

8 March 2022

Simon Berkeley BA MA MRTPI
Inspector
C/O Louise St John Howe
PO Services
PO Box 10965,
Sudbury
Suffolk,
CO10 3BF

Dear Mr Berkeley,

Examination of North Herts D C Local Plan 2011 -2031

We are acutely aware that you have stated that you do not want any further information provided on your above examination. However we have been advised by Chris Pritchard of The planning Inspectorate that "*The Inspector has the discretion to decide whether, or not, to accept further submissions*".

We also recognise that this examination has been a very long, protracted, complex and contentious one. Perhaps the East of Luton proposal, which NHDC has confirmed to you was specifically under the duty to co-operate with Luton BC's 2017 stated unmet needs, has been a major issue for you to determine.

We both provided consultation responses to ED172 and Mr Parker included a table of Luton BC's increased housing capacity up to 6th January 2021. At that point it had risen to 14,755 compared to the figure of 8,500 stated in Luton BC's Local Plan. You requested an update of Luton BC's OAN which was prepared and stated as 16,700.

In the past year to 28th February 2022 we have conducted a review of Luton BC's development control committee meetings and established:

1. Additional grants of planning permission on new sites totalling 283 dwellings
2. Grant of planning on Power Court for an additional 650 dwellings (already included in the 14,755 dwellings mentioned above following a public announcement)
3. Grant of planning permission for commercial development on Newlands Park and its sale by Luton FC to help fund their new stadium within the Power Court development
4. An Appeal against the Planning Committee's refusal to grant permission for 84 new dwellings on a derelict site close to Luton centre that had been recommended by the planning department and welcomed by Luton Housing.
5. A deferral on a decision to redevelop a site in Luton for 62 dwellings because of inadequacy of proposed parking spaces.

Luton BC's housing capacity has therefore increased to 15,038 on identified sites with planning permission, as per our attachment, against an OAN of 16,700. There are known sites as per notes 4 and 5 above that should give rise to additional housing in due course. Plus there is the distinct probability that more housing applications and approvals will come forward over the next few years for build up to 2031.

Luton BC has failed to comply with a policy commitment in its Local Plan, under LLP40, to re-assess its housing unmet need and complete the task within the 4 years to mid-2021. The Planning Inspectorate states it has no powers to require them to comply once the Local Plan has been adopted!

We have kept in touch with Central Beds Local Plan team on the progress on one particular site reserved by them to assist Luton BC with its unmet needs. In their Local Plan 2015-2035, adopted in July 2021, they committed to providing Luton BC with 7,350 dwellings by 2031 out of sites totalling capacity of 8,800.

The one site we are following is Houghton Regis North, which is to be linked with Luton town centre with a busway currently from Dunstable but planned to be extended. Planning at this location is for 7,000 dwellings of which HRN1 is for 5,150 dwellings and HRN2 is for 1,850. In Central Beds' housing trajectory dated 1 October 2021 HRN1 is scheduled to complete 2,313 dwellings by 2030/31 and by 2025/26 HRN2 should be fully completed. We attach Central Beds information on this site up to 31 December 2021 that they provided on 28 February 2022. On HRN1 with outline permission for 5,150, reserved matters had been granted on 613 dwellings of which, at 31 December 2021, some 243 were either completed or under construction (29 at 31.12.20). At HRN 2 with outline permission for 1,850 and reserved matters for all at 31 December 2021, some 1,128 were either completed or under construction (653 at 31.12.20).

Houghton Regis North 2 will provide all of Luton BC's revised unmet housing need by 2025/26 with 150 to spare and then Houghton Regis North 1 will have completed a further 2,313 by 2030/31.

The further Central Beds site of Luton North, offered up for Luton BC's unmet needs, for 3,600 dwellings is also progressing well with the government having authorised the start of the building of the link road between the M1 and the A6 which was dependent on approval of this site.

We believe that this up to date information will help the Inspector to conclude on whether the East of Luton proposed development on Green Belt land meets the exceptional circumstances to justify release from the Green Belt. Central Beds has been acknowledged by Luton BC and its Inspector as being the "best fit" to meet Luton BC's unmet needs.

There has been slow but definite progress on extending the Chilterns AONB south of the A505, which includes the proposed land allocations for housing East of Luton, than was originally stated by NHDC in ED89 of February 2018. The argument made by NHDC against this proposal was based purely on the length of time taken until 2018 and the likelihood of further delays as due process is followed by Natural England and the Chilterns Conservation Board. However, in the past year or so progress has been much faster and the timescales for a final AONB decision could well be much the same now as for the various detailed planning procedures and approvals that would have to be undertaken if the go-ahead is given for the east of Luton housing developments. We can elaborate on this if that would be helpful.

Yours Sincerely

David Dorman

Roy Parker