



WHITE PEAK Planning

Matter 3 Hearing Statement: The Housing Strategy: The Objectively Assessed Need for Housing and the Housing Requirement (Policy SP8)

North Hertfordshire Local Plan Examination

On behalf of Bloor Homes and The Crown Estate

November 2017

Ref: 2012.002

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Authorised for and on behalf of White Peak Planning Ltd.

A handwritten signature in black ink, appearing to read 'Rob White', written over a horizontal line.

**Rob White
Director**

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.



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1.0 Introduction

1.1 Background

- 1.1.1 Bloor Homes and The Crown Estate control a substantial tract of land within the area identified in the Local Plan submission version as the Land East of Luton allocation (refs: EL1, EL2 and EL3).
- 1.1.2 Bloor Homes has submitted an outline planning application to North Hertfordshire District Council (NHDC) for the majority of sites EL1 and EL2 (ref: 17/00830/1) for up to 1,400 new homes.
- 1.1.3 The Crown Estate has submitted an outline planning application to NHDC (ref: 16/02014/1) for 660 new homes at Site EL3.
- 1.1.4 The application documents can be viewed on the Council's website via the following link: <http://pa.north-herts.gov.uk/online-applications/>.
- 1.1.5 Bloor Homes and The Crown Estate have actively participated in the preparation of Local Plans for both North Hertfordshire and Luton for a number of years. Consistently, the development proposals for a strategic urban extension to the east of Luton have been favourably considered in assessments of how best to accommodate the future development needs of Luton, for which it is accepted that these cannot be met entirely within Luton's own administrative boundary.
- 1.1.6 For development to be considered sustainable, it should, where possible, be met close to where the need arises. Land to the east of Luton has been identified within the evidence base as falling within the Luton Housing Market Area (HMA) and therefore, it is right that Sites EL1, EL2 and EL3 should be allocated for development to help meet Luton's needs.
- 1.1.7 Our comments in response to the questions posed by the Inspector are thus set within this context.

2.0 Responses to Inspector's Questions

2.1 Issue 3.1

- 2.1.1 The extent of the Luton Housing Market Area (HMA) within North Hertfordshire, shown in Figure 38 of HOU2, is consistent with previous studies dating back to 2008.
- 2.1.2 Figure 5 of HOU2 shows the boundary included in the London Commuter Belt (LCB) East SHMA and West SHMA (ORS & Savills; 2008) and this is also repeated in Figure 2 of the North Hertfordshire SHMA Part 1 (ORS; 2013)¹.
- 2.1.3 It is also consistent with the Luton HMA boundary used in the preparation of the Luton Local Plan, as shown in the 2010 Luton and Central Bedfordshire SHMA (HOU 003) and subsequent refresh documents in 2014 (HOU 003b) and 2015 (HOU 003c)².
- 2.1.4 The Luton Local Plan has recently been examined and recommended for adoption by the Luton Local Plan Inspector. It is expected that the Luton Local Plan will be adopted by Luton Borough Council at their Full Council Meeting on 7th November 2017.
- 2.1.5 The HMAs for the sub-region were independently assessed by NLP (now Lichfields) as part of a previous application (ref: 13/02000/1) by Bloor Homes for up to 1,050 new homes at Site EL1. The 2013 NLP report titled 'Luton, North Hertfordshire and Central Bedfordshire Sub-Region Housing Assessment' was included as Appendix D to the accompanying Planning Statement. The report agreed that based on commuter patterns, the Hoo Ward at the western edge of North Hertfordshire had a closer relationship with Luton than with the remainder of North Hertfordshire.
- 2.1.6 As the boundary of the Luton HMA within North Hertfordshire has been consistently defined for many years and has been independently assessed by both our own consultants and the Luton Local Plan Inspector, we consider the boundary for the Luton HMA contained in HOU2 to be a robust evidential basis.

2.2 Issue 3.4

- 2.2.1 The Local Plan proposes to allocate three sites to the east of Luton (EL1, EL2 and EL3) for the delivery of 1,950 dwellings to meet an appropriate proportion of Luton's unmet housing need.
- 2.2.2 Bloor Homes has submitted a planning application (ref: 17/00830/1) covering the majority of Sites EL1 and EL2 for up to 1,400 new homes, as well as a local centre, primary school and all-through school.

¹https://northherts-cms.cms-dev.firmstep.com/sites/northherts-cms/files/files/north_hertfordshire_strategic_housing_market_assessment_part_1_1.pdf

²<https://www.luton.gov.uk/Environment/Planning/Regional%20and%20local%20planning/evidence-base/Pages/default.aspx>

- 2.2.3 In addition, The Crown Estate has submitted a planning application (ref: 16/02014/1) for up to 660 new homes.
- 2.2.4 Both of these applications are available to view on the Council's website via the following link: <http://pa.north-herts.gov.uk/online-applications/>.
- 2.2.5 The target of 1,950 dwellings is a net figure and assuming that the proposed sites are allocated to help meet Luton's unmet housing need, this level of development can be delivered within Sites EL1, EL2 and EL3.