
North Hertfordshire Local Plan

Local Plan Examination
Hearing Statement
Matter 22 – The Supply of Land for Housing

On behalf of
The Crown Estate



Contents

1.	Introduction	1
2.	Matter 22 – The Supply of Housing Land	2

1. Introduction

- 1.1. This Hearing Statement has been prepared by Savills (UK) Limited on behalf of the Crown Estate.
- 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 on EL3 has been submitted to North Hertfordshire District Council (ref: 16/02014/1) by the Crown Estate.
- 1.4. The vast majority of proposed allocations EL1 and EL2, adjacent to EL3, is controlled by Bloor Homes. An outline planning application for up to 1,400 new homes on EL1 and EL2 has been submitted by Bloor Homes to the District Council (ref: 17/00830/1) by Bloor Homes. A separate Hearing Statement relating to Matter 22 is being on behalf of Bloor Homes.
- 1.5. The documents for both applications can be viewed on the Council's website via the following link: <https://pa2.north-herts.gov.uk/online-applications/>
- 1.6. 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.
- 1.7. Savills intends to attend the Hearing sessions on Matter 22 to expand on the representations made to the Regulation 19 consultation, submissions made previously to other Matters, and the content of this Statement.
- 1.8. White Peak Planning act on behalf of Bloor Homes in respect of proposed allocations EL1 and EL2 and also intend to attend the Hearing sessions on Matter 22 to expand on the representations made to the Regulation 19 consultation, submissions made previously to other Matters, and the content of their Statements.

2. Matter 22 – The Supply of Housing Land

2.1 This Statement comments on Matters 22.1 a) to d) together.

Issue 22.1 a) Is reducing the overall housing requirement to 13,000 and undertaking an early review of the Local Plan, the most appropriate way forward? If not, why not?

Issue 22.1 b) If the housing requirement should be modified to 13,000 dwellings, should the supply of housing sites proposed in the Local Plan also be reduced? If so, how?

Issue 22.1 c) Is a 'buffer' of around 13% an appropriate approach? If not, why not?

Issue 22.1 d) If there is a 'buffer' of around 13%, do the exceptional circumstances required for the 'release' of land from the Green Belt for housing development exist?

2.2 For the reasons set out in our September 2020 Hearing Statement on Matter 21, Savills contends that the overall housing requirement is higher than 13,000. The anticipated delivery of 14,650 therefore potentially equates to less than a 13% 'buffer' to provide choice and flexibility.

2.3 Moreover, the Local Plan needs to make provision for land for both the Stevenage and Luton HMAs. When looking at the 'buffer' it is important to look separately at the 'buffer' for the Stevenage and Luton HMAs, as the Council has done at Paragraph 21 of ED191B. The table in that paragraph states that the 'buffer' for Stevenage HMA is 14% and the 'buffer' for the Luton HMA is 0%.

2.4 Exceptional circumstances exist for the release of the East of Luton sites from the Green Belt for the reasons set out previously, including by the Council in paragraph 12 of ED173 and in Savills Matter 24 Hearing Statement (February 2020). Moreover, there is no 'buffer' for the Luton HMA and these sites would meet that need within the Luton HMA and as close to where they are needed as possible. We support White Peak Planning's detailed comments in their Matter 22 Hearing Statement (September 2020) that the East of Luton sites are essential to deliver the required housing mix in that portion of NHDC's housing requirement that meets Luton's unmet needs: both in terms of size of units and affordability of units. We also support the conclusions and rationale set out in White Peak Planning's Matter 22 Hearing Statement (September 2020) that 1,700 rather than 1,485 dwellings is a realistic trajectory for the East of Luton sites within the Plan period.

2.5 **In conclusion, it is contended that:**

- **Issue 22.1 a) – Reducing the overall housing requirement to 13,000 is not an appropriate way forward whether or not this is coupled with the requirement for an early review of the Local Plan;**
- **Issue 22.1 b) – The anticipated supply of housing (14,650), which equates to an overall 'buffer' of less than 13% and is required to meet the overall housing requirement and the supply of housing sites proposed in the Local Plan, should not be reduced;**
- **Issue 22.1 c) – There is no 'buffer' for the Luton HMA;**



- Issue 22.1 d) – The ‘buffer’ should be looked at separately for the Stevenage and Luton HMAs. The ‘buffer’ is 0% for the Luton HMA and the exceptional circumstances required for the ‘release’ of land to the East of Luton from the Green Belt for housing development to meet Luton’s unmet need exist. Buffers of far greater magnitude have been held in any event lawful to ensure flexibility. Such larger buffers were not held by the court to undermine the exceptional circumstances case for green belt release (see Compton Parish Council v Guildford Borough Council [2019] EWHC 3242 (Admin))

