

ResponseMatter24-TheProposed'East of Luton'Sites-Pt1-CarolynCottier-21Feb2020

Name of Representor: Carolyn Cottier

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Title: Response to Matter 24 – the proposed 'East of Luton' sites – Part 1

The Inspector raises some interesting points, but should we not be asking the following questions to initially frame those points?

- **What housing capacity does Luton have already within its own border?**
- **What is Luton's capacity for holding suitable dwellings at the current time?**
- **What alternatives to the "East of Luton" Sites exist within Luton's own border?**
- **Where are such alternatives?**
- **Is Luton's current capacity of ratio to need, already enough to stall requests to over-spill into neighbouring territory?**

We answer all of these questions using numerically accountable hard evidence. This was accessible repeatable research undertaken via Luton Council's Planning Portal.

If you too would like to access Luton's Planning Portal it is here:

<https://planning.luton.gov.uk/online-applications/>

Firstly we undertook a detailed count of all of the planning applications for residential dwellings from the start of the NHDC and Luton Local Plan periods up until the current day.

We display the results in two ways.

Firstly we created an excel spreadsheet showing the following details per application: planning application reference code, name and address of the site, number of residential units upon it, breakdown of residential units by type (flat/ house and number of bedrooms per unit), receipt date of application, validation date, and final outcome/ or pending.

Secondly we summarised the numbers of residential dwelling applications by month and as sub-totals. These summary counts are displayed in the spreadsheet. The annual totals are shown in the chart beneath.

So affordable future residential dwellings already approved, already built and to be built from January 2011- February 2020 already factually calculate as 15,265 dwellings.

The grand total of existing viable options for the Plan period to date is 15,265 residential dwelling applications – shown by available land already in the planning portal alone.

This plus a small fraction of some additional options we will discuss in Part 2, is more than enough to satisfy Luton's own housing needs within its own borders.

Since this number satisfies and is greater than any housing need stated by Luton Council for its plan period, the unmet need is proven as mythological in basis and perpetuated erroneously.

Because the dwelling numbers exist already inside the planning system as live applications already passed, or being considered, we can assume that the land for them to exist upon IS AVAILABLE.

Having overlooked this represents huge failings on behalf of both Luton Borough Council's Planning Department and North Hertfordshire District Council Officers.

Since both Councils have wasted hundreds of thousands of pounds arguing over how to fulfil "an unmet housing need" when it was already fulfilled and hiding under their noses in plain sight. We recommend they be rigorously reprimanded.

Did it really have to take public representors to take the initiative and count what was actually already available in the form of existing planning applications for housing?

Council officers could have done this at the outset, could they not?

This precisely why Government Guidance prescribes that an inventory of land in the form of a HELAA be made so that this register can underpin and inform the later SHLAA. Note: Inspector has been repeatedly reminded of this necessity numerous times since the initial round of hearings.

First HELAA, later SHLAA.

Please press "suspend button" in order that a HELAA register to be made. Make them count how many land sites they REALLY already have, and order that they list them ALL first.

Make all four councils in the housing market area do this.

The results will be surprising and save A LOT of money I guarantee.

I shall remind you; as Planning Inspector you have the wonderful luxury of knowing every minute you spend is a paid minute. And I am sure even then you question whether it's worth it ...Us, on the other hand, for us every minute is a wasted minute. And they have misappropriated thousands and thousands of hours of our time, money and patience in this unpaid untangling of their witless incompetence. So compensation in some form or another, *will* be something we shall absolutely pursue.

The final result of what residential dwellings are in Luton's Planning portal since 2011 is this:

	1 Bed	2 Beds	3 Beds	4 Beds	Unspecified Type (so a mixture of different sizes)	TOTAL
2020	117	150	53	10	1251	1581
2019	604	876	154	122	166	1922
2018	1673	1090	206	64	0	3033
2017	325	270	34	17	1550	2196
2016	326	124	23	7	1031	1511
2015	129	100	88	35	550	902
2014	355	50	51	6	1604	2066
2013	143	67	21	12	130	373
2012	106	159	4	4	448	721
2011	128	66	54	7	705	960
	3906	2952	688	284	7435	15265

We have added Power Court as 500 in 2016

Please see the housing plan numbers summary in the Planning Portal Spreadsheet. This gives other details. Then for further details still, look up the reference number in the planning portal yourself.

We have screened for repeats. We avoided these by vigilantly removing them as we went along. I am sure though that these do not materially affect the overall picture that has emerged.

CONCLUSIONS

The conclusions for Matter 24 – the proposed 'East of Luton' sites are:

Inspector's Question 24.1: The three 'East of Luton' sites are proposed to deliver 1,950 new homes to assist in addressing the unmet housing needs of Luton Borough, which is identified as being 9,300 homes of the Luton plan period of 2011 to 2031.

Conclusion 24.1: Where is the *unmet housing need* if Luton already have more than their total identified number inside its own planning portal as existent applications? And we are only halfway through the Plan period...so even more sites yet will likely come forward over the remaining 10 years to offer yet even further fulfilment of these, in-excess of their over-stated numbers.

Inspector's Question 24.1.d: Without the 'East of Luton' sites, are there any realistic alternative options (with a reasonable likelihood of being delivered) for addressing Luton

Borough's unmet housing need, bearing in mind the approach being taken in the Central Bedfordshire Local Plan and the current position in relation to the examination of that plan?

Conclusion 24.1.d: Yes the **15,265 dwellings in the planning portal since 2011 up until the current time.**

This is not however to distract from Luton's over-inflated housing need numbers in the first place; see David Dorman's papers.

However for anyone still wishing to cling onto the originally stated Luton OAN numbers - also see my next paper (Part 2) for the sites that WE HAVE ADDITIONALLY FOUND ON TOP OF THE 15,265 DWELLINGS – via:

- The Luton Empty Residential Housing Listings**
- The Luton Empty Commercial Property Listings**
- Luton Vacant Brownfield Sites**
- The Land Sites identified in the adopted Luton Plan**

Inspector's Question 24.1.e: The Sustainability Appraisal does not consider land or sites outside of North Hertfordshire.
Should it?

Conclusion 24.1.e: In regards to Luton's "need" this is now a mute-point since Luton has its need well satisfied within its own borders already. However the Sustainability Appraisal should be re-written, only after the exercise we have undertaken for Luton is reproduced for the other three housing market areas' districts and boroughs also.

This would ensure overall accuracy and real figures in the first place, not fudged concocted emergencies and lucrative "SOSs".

There are some further options outside of Luton's border however, if they had have been needed.

Land by the M1-A6-11A in Central Bedfordshire has now been allocated for 7,000 new dwellings. This certainly offers better placement in terms of accessibility.

The additional advantage of this site is its total absence of two competing Infrastructure Projects of National Significance in the touching/ adjacent field – unlike 'East Luton's'.

New Century Park and two dual carriageways PLUS the SEPARATE Airport Terminal Two Building, along with the Airport Expansion aimed at tripling its capacity to rival Gatwick is reason enough to avoid the 'East of Luton' area.

There are also many other reasons to avoid it.