



Representees: Carolyn Cottier, Linda Cottier, Barry Cottier, Zade Cottier-Wood. Date: 13th September 2020
Statement: Examination North Hertfordshire District Council Local Plan (2011-2031)
Response: ED194 Updated Schedule of Further Matters, Issues and Questions (14th August 2020)

RESPONSE: Matter 21 – the objective assessment of housing need (‘the OAN’) & the housing requirement

The Objectively Assessed Need and Housing Requirements as By-Product of Certain Factors

Matter 21 – the objective assessment of housing need (‘the OAN’) and the housing requirement

21.4 Has the indicative OAN figure for Luton been arrived at correctly/on a robust basis and are the key assumptions made reasonable?

21.5 In the light of this, has there been a ‘meaningful change in the housing situation’ in Luton?

21.6 If there has been a ‘meaningful change in the housing situation’ in Luton, should the East of Luton sites be modified or deleted from the Local Plan?

INTRODUCTION

Inspector for the Luton Local Plan (2011-2031), Jeremy Youle said in his Final Report dated August 2017 that the Objectively Assessed Needs (“OAN”) figures for Luton were of unclear indication. He stipulated they be recalculated following the Plan’s adoption, and before the next early review scheduled two years on. Since adoption, whilst the SHMA has been superficially updated with its Brownfield site lists slightly lengthened, the OAN for the Housing Market Area (“HMA”) has not been recalculated. However preparation for the Luton Local Plan review is currently underway.

We ask that the Inspector view against this general backdrop of uncertainty as noted by his colleague, when asking whether the indicative OAN figure for Luton has been arrived at correctly/on a robust basis and whether the key assumptions made are reasonable.

This and the fact that there has been serious and acrimonious disagreement between Central Bedfordshire and Luton; some of it relating to the housing capacity issue but also several other disagreements which ended up in Court. Details of the legal challenges each Council has brought against the other, are detailed in the Inspector’s Final Report also.



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The capacity of Luton to provide for new housing

37. Central Bedfordshire consider that Luton has under-estimated the housing capacity available within its boundary. Having taken this view, they have commissioned their own separate assessment of Luton's capacity. This is not in itself an indication of a good working relationship. However, the disagreement is principally about a soundness issue. In terms of the Duty, the evidence indicates that Luton's work on housing capacity was shared and discussed at several joint meetings. Overall, the engagement here has been satisfactory, even though it has not led to agreement with CBC.

Resource available at:

<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/adoption/Luton-Local-Plan-2011-2031-final-Inspectors-report.pdf>

What amount of land Luton said it truly had within its own boundaries suitable for development, was what Central Beds was disputing.

Central Beds commissioned its own study seeking to clarify this. Jeremy Youle commented such "disagreement is principally about a soundness issue".

North Hertfordshire has failed to produce any accurate assessments to reflect these uncertainties, although they should do so because they share the same HMA and the sheer volume of public objections arising from concerns about the east of Luton area during consultations have frequently referred to this. Also the fact that two nationally significant infrastructure projects ("NSIP") are competing for space in the fields directly adjacent to

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105. Fourthly, if an updated SHMA were to lead to a different, and potentially higher, OAN, the effects would largely influence planning decisions about housing numbers outside Luton, particularly in neighbouring Central Bedfordshire. This is because, on any realistic assessment, the housing capacity of Luton is significantly lower than the OAN and because, both geographically and functionally, **Central Bedfordshire is clearly the most obvious candidate to accommodate a significant proportion of that unmet need. In this context the SOCG with CBC confirms that a new joint SHMA will inform the new Central Bedfordshire Local Plan. This will cover the period 2015 to 2035. Consequently, the OAN for the HMA is likely to be revisited in the near future. The two Councils have agreed that any changes to the OAN for Luton itself would need to be considered in the next Luton Local Plan.**

the housing site, renders this site of particular interest under the Planning Act 2008, since



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it is considered to be part of the “area of development” upon land connected and adjacent to both NSIPs.

It is a serious problem that an updated Luton OAN never occurred and that the inaccuracies in the original indicative figure remain up to this day. They could persist into the current review and misinform well into the future. These have persistently fed into and misinformed the North Hertfordshire Local Plan, which has consequentially duplicated many of its inaccuracies, along with an ample amount of its own.

The misperceptions surrounding Luton’s Unmet Need are easy enough to unravel, if the motivations behind leaving the OAN over-inflated and incorrect are removed.

SECTION I

The Luton Adopted Plan (2011-2031) Para. 4.5 explains that the Functional Housing Market Area (“FHMA”) includes the following:-

- **All of Luton Borough**
- **Significant portion of Central Bedfordshire**
- **Some of North Hertfordshire**
- **Aylesbury Vale District**

Luton says that the net additional dwellings required for this WHOLE FHMA are 31,800 over the plan period (2011-2031) and are divided thus:

13,400 dwellings belong within Central Bedfordshire

200 dwellings within North Hertfordshire

400 dwellings within Aylesbury Vale

Which adds up to 14,000 in total.

31,800 net minus 14,000 leaves outstanding 17,800 for Luton to deliver.

So it is an observation that the percentage shouldered by each authority is respectively highest for Luton and looks like this:

55.974% - Luton

42.138% - Central Bedfordshire

0.628% - North Hertfordshire

1.257% - Aylesbury Vale



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Why does Luton take such a lion's share of it?

Luton's Adopted Plan in Policy 2.26 commits to providing only 8,500 dwellings within the borough as its contribution to full objectively assessed need for the market and affordable housing requirements. This will be done through allocations listed as:

- High Town development
- Town Centre/ Power Court regeneration
- Former employment area/ Napier Park
- Neighbouring local authorities' contributions

Luton Local Plan's Policy 2.26:

2.26 8,500 dwellings will be provided within the borough and will contribute towards meeting the full objectively assessed need for market and affordable housing requirements through allocations, development at High Town, regeneration of the town centre (Power Court) and former employment area (Napier Park). Neighbouring local authorities need to help meet Luton's unmet market and affordable housing needs in accordance with the 'Duty to Cooperate'.

Luton has a far greater capacity than only 8,500 as is evidenced by the materially existent residential planning applications surmounting 16,000 in number - viewable within Luton Borough's Planning Application listings. See the work of Barry Brown for more details, dates and the reference numbers for these. They are taken from validated applications starting January 2011 until the current time.

So the claim of only having capacity for 8,500 is bogus.

Luton already has twice that in their planning application registries.

Furthermore why does Luton and NHDC state Aylesbury is in the FHMA when Aylesbury says it is in an entirely different housing market area altogether?

Additionally whilst plan periods for North Herts and Luton do match, Aylesbury Vale's and Central Bedfordshire's do not; they are totally different.

Aylesbury Vale	2013 – 2033
The Central Bedfordshire	2015 – 2035



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So if we use the most recent figure of 9,322 as preferred by the Luton Inspector, then we can immediately see it is 822 dwellings higher than the originally disclosed Luton capacity of 8.500.

We think this to be very important in relation to the question “Has the indicative OAN figure for Luton been arrived at correctly/on a robust basis and are the key assumptions made reasonable?”

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110. Given Luton’s administrative boundary fairly closely aligns with the urban area, there is only a limited supply of potential land for housing. The Plan states that 6,700 new homes will be provided for, reflecting the availability of land. However, the more recent Strategic Housing Land Availability Assessment (SHLAA) of July 2016 refers to a capacity of 9,322 between 2011 and 2031. This includes completions in the first few years of the plan period.

However we additionally want to discuss the untrue basis of both figures, higher and lower.

The reason given in Policy 4.5 as to why Luton is relying more upon the lower capacity figure is due to what it claims are “uncertainties”. However these uncertainties are more obscuration due to not having produced any Housing Economic Land Availability Assessment (“HELAA”) which would clarify such uncertainties beyond doubt.

It would display the amount of land within the borough as one large register. The reality is that a huge quantity of empty commercial properties are held within Luton, many are Council owned, but the majority of which are never revealed in the Brownfield Register, Local Plan or any other submitted documents. For all intents and purposes they are being hidden.

This information was refused to Carolyn Cottier when she repeatedly asked Cllr Tom Shaw Executive Member and Housing portfolio Holder for Luton Council to provide it. Her requests began in early 2020 and were still being repeated to no avail up until September 2020.

Ms Cottier knows something is being hidden, when a Council official declines to provide information, that is 1) considered to be on public record and 2) should already be compiled under various legal duties and 3) should already have been published, and 4) is being justifiably requested for use in current public inquiries.



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So then we all need to ask some very serious questions as to why access to it is being deliberately and desperately obstructed.

Ms Cottier eventually did obtain this information by another legitimate route. She raised an eyebrow, when she saw the staggering 1,382 large commercial properties which were listed as lying completely empty, many for over twenty years.

She manually went through them all auditing them one by one. Marking against the sites listed which ones were a) in the Luton Local Plan, b) its SHMA and c) its SHLAA. A colour coded listing was then produced of all these empty commercial properties.

Copies of her communication with Luton Borough Council and the evidence eventually obtained after lengthy battle, is provided in the Addendums.

The sheer level unnecessary withholding of such basic information was of mythological proportion and Ms Cottier wondered if she were seeking something of a holy grail!

However the revelations it yielded were explanation enough in and of themselves, as to why it had remained firmly asphyxiated outside of the Luton Local Plan's supporting evidence base!

If this could be said of Luton, then the same might apply to North Herts.

MATTERS-29,21,22-ADDENDUM-Land&AssetsOwnedByNHDC-Apr2017.xls

MATTERS-21,22,29-ADDENDUM-Property&LandSuppliesInGov'sProperty&LandAssetDatabase-15Sep2020.docx

Proves that total land is above and beyond anything listed in the Council's released brownfield list.

MATTERS-29,21,22-ADDENDUM-NHDC Brownfield Register 2019 update.pdf

So Luton and North Herts must be told to include these "hidden register treasures", in the current NHDC Local Plan Submission AND the Luton Local Plan Review evidence base and new submission.

Both councils must be ordered to create the long lost Housing and Economic Land Availability Assessment ("HELAA") – which has been missing since the dawn of time from Luton's and also North Herts' entire Plan-making, decision-making and examination processes.

It is then everyone can talk numbers.



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21.4 Has the indicative OAN figure for Luton been arrived at correctly/on a robust basis and are the key assumptions made reasonable?

Robust basis is missing and so the key assumptions are unreasonable.

21.5 In the light of this, has there been a 'meaningful change in the housing situation' in Luton?

In the light of a missing robust basis for basis of these key assumptions the change would be that more land is available for the housing situation to be addressed not less, so the buffer should be negative per cent to reflect the extra land out there.

21.6 If there has been a 'meaningful change in the housing situation' in Luton, should the East of Luton sites be modified or deleted from the Local Plan?

The is no requirement for the East of Luton site to be in the Plan as this paper and other papers such as Dorman's, Norgan's and Brown's prove.

All of this could have been avoided by the production of a thorough land register in the first place.

It is against Planning Practise Guidance not to have a HELAA produced as evidence and for due process of Local Plan making. These assessments are required by the National Planning Policy Framework.

Aylesbury Vale, part of the North Herts' FHMA explains in its Aylesbury Vale Local Plan (2013 - 2033) upon page 277, the importance of the Housing and Economic Land Availability Assessment ("HELAA"):

"Housing and Economic Land Availability Assessment (HELAA)

A key component of the evidence base to support the delivery of sufficient land for housing and employment to meet the community's need for more homes. The HELAA is an assessment to identify land for housing and assess the deliverability and developability of sites. These assessments are required by the National Planning Policy Framework. Housing and Economic Development Needs Assessment (HEDNA) A Housing and Economic Development Needs Assessment (HEDNA) is a study required by Government of Local Planning authorities to inform Local Plans in terms of housing targets, housing need, demand, migration and commuting patterns and the development of planning and housing policy as well as the future quantity of land or floorspace required for economic development needs. For Aylesbury Vale the HEDNA has been undertaken by Opinion Research Services (ORS) for the Central Bucks HMA."

[Aylesbury Vale Local Plan (2013 - 2033), page 277]



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So back to the 2016 SHLAA and it's identified potential capacity of 9,322 over the plan period. Luton says, "However, some of this identified capacity is unlikely to be developed over the plan period due to market conditions and other uncertainties. Consequently, a realistic assessment is that there is sufficient capacity to deliver 8,500 dwellings."

Anything but! There has been a huge number of additional office conversions occurring throughout Luton, in addition to those OAN quotas disclosed in the adopted Local Plan.

And the recent changes to Use Classes Order and new ease of conversion from commercial to residential, now means all of those commercial properties standing empty for decades have suddenly become hot property and rich pickings for developers and locally driven neighbourhood development planners. So perhaps this is exactly the kind of information that some people would want to keep for themselves.

Plan Policies as Odds with Each Other:

Luton Local Plan's Policy 12.13:

Managing a Supply of Housing Land

12.13 Appendix 5 of this Plan sets out further details for monitoring delivery of the housing requirement of 8,500 dwellings (425 dwellings per annum). Based on an annual requirement of 425 dwellings per annum, there has been a shortfall in completions of 98 dwellings between 2011 and 2016.

The aim is to recover this shortfall over the period 2016-21- i.e. at 445/year x 5 = 2,223 dwellings.



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Luton Local Plan's Policy 4.5:

4.5 It proposes that the objectively assessed housing need for the borough is 17,800 net additional dwellings and 31,800 net additional dwellings in the Functional Luton Housing Market Area over the plan period (2011 - 2031, of which, based on a pro-rata split based on population, 200 dwellings fall within North Hertfordshire and 400 dwellings within Aylesbury Vale and the balance of 13,400 dwellings within Central Bedfordshire) as evidenced by the Luton & Central Bedfordshire SHMA update of summer 2015, which provides more information/ analysis.(4)

The Functional Luton Housing Market Area (shown on the accompanying plan (5) taken from the report, Housing Market Areas in Bedfordshire and surrounding areas Report of Findings, December 2015) includes all of Luton Borough, a significant proportion of Central Bedfordshire, and some of North Hertfordshire District and Aylesbury Vale District.

The 2016 SHLAA identified a potential capacity of 9,322 over the plan period. However, some of this identified capacity is unlikely to be developed over the plan period due to market conditions and other uncertainties. Consequently, a realistic assessment is that there is sufficient capacity to deliver 8,500 dwellings. This, therefore, is the housing requirement for the plan period. Based on the objectively assessed housing needs and the lack of housing land to fully meet this need, there is a shortfall of 9,300 net additional dwellings in the borough

SECTION II

Applying Data from ONS Government Datasets for New Homes Built by Local Authority to North Hertfordshire's Objectively Assessed Needs

Data for residential dwellings completed by local authorities can be found at the Government's live datasets.

The source of the data applied is the Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

Luton Unitary Authority starts from 2004/05.

Central Bedfordshire Unitary Authority data starts from 2010/11.

North Hertfordshire District data starts from 2010/11



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The table below shows number of dwelling completed by year per authority:

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	Total
Central Bedfordshire UA	NA	NA	NA	NA	NA	NA	1,130	1,170	1,000	1,030	1,510	2,020	1,390	1,580	1,520	-	12350
Luton UA	290	230	250	290	250	190	280	210	320	90	140	210	230	420	250	-	3650
North Hertfordshire	NA	NA	NA	NA	NA	NA	170	280	290	90	60	240	370	250	170	-	1920

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

Luton completed 1,250 dwellings (2010/11-2015/16)

Luton completions by year:

10/11	11/12	12/13	13/14	14/15	15/16
280	210	320	90	140	210

In those two following years a further 650 dwellings were built.

Luton completed 650 dwellings (2016/17-2017/18)

16/17	17/18	18/19
230	420	250

So $9,750 + 650 = 10,400$ / capacity for Luton's OAN.

So by looking at the first tiny chart from 2010/11 until 2015/16 - although Luton said it only had capacity for 8,500, we now know it also built 1,250 additionally.

$8,500 + 1,250$ is 9,750 and not 9,322 as the Inspector raised the figure to. It is in fact 428 more than the Inspector's raised figure. So the Inspector didn't raise it enough when he quoted in his final report the updated SHLAA July 2016.



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Removing these 1,250 new home completions from the 9,322 stated capacity- as proposed by Luton’s own SHLAA July 2016- there remains only 8,070 – which does not correlate with either of the figures in the Plan. The correct number would be 9,750 for stated capacity.

Luton also continued to build in the two years after that and before the Plan was adopted. See second mini-chart above.

Plus Central Beds, Luton Council and Luton Inspector all confirm there are the 7,400 that Central Beds is providing.

So altogether that makes 17,800 EXACTLY.

8,500 (Luton’s lowest stated capacity) +1,250 (built 2010/11-2015/16) +650 (built 2016/17- 2018/19) + 7,400 (From CBC) = 17,800.

17,800 is exactly the number that Luton says it will need to build by the end of the plan period in order to have met its full target of 17,800.

Without help from anywhere except Central Beds which was the Luton Plan’s preferred route and stated to be “best fit” for the unmet need by the Luton Inspector.

In those year 2018/19 a further 250 dwellings were built.

Luton completed 250 dwellings (2018/19)

16/17	17/18	18/19
230	420	250

This extra 250 completed homes remain unrequired for our Luton need figures to be met and remain extra to that 17,800.

So these 250 can be used to balance the 150 homes that North Herts seeks to claim as its own portion, from the proposed east of Luton Site (which is divided as 1,950 for Luton and 150 for North Herts). North Herts wants the east of Luton Site declassified from the Green Belt “just in case” it may find some type of exceptional circumstance in the future. Maybe. Just in case, as you never know...



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We do know however, Luton can now help North Herts with its unmet need.

Luton has so many derelict and empty properties, they are not even counting these additional options:

- 1) ADDITIONAL 16,000 residential applications already validated**
- 2) ADDITIONAL building in Luton already taken place since 2018 until 2020**
- 3) ADDITIONAL land-sites on top of what was in the Local Plan.**
- 4) All of the empty commercial properties**
- 5) Undeclared Brownfield sites that we have all the registers of**
- 6) The empty houses in the Empty Housing Strategy**

What is the total available land if that were to be compiled through a HELAA?

Either way, for the purposes of this Examination, 2,000 lacking capacity gets immediately reduced to minus ZERO.

So the 1,950 for Luton's unmet need to which North Herts is clinging, no longer exists.

And Luton can help North Herts with the extra 150 for that site, thrown in as freebie no problem – they've been built already.

Using the real figures as published in the Luton Adopted Plan, written final report statements by the Luton Inspector and ONS completion data from DCLG a tiresome and longstanding fallacy is firmly debunked.

There is nothing they can do to revive it. It's dead in the water.

They MISCALCULATED.

ADDITIONAL COMMENT

Whilst dismantling the construct of Luton Unmet Need it must firmly stated, that this does not mean we support the original OAN figures as being accurate in any way.

It is our opinion that the North Herts and also Luton Local Plan's OAN figures have always been wrong and grossly over-inflated.

This has been argued convincingly and logically by numerous other representors including David Dorman (Mangrove Green), Reginald Norgan (Graveley), Save Our Green Belt (North Herts) and many others.



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In this paper we are simply saying that EVEN IF THE OAN FIGURES WERE TRUE (WHICH THEY ARE NOT) but presuming the figures were to stay as they are and never be put to rights, then we can still prove that – the east of Luton requirement is ENTIRELY unjustified and not of robust basis.

The Luton Inspector said, this higher capacity figure of 9,322 is higher because it included completions within Luton during the first few years of the plan period. However it gets reduced into negative numbers yet further when we apply already built dwellings in the Central Beds section of the FHMA too! This we will do as a further correctional calculation in Section III.

SECTION III

In some respects all of this is a moot point, because the Luton Inspector already said the OAN needed to be done again anyway, because he had no confidence in it. Also the material fact of 16,000 existing residential planning applications within Luton's own curtilage swamps many times over ANY unmet figure.

Because 16,000 residential applications have already been listed and validated by Luton Council there are 5,600 EXTRA residential dwellings recorded as available for the delivery period, not a deficit of 2,000! The 2,000 being what NHDC is trying to use as justification for the retention of the East of Luton Site.

16,000 MINUS 10,400 EQUALS 5,600 EXTRA.

5,600 EXCESS.

So really Luton doesn't really need all of the houses it is getting from Central Beds. In fact Central Beds should be helping North Herts with its housing need instead.

Presuming that North Hertfordshire still wants to claim Luton has an unmet need, then we have further counter facts to produce too.

If Luton is being given 7,400 by Central Bedfordshire, that leaves 12,400 of the Luton OAN figure to be met over 2011 - 2031.

The CBC Draft Local Plan, plans for a range of between 20,000 and 30,000 new homes over the period to 2035.



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All of these figures are for the Central Beds Plan’s time-frame period of 2015 – 2035.

So any dwellings built and completed in Central Beds before 2015 are within the Functional Housing Market Area for time periods of both Luton’s and North Herts’ local Plans but not for Central Bedfordshire’s. Hence these deliveries must be shared upon a pro-rata basis towards the 31,800 net additional dwelling figure for the North Hertfordshire and Luton’s requirements.

They are still a part of the total Functional Housing Market Area’s contribution and must be deducted from the North Herts and Luton’s 2011-2031 OAN figures on the same pro-rata basis used to calculate the original 31,800 total FHMA figure in the first place.

This matches para 4.5 in the Luton Adopted Plan which of the 31,800 figures says, “of which, based on a pro-rata split based on population, 200 dwellings fall within North Hertfordshire and 400 dwellings within Aylesbury Vale and the balance of 13,400 dwellings within Central Bedfordshire) as evidenced by the Luton & Central Bedfordshire SHMA update of summer 2015, which provides more information/ analysis.(4) ”

The new homes completed within CBC during years 2010/11 – 2015/16 – i.e. for the first five years of the NHDC and Luton plans, must be included as contributory to that part of the FHMA OAN number.

We will use this data to see the number of dwellings completed by Central Bedfordshire UA and then apply these delivered dwellings to Luton unmet need figure.

These are not additional contributions towards the total Central Beds OAN 30,400 which has already been stated to be a separate quantity for a separate time period.

The following completions are extras, as their delivery fell outside of the Central Bedfordshire’s Plan period. They occurred well before it.

Central Beds dwelling completions by year:

10/11	11/12	12/13	13/14	14/15	15/16
1,130	1,170	1,000	1,030	1,510	2,020



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That totals **7,860 additionally completed dwellings** in the FHMA during the period from 2010/11 until 2015/16.

Or from 2011/12 until 2014/15 - 4,710 dwellings were completed.

This 7,860, or 4,710 (depending upon which time-frame you draw the line at) - impacts the total FHMA figure for the Luton Plan period. It reduces it on the same pro-rata basis that the original 31,800 total Luton-Central Beds-North Herts-Aylesbury "FHMA" was calculated in the first place.

Yet again ANY Luton unmet need figure, be it 762, 1,188 or 2,000, gets cancelled and then leaves thousands of extra houses present, as they have already been delivered.

Luton says it needs to build 425 dwellings per year. But this is based upon the need from the original "31,800 total Luton-Central Beds-North Herts-Aylesbury -FHMA" figure.

The Local Plan claims in para. 12.13 "Managing a Supply of Housing Land" that between 2011 and 2016 "there has been a shortfall in completions of 98 dwellings."

DCLG data shows that between in Luton:

2011-2015/16 1250 houses were built.

2016/17 – 18/19 900 houses were built.

If the same FHMA area is used for "dwelling completions" as what was used for "need calculations" then there's an excess of building not a shortfall.

The Inspector's report stated Central Bedfordshire Council disagreed with the soundness of the Luton OAN figure.

CDC also commissioned a study to show that this was an underestimation of land available within Luton's own boundaries.

AFTER UNRAVELLING THIS MESS I THINK WE SHOULD ALL BE ASKING HOW DID THEY ARRIVE AT THE FHMA FIGURE OF 31,800 in the first place..?

<THE END>



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APPENDIX 1: Data from ONS Government Datasets for New Homes Built by Local Authority

Luton UA data starts from 2004/05.

Central Bedfordshire UA data starts from 2010/11.

North Hertfordshire data starts from 2010/11

Source

Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

Total number of new homes built (Completions) by year

	Total no/ home built (completions) 10/11 – 18/19	Total no/ home built (completions) 04/05 – 09/10	Total no/ home built (completions) 10/11 – 14/15	Total no/ home built (completions) 15/16 – 18/19
Central Bedfordshire UA	12350	NA	5,840	6,510
Luton UA	2150	1500	1040	1110
North Hertfordshire	1920	NA	890	1030

Total number of new homes built (Completions)



Representees: Carolyn Cottier, Linda Cottier, Barry Cottier, Zade Cottier-Wood. Date: 13th September 2020
 Statement: Examination North Hertfordshire District Council Local Plan (2011-2031)
 Response: ED194 Updated Schedule of Further Matters, Issues and Questions (14th August 2020)

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	Total
Central Bedfordshire UA	NA	NA	NA	NA	NA	NA	1,130	1,170	1,000	1,030	1,510	2,020	1,390	1,580	1,520	-	12350
Luton UA	290	230	250	290	250	190	280	210	320	90	140	210	230	420	250	-	3650
North Hertfordshire	NA	NA	NA	NA	NA	NA	170	280	290	90	60	240	370	250	170	-	1920

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

Total number of new homes built (Starts)

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	Total
Central Bedfordshire UA	NA	NA	NA	NA	NA	NA	910	510	160	1,360	1,540	2,110	1,740	1,470	1,190	-	10990
Luton UA	450	450	290	260	180	190	350	210	320	300	160	190	320	390	400	-	4460
North Hertfordshire	NA	NA	NA	NA	NA	NA	260	270	290	90	230	350	180	100	260	-	2030

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

New homes built by council (Completions)



Representees: Carolyn Cottier, Linda Cottier, Barry Cottier, Zade Cottier-Wood. Date: 13th September 2020
 Statement: Examination North Hertfordshire District Council Local Plan (2011-2031)
 Response: ED194 Updated Schedule of Further Matters, Issues and Questions (14th August 2020)

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	Total
Central Bedfordshire UA	NA	NA	NA	NA	NA	NA	0	0	0	0	0	0	0	0	0	-	0
Luton UA	0	0	0	0	0	0	0	0	0	0	0	0	10	10	0	-	20
North Hertfordshire	NA	NA	NA	NA	NA	NA	0	0	0	0	0	0	0	0	0	-	0

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

New homes built by council (Starts)

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	Total
Central Bedfordshire UA	NA	NA	NA	NA	NA	NA	0	0	0	0	0	0	0	0	0	-	0
Luton UA	0	0	0	0	0	0	0	0	0	20	0	0	0	0	0	-	20
North Hertfordshire	NA	NA	NA	NA	NA	NA	0	0	0	0	0	0	0	0	0	-	0

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

New homes built by housing associations (Completions)



Representees: Carolyn Cottier, Linda Cottier, Barry Cottier, Zade Cottier-Wood. Date: 13th September 2020
 Statement: Examination North Hertfordshire District Council Local Plan (2011-2031)
 Response: ED194 Updated Schedule of Further Matters, Issues and Questions (14th August 2020)

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	Total
Central Bedfordshire UA	NA	NA	NA	NA	NA	NA	380	320	200	110	300	260	180	270	230	-	2250
Luton UA	60	30	40	10	40	70	130	30	180	20	30	60	10	110	70	-	890
North Hertfordshire	NA	NA	NA	NA	NA	NA	30	10	50	20	10	10	80	50	0	-	260

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

New homes built by housing associations (Starts)

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	Total
Central Bedfordshire UA	NA	NA	NA	NA	NA	NA	270	190	150	190	270	360	280	190	230	-	2130
Luton UA	100	20	0	50	0	70	150	60	20	110	60	110	40	90	250	-	1130
North Hertfordshire	NA	NA	NA	NA	NA	NA	10	60	10	0	20	100	20	0	30	-	250

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

New homes built by private developers (Completions)



Representees: Carolyn Cottier, Linda Cottier, Barry Cottier, Zade Cottier-Wood. Date: 13th September 2020
 Statement: Examination North Hertfordshire District Council Local Plan (2011-2031)
 Response: ED194 Updated Schedule of Further Matters, Issues and Questions (14th August 2020)

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	Total
Central Bedfordshire UA	NA	NA	NA	NA	NA	NA	750	850	800	920	1,210	1,760	1,210	1,310	1,290	-	10100
Luton UA	230	200	210	290	210	120	150	180	140	70	110	150	210	310	180	-	2760
North Hertfordshire	NA	NA	NA	NA	NA	NA	150	270	250	80	40	230	290	200	170	-	1680

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

New homes built by private developers (Starts)

	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	Total
Central Bedfordshire UA	NA	NA	NA	NA	NA	NA	640	760	850	1,160	1,270	1,750	1,470	1,280	960	-	10140
Luton UA	350	430	280	210	180	120	200	150	70	170	100	70	280	300	160	-	3070
North Hertfordshire	NA	NA	NA	NA	NA	NA	250	210	80	90	210	250	160	100	230	-	1580

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

More details about the source of this data and definitions of its datasets:

New homes built by council (Completions)



Representees: Carolyn Cottier, Linda Cottier, Barry Cottier, Zade Cottier-Wood. **Date:** 13th September 2020
Statement: Examination North Hertfordshire District Council Local Plan (2011-2031)
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The number of new build homes completed by the council in the area in the time period. A dwelling is regarded as complete when it becomes ready for occupation or when a completion certificate is issued whether it is in fact occupied or not.

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

New homes built by council (Starts)

The number of new build homes started by the council in the area in the time period. A dwelling is counted as started on the date work begins on the laying of the foundation.

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

New homes built by housing associations (Completions)

The number of new build homes completed by housing associations in the area in the time period. A dwelling is regarded as complete when it becomes ready for occupation or when a completion certificate is issued whether it is in fact occupied or not.

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

New homes built by housing associations (Starts)

The number of new build homes started by housing associations in the area in the time period. A dwelling is counted as started on the date work begins on the laying of the foundation.

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

New homes built by private developers (Completions)

The number of new build homes completed by private developers in the area in the time period. A dwelling is regarded as complete when it becomes ready for occupation or when a completion certificate is issued whether it is in fact occupied or not.

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

New homes built by private developers (Starts)



Representees: Carolyn Cottier, Linda Cottier, Barry Cottier, Zade Cottier-Wood. **Date:** 13th September 2020
Statement: Examination North Hertfordshire District Council Local Plan (2011-2031)
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The number of new build homes started by private developers in the area in the time period. A dwelling is counted as started on the date work begins on the laying of the foundation.

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

Total number of new homes built (Completions)

The number of new build homes completed in the area in the time period. A dwelling is regarded as complete when it becomes ready for occupation or when a completion certificate is issued whether it is in fact occupied or not.

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)

Total number of new homes built (Starts)

The number of new build homes started in the area in the time period. A dwelling is counted as started on the date work begins on the laying of the foundation.

This data starts from 2004/05. Source: Department for Communities and Local Government (DCLG) Live tables, Table 253 [Source](#)