity. Elsewhere however, allowing for such doubts only reduce anticipated numbers very slightly, and it is totally unreasonable to dismiss the scale of the increase in capacity identified by the SOCG parties themselves.

Secondly, and far worse however, the same paragraph states that the 'additional capacity' the parties have identified 'needs to be considered in the context that its (Luton's) unmet needs of 9,300 dwellings are distributed in both North Hertfordshire and Central Bedfordshire.' This is patently absurd. If an additional 2,403 dwellings are likely to be built in Luton in the plan period, the 'unmet needs' by definition fall by 2,403. That is, they are no longer an 'unmet need', but a 'met need'!

CPRE recognises that this would leave a little under 7,000 dwellings to be built somewhere, but further capacity has already been identified in Luton itself since the SHLAA update (paragraphs 15 and 16 below), and Central Bedfordshire Council has also now made provision for more than the residual number, so no provision at all is required in the tiny rural area in the Luton HMA in North Herts, and the East of Luton site allocations are also totally unnecessary, however the calculations are carried out.

Paragraphs 15 and 16

The SOCG notes the 'further permissions' to those in the updated SHLAA, but argues that recent events including the Covid-19 pandemic and Brexit, may affect the economy and result in under-delivery of this increase. This speculation is surely an unsound basis for

such important decisions when the evidence from 2020 with government-facilitated and prioritised construction and housebuilding, and 2021, when there has been a booming housing market and strong evidence of economic recovery, is that there is very unlikely to be under-delivery over the plan period as a whole, and when the government is continuing to press for a substantial further increase in housebuilding.

Paragraph 18.

Whilst this paragraph confirms ‘overall delivery rates being higher than anticipated in Luton Borough’ it also claims that the Luton Inspector’s comments on meeting affordable housing needs justify the higher level of overall provision. This is a false argument, because the Luton Inspector’s comments were in the context of Luton only having capacity for 8,500 dwellings (up from 7,000 in the submitted plan), not in the context of capacity well in excess of 11,000 dwellings, which is what is now anticipated.

Paragraph 26.

In this concluding paragraph, the four parties state that ‘housing needs of Luton have not and will not be met elsewhere (in the HMA) ...or anywhere else’. But clearly, evidence from their own further research, even ignoring the further more recent data on capacity, deems this to be patently untrue, with at least half that need already in the planning pipeline, based on the evidence now before the Inspector.

CPREH strongly urges the Inspector to reject the principal SOCG point that the increase in Luton’s capacity does not affect the need for the site allocations in North Herts. It clearly does and CPREH asks the Inspector to take this into account when deciding on the fate of the East of Luton site allocation proposals, which in their opinion should be removed from the Plan.