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# North Hertfordshire Local Plan

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Local Plan Examination  
Hearing Statement – Week 1  
Matters 1, 2, 3 4 & 6

On behalf of  
The Crown Estate & Bloor Homes South Midlands



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## 1. Introduction

- 1.1. This Hearing Statement has been prepared by Savills (UK) Limited on behalf of the Crown Estate and Bloor Homes South Midlands ('Bloor Homes').
- 1.2. The Crown Estate is an independent commercial business, established by an Act of Parliament. 100% of its annual profits are returned to the Treasury for the benefit of public finances. It is a successful, commercial enterprise, established as a market leader in its key sectors and known for a progressive, sustainable approach that creates long term value, beyond its financial return.
- 1.3. The Crown Estate controls a large portion of land to the east of Luton, including that which forms proposed allocation EL3. An outline planning application for 660 homes has been submitted to North Hertfordshire District Council (ref: 16/02014/1).
- 1.4. Bloor Homes have a controlling interest in a substantial area of land to the east of Luton, including the vast majority of proposed allocations EL2 and EL3. An outline planning application for up to 1,400 new homes has been submitted to North Hertfordshire District Council (ref: 17/00830/1).
- 1.5. The Crown Estate and Bloor Homes have actively participated in the preparation of the Local Plan for North Hertfordshire 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 cannot be met within Luton's own administrative boundary.
- 1.6. Savills will attend the Hearing sessions on these Matters to expand on the representations made to the Regulation 19 consultation and the content of this Statement.
- 1.7. White Peak Planning will attend the Hearing sessions on these Matters to expand on the representations made to the Regulation 19 consultation and the content of their Statements.
- 1.8. Savills and White Peak Planning will submit a Statement on Matter 10 in respect of Luton (Cockernhoe) in due course.

## 2. Matter 1 – Legal Requirements

### **Duty to cooperate**

#### Issues 1.1 to 1.5

- 2.1. With regard to this matter, Savills will reference the representations submitted to the Regulation 19 consultation. In addition, Savills make the following comments.
- 2.2. One of the main matters to be addressed by any Local Plan is the need to ensure that the Objectively Assessed Needs (OAN) for market and affordable housing for the Housing Market Area (HMA) are met (NPPF, paragraph 47).
- 2.3. Luton Borough is incapable of meeting all of the need identified for the Luton HMA, or even that part of the need that the Strategic Housing Market Assessment (SHMA) identified should be provided within its administrative boundaries.
- 2.4. As such, North Hertfordshire District Council has sought to identify sites within its administrative area that can contribute additional housing supply to meet the unmet need. This has led to the proposed allocations to the east of Luton – EL1 to EL3.
- 2.5. In this regard, The Crown Estate and Bloor Homes consider that the District Council has prepared the Local Plan in accordance with the 'duty to cooperate'.



### 3. Matter 2 – Sustainable Development: The Settlement Hierarchy (Policy SP2)

#### Issues 2.1 to 2.2

- 3.1. With regard to this matter, Savills will reference the representations submitted to the Regulation 19 consultation. In addition, Savills make the following comments.
- 3.2. The Crown Estate and Bloor Homes support the proposed Policy, including the inclusion of Luton as one of the towns where the majority of development will be located.
- 3.3. Despite its location outside the District, Luton plays a significant role in servicing the District and it is important that the Plan recognises this.
- 3.4. The Crown Estate and Bloor Homes also support identification of Cockernhoe as a Category A village. The village has a primary school and its close proximity to Luton ensures that the village is sustainable. The development of the proposed allocations to the east of Luton (EL1 to EL3) will further enhance the sustainability of the settlement.

### 4. Matter 3 – The Housing Strategy: The Objectively Assessed Need for Housing and the Housing Requirement (Policy SP8)

#### **The objectively assessed need for housing/The housing requirement set out in Policy SP8**

##### Issue 3.1 to 3.4

- 4.1. With regard to this matter, Savills will reference the representations submitted to the Regulation 19 consultation. In addition, Savills make the following comments.
- 4.2. The extent of the Luton Housing Market Area (HMA) within North Hertfordshire, shown in Figure 38 of HOU 002, is consistent with previous studies dating back to 2008.
- 4.3. Figure 5 of HOU 002 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).
- 4.4. 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).
- 4.5. 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.
- 4.6. The HMA's for the sub-region were independently assessed by NLP as part of application 13/02000/1 and a 2013 report titled 'Luton, North Hertfordshire and Central Bedfordshire Sub-Region Housing Assessment' included as Appendix D to the accompanying Planning Statement. The NLP 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.
- 4.7. As the boundary of the Luton HMA within North Hertfordshire has been consistently defined for many years and has been independently assessed by the Luton Local Plan Inspector, we consider the boundary for the Luton HMA contained in HOU2 to be a robust evidential basis.
- 4.8. The Crown Estate and Bloor Homes control the vast majority of land required to deliver the proposed allocations EL1 to EL3. Planning applications have been submitted by both parties (references 16/02014/1 and 17/00830/1).



- 4.9. The applications have been submitted in tandem with the Local Plan to ensure consistency between the Local Plan process and the application, and to demonstrate that the proposed allocations are deliverable and supported by a robust and credible evidence base. No technical constraints have been identified in over ten years of work that might prevent delivery.



### 5. Matter 4 – The housing strategy: the supply of land for housing (Policy SP8)

- 5.1. With regard to this matter, Savills will rely on the representations submitted to the Regulation 19 consultation.

## 6. Matter 6 – Deliverability (the housing trajectory, infrastructure and viability)

### Issues 6.1 to 6.2

- 6.1. With regard to this matter, Savills will reference the representations submitted to the Regulation 19 consultation. In addition, Savills make the following comments.
- 6.2. Policy SP8 notes that 7,770 homes will be delivered from six strategic housing sites. This includes 2,100 homes on sites EL1 to EL3 to the east of Luton.
- 6.3. The Crown Estate and Bloor Homes control the vast majority of land required to deliver the proposed allocations EL1 to EL3. Planning applications have been submitted by both parties (references 16/02014/1 and 17/00830/1).
- 6.4. The applications have been submitted in tandem with the Local Plan to ensure consistency between the Local Plan process and the application, and to demonstrate that the proposed allocations are deliverable and supported by a robust and credible evidence base. No technical constraints have been identified in over ten years of work that might prevent delivery.
- 6.5. Such a strategy also allows for an accelerated planning programme, which should in turn allow development to commence as soon as possible following the adoption of the Plan and approval of the applications.
- 6.6. It is anticipated that there will be multiple sales outlets on both sites, and thus the potential to deliver a significant number of dwellings each year.

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