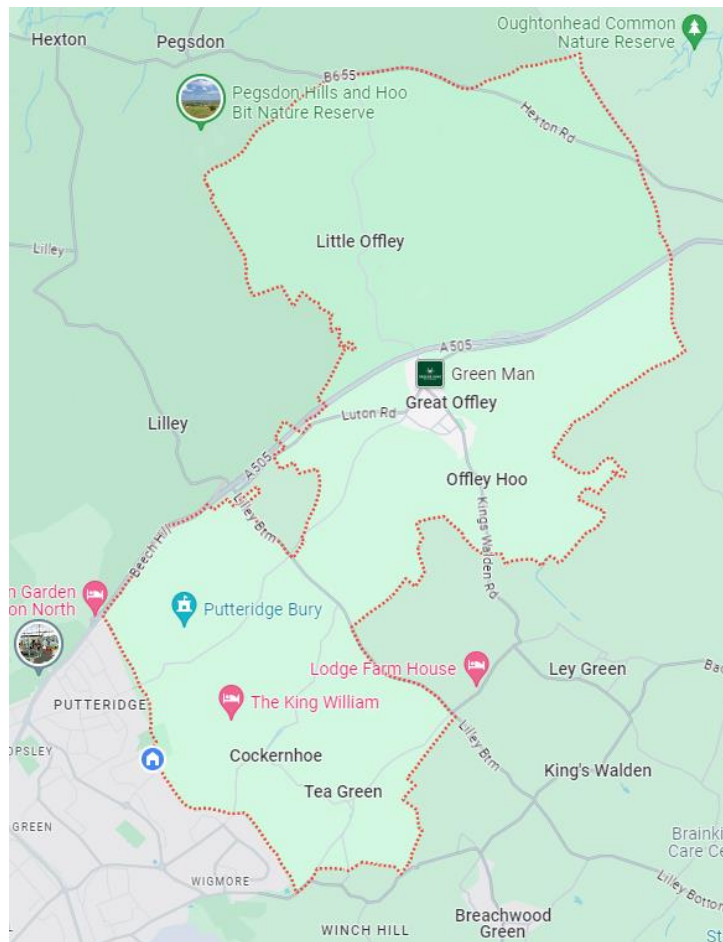


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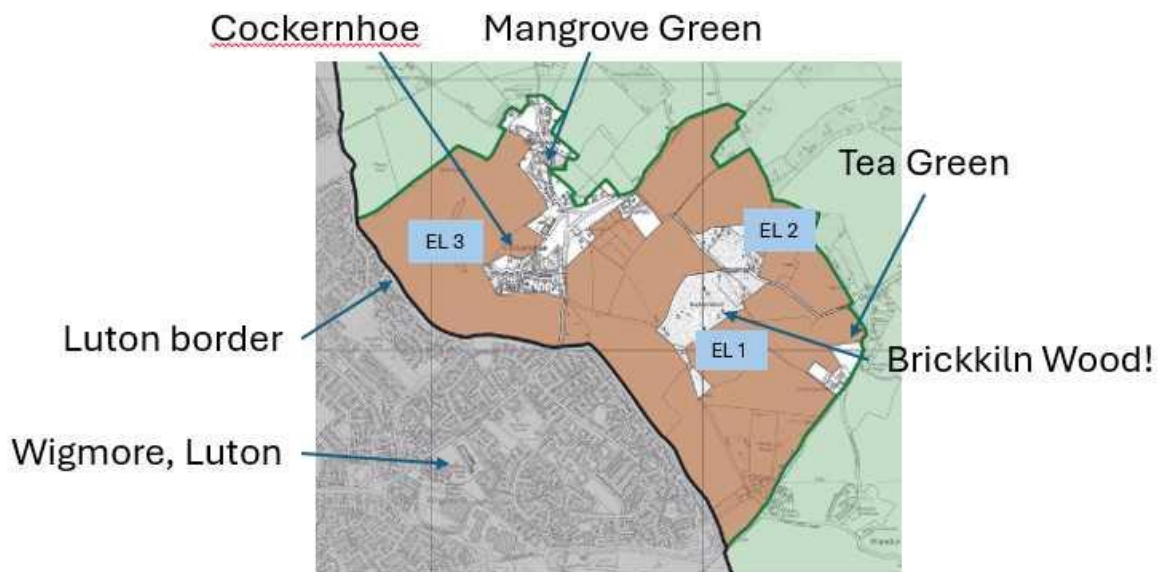
**EAST OF LUTON
(EOL)
PROPOSED HOUSING
DEVELOPMENT**

FACT SHEET

1 Offley Parish Council



2 Area affected by proposed EOL housing development



Proposed housing development sites: EL1, EL 2 & EL 3
- all coloured brown
The white areas are the three existing hamlets
- Brickkiln Wood is also in white!

3 Messrs Gove/Sunak statements in support of Green Belt protection

Michael Gove confirmed on February 13, 2024, in a visit to Walsall, that no council will be 'compelled' to build on Green Belt land to meet housing targets. The government was aiming to make it quicker and easier for brownfield sites to be redeveloped for housing, and Mr Gove said that while there was a need for more homes to help tackle the housing crisis, Green Belt protection was also important.

On Tuesday, 19 December 2023, in a speech to the Royal British Institute of Architects in London, Michael Gove said: 'Local authorities do not have to earmark greenfield land for new homes.' He added that local authorities will be able to reject development if it would significantly alter the character of an area or have an impact upon the greenbelt. He also said that local authorities are comfortable knowing that they need not redraw the greenbelt or sacrifice protected landscapes to meet housing numbers." Further added: "There are perfectly reasonable reasons to resist development if it is unattractive, **if it's unaccompanied by infrastructure, if it dramatically changes the character of an area, if it harms the environment**". "It's only right that local people can have the chance through the planning system to safeguard the environmental and protect the character of the places in which they live."

From Michael Gove's statement to Parliament in December 2019: 'In summary, the new NPPF will 'clarify a local lock on any changes to Green Belt boundaries and safeguard local plans from densities that would be wholly out of character.'

'This Government is committed to protecting the Green Belt. Planning policy already includes strong protections to safeguard the Green Belt for future generations. The Green Belt is vital for preventing urban sprawl and encroachment on valued countryside. That is why the Government is ensuring it is clear there is generally no requirement for local authorities to review or alter Green Belt boundaries if this would be the only way to meet housing needs. Where a relevant local planning authority chooses to conduct a review, The existing national policy will continue to expect that Green Belt boundaries are only altered where exceptional circumstances are fully evidenced and justified, and this should only be through the preparation or updating of plans'.

Rishi Sunak

18 May 2023 article in The Guardian : ‘The Prime Minister restated his insistence that councils should not have to consider the green belt for development and emphasised he was moving away from housing targets despite the crisis in affordable housing making it difficult for younger people to rent and buy.

Speaking on the plane during a trip to Japan, Sunak said: “On the green belt, I was very clear over the summer what I was going to do, which was move away from a system of nationally imposed top-down housing targets on local areas. I don’t think that is the right approach.

“In government as Prime Minister, that is what I have delivered relatively shortly after taking office. I was very clear over the summer I wanted to ensure our green spaces are protected. I think that is what local communities want.”

Feb 13 , 2024 article in The Times by Rishi Sunak:

‘But we know there is much more to do. To solve [the housing challenge](#), we must ask not just “how many”, but “where”. **We need to build homes in the places where people need and want them.** There’s little point trying to force large new estates on our countryside and green belt when that is where public resistance to development is strongest and where the GP surgeries, schools and roads don’t exist to support new communities. I also believe deeply in the need for careful stewardship of our beautiful natural landscapes. And we must give local communities a say. We won’t solve the housing challenge if we simply ignore people’s concerns or bulldoze through local opposition. All that would build is resentment’

29 July 2022 article in The Planner

Rishi Sunak stated: ‘Over the last few years we’ve seen too many examples of local councils circumventing the views of residents by taking land out of the green belt for development, but I will put a stop to it. “Under my plans, if a local community has clearly judged a development to be inappropriate there are no circumstances in which planning permission should be granted.”

4 Back-up data on Luton's revised housing capacity of 10,903.

Look at ED224 – SOCG between LBC, NHC, Bloor Homes and The Crown Estate. This gives the 10,903 figure (but also includes the extra 2,308 as footnote 3 which was ignored by the Inspector as it didn't come from the 'responsible authority' (namely formally from LBC) – even though the SOCG was signed by Cllr Paul Castleman of LBC the Cllr responsible for Planning.

Back-up data on Luton's revised OAN of 16,700 (down from 17,800)

Extract paragraphs from the Inspector's Final Report

NB: Context here: During the NHC Local Plan examination, the Office for National Statistics issued new household projections for England and Wales, which dropped from the previous figures. As a result, the Inspector required NHC to analyse what these lower household projections would mean for housing needs across North Herts and in Luton (because of the planned 1,950 homes earmarked by NHC for Luton's unmet needs at EOL). Both these sets of work were done by statisticians Opinion Research Services, and in the case of Luton, they concluded that the Objectively Assessed Housing Need (OAN) for Luton should be reduced from 17,800 to 16,700.

The Inspector's Report stated:

Helping to meet the need for housing in Luton:

72. As part of the Plan's housing requirement, Policy SP8 commits to providing 1,950 new homes in the part of North Hertfordshire that lies within the Luton HMA to assist with meeting Luton's housing needs. As MM035/FM057 clarifies, around 1,400 of these are expected to be delivered in the Plan period. All the part of the Luton HMA within North Hertfordshire is within the Green Belt.

73. The Luton Local Plan (2011-2031) was adopted in November 2017. **Policy LLP2 identifies the housing need in the borough as 17,800 over the plan period.** It makes provision for the delivery of 8,500 homes and recognises an unmet need for 9,300 net additional dwellings. This conclusion was not arrived at lightly – it was justified by Luton Borough Council and subject to scrutiny by an Inspector during an examination where it is clear from the Inspector's report [ED3] that it was key issue. The policy also sets out Luton Borough Council's commitment to work with neighbouring local authorities to help ensure delivery of the borough's unmet needs

under the Duty to Co-operate. It says that this work is to be informed by the Luton HMA Growth Options Study (November 2016) [HOU7] ('the growth Options Study').

74. Both North Hertfordshire District and Central Bedfordshire Councils are committed to assisting Luton Borough Council in meeting its housing needs. This has been unambiguously agreed upon under the Duty to Co-operate. I note the opposition of many in this examination to the Council's offer of assistance. But that is a matter for the Council, provided the approach is adequately justified and, therefore, sound.

75. However, bearing in mind the guidance in the PPG that I have previously mentioned, it is **necessary to consider whether there has been a meaningful change in the housing situation in Luton**. This is relevant because if there were to have been a material reduction in the level of unmet need identified in the Luton Local Plan – either because the need itself had reduced or the supply had increased – then this could: a) undermine the justification for the element of the Plan's requirement that is intended to assist meeting Luton's needs, and b) affect the existence or otherwise of the exceptional circumstances necessary to 'release' Green Belt land for housing that is intended to address the unmet need.

76. I should say here that it is not for me to determine or reach conclusions about the precise level of housing need or supply in Luton. It is the role of Luton's development plan to set the OAN for the borough and set out the supply anticipated to meet it, and that is not the local plan I am examining. My considerations are limited to a broad 'sense check' of the housing situation regarding need/unmet need and supply for the reason set out in the preceding paragraph. The following paragraphs should be read in that context.

77. On the question of need, the Council has worked jointly with Luton Borough and Central Bedfordshire Councils to assess the implications of the 2018 projections on housing need in Luton – in effect, to consider what Luton's housing need figure might be if calculated based on projections that are more recent than those on which the Luton Local Plan is founded. In short, this concludes that a figure of 16,700 would be the most robust at the level of analysis undertaken. That would equate to an unmet need of 8,200 homes, based on the supply anticipated within the Luton Local Plan. Clearly, this is lower than the 9,300 set out in the Luton Local Plan.

78. This exercise has not used the 'standard method' for calculating need that is set out in current national policy and would be used to establish need if Luton Borough Council were to submit a local plan for examination now. However, as I see it, the methodology used allows for a more direct comparison with the established OAN for Luton. As that is the purpose of the task, I consider the approach used to be appropriate and reasonable.

79. Regarding housing delivery in Luton, the agreed position of North Hertfordshire and Luton Borough Councils is set out in a Statement of Common Ground (December 2020) [ED224]. This points to figures in Luton's Strategic Housing Land Availability Assessment (November 2019) [ED189], being the most recent published by Luton Borough Council. It identifies 4,325 net dwelling completions in Luton between 1 April 2011 and 31 March 2019 and anticipates a further 6,578 new homes up to 2031. This amounts to a total of 10,903, which is clearly more than the 8,500 provided for in the Luton Local Plan.

80. I have been provided with volumes of detailed evidence from interested parties about housing delivery and planning permissions granted in Luton. I have taken account of all of this. However, Luton Borough Council is the authority charged with monitoring housebuilding in the borough and collating and analysing relevant associated data. As it is the responsible public authority concerned, I have based my considerations on the figures it has supplied through the Statement of Common Ground.

5 Correspondence with Bim Afolami, MP for the Hitchin & Harpenden Constituency

Correspondence with Bim Afolami MP regarding 'calling in' the Local Plan. The letter from Roy Parker and David Dorman was dated 10 October 2022, ahead of the Local Plan adoption vote on 8 November. No reply was received from Bim Afolami.

Dear Bim,

We understand you are unsure about "calling-in" NHDC's Local Plan concerning, inter alia, the East of Luton ("EOL") development of 2,100 homes on valuable Green Belt land.

However, we are confident that if you are convinced that there is a clear case of failure by the Inspector to assess the facts correctly **then** you would agree to join your two local MPs, Stephen McPartland and Sir Oliver Heald, in "calling-in" NHDC's Local Plan on behalf of your constituents.

We concentrate our contention in this request on EOL but there is also potentially a sound case on other significant developments on Green Belt land within NHDC.

You will know that:

Around 1,000 people objected to the inclusion of EOL in NHDC's submission plan and were ignored.

More recently, around 1,000 people objected to EOL being included taking into account the evidence presented.

You may also recall that NHDC originally missed recording 100 of these people's objections in their initial August 2021 summary (ED232) which, after our intervention, was corrected in November 2021 (ED233A).

We wish to present you with the key factors in this case.

The stated basis for inclusion of EOL in the Local Plan ("LP") is that in Luton Borough Council ("LBC")'s LP it calculated its Objectively Assessed housing Needs ("OAN") for the LP period 2011-2031 as 17,800 **in 2015** using independent consultants Opinion Research Services ("ORS"). Furthermore, LBC calculated its housing capacity for 2011-2031 as 8,500 at **31 March 2016** in its Strategic Housing Availability Assessment ("SHLAA"). These factors change over time but when **the Inspector made his final Report they were 6 ½ years old.**

We specifically draw your attention to the following paragraphs of the Inspector's final Report in which he set out the principles that he was obliged to apply. We have marked key factors in **bold**.

These principles come mainly from the National Planning Policy Framework ("NPPF") and the Planning Practice Guidance ("PPG"):

Paragraphs from the Inspector's Report:

40. The PPG says that: "Wherever possible, local needs assessments **should be informed by the latest available information**. The [NPPF] is clear that **local plans should be kept up to date**. **A meaningful change in the housing situation should be considered** in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued."

53. The Council ("NHDC") says that the **2018-based OAN figure represents a meaningful change in the housing situation** when considered against the OAN of 13,800 upon which the Plan as

originally submitted was founded. I agree. It is a reduction of 2,300 dwellings, amounting to a change of around 17%. As I see it, this is significant, and I regard it to be meaningful in the context of the figures involved. Consequently, the original OAN figure of 13,800 is not justified, and I consider the OAN for North Hertfordshire to be 11,500 homes for the period 2011 to 2031. **[NB: Incidentally there is then an accepted adjustment for elderly persons staying in their homes longer. The adjustment originally was 200 homes increasing NHDC's original housing need to 14,000 and this was reduced to 100 homes then producing NHDC's revised housing need to 11,600].**

66. The NPPF does not rule out the 'release' of Green Belt land for housing through the plan making process. Paragraph 83 says that "... Green Belt boundaries **should only be altered in exceptional circumstances, through the preparation or review of the local plan**". Whilst this is a high bar, it is not an absolute preclusion. Given my conclusion later in this report that such exceptional circumstances do exist, there is nothing in national planning policy to indicate that the housing allocations proposed in the Plan should be prevented or reduced on Green Belt grounds.

Helping to meet the need for housing in Luton

72. As part of the Plan's housing requirement, Policy SP8 commits to providing 1,950 new homes in the part of North Hertfordshire that lies within the Luton HMA to assist with meeting the housing needs of Luton. Of these, as MM035/FM057 clarifies, **around 1,400 are now expected to be delivered in the Plan period**. All the part of the Luton HMA that is within North Hertfordshire is within the Green Belt.

73. The Luton Local Plan (2011-2031) was adopted in November 2017. Policy LLP2 identifies the housing need in the borough as 17,800 over the plan period. It makes provision for the delivery of 8,500 homes and recognises that there is an unmet need of 9,300 net additional dwellings. This conclusion was not arrived at lightly – it was justified by Luton Borough Council and subject to scrutiny by an Inspector during an examination where it is clear from the Inspector's report [ED3] that it was **a key issue**. The policy also sets out Luton Borough Council's commitment to work with neighbouring local authorities to help ensure delivery of the borough's unmet needs under the Duty to Co-operate. **It says that this work is to be informed by the Luton HMA Growth Options Study (November 2016) [HOU7] ("the Growth Options Study")**.

75. However, bearing in mind the guidance in the PPG that I have previously mentioned, it is necessary **to consider whether there has been a meaningful change in the housing situation in Luton**. This is relevant because **if there were to have been a material reduction in the level of unmet need identified in the Luton Local Plan – either because the need itself had reduced or the supply had increased – then this could:**

- a) **undermine the justification for the element of the Plan's requirement that is intended to assist meeting Luton's needs; and**
- b) **affect the existence or otherwise of the exceptional circumstances necessary to 'release' Green Belt land for housing that is intended to address the unmet need.**

77. On the question of need, the Council has worked jointly with Luton Borough and Central Bedfordshire Councils to assess the implications of the 2018 projections on housing need in Luton – in effect, to consider what Luton's housing need figure might be if calculated on the basis of projections that are more recent than those on which the Luton Local Plan is founded. In short, **this concludes that a figure of 16,700 would be the most robust** at the level of analysis undertaken. That would equate to an unmet need of 8,200 homes, based on the supply anticipated within the Luton Local Plan. Clearly, this is lower than the 9,300 set out in the Luton Local Plan.

79. Regarding housing delivery in Luton, **the agreed position of North Hertfordshire and Luton Borough Councils is set out in a Statement of Common Ground (December 2020) [ED224]**. This points to figures in Luton's Strategic Housing Land Availability Assessment (November 2019) [ED189], being the most recent published by Luton Borough Council. It identifies 4,325 net dwelling completions in Luton between 1 April 2011 and 31 March 2019 and anticipates a further 6,578 new homes up to 2031. This amounts to a total of 10,903, which is clearly more than the 8,500 provided for in the Luton Local Plan.

80. I have been provided with volumes of detailed evidence from interested parties about housing delivery and planning permissions granted in Luton. I have taken account of all of this. However, Luton Borough Council is the authority charged with monitoring housebuilding in the borough and collating and analysing relevant associated data. As it is the responsible public authority concerned, I have based my considerations on the figures it has supplied through the Statement of Common Ground.

94. Including sites with planning permission in the supply is consistent with footnote 11 of the NPPF. It is also consistent with national policy to include 'broad locations' for years six to ten, in principle.

Our evaluation

We set out the above paragraphs in the Inspector's Final Report to demonstrate what the Inspector has stated as key issues necessary for him to reach his conclusion. In our opinion, he has demonstrably **failed to do so**.

We also set out below an extract, Para.25 (d) from the Inspector's letter of 9 July 2019 to NHDC (ED 166), where he stated he had reservations about the justification for the allocation of the EOL sites to help meet LBC's unmet housing needs, as follows:

25. I ask the Council to consider carefully my misgivings. To assist, I would suggest that there are several possible ways forward:

d) put forward a main modification deleting the East of Luton sites from the Local Plan. If this path is pursued, it is highly likely that, to be sound, the Local Plan should include a commitment to further joint working with the other local authorities in the Luton HMA to identify the most appropriate sites for meeting Luton's unmet housing need and to bring forward a development plan document allocating any sites in North Hertfordshire identified through this analysis.

We have repeatedly suggested to the Inspector that this should be the way forward with some adjustments (see ED240). This would require LBC to produce an up-to-date assessment of their OAN and housing capacity as required by their adopted policy LLP40, due mid-2021, which they have failed to do. LBC's Inspector in his Final Report on its Local Plan required policy LLP40 to be updated on 13 separate occasions, demonstrating its importance.

It is clear beyond doubt that NHDC's Inspector was required to consider the latest available information on LBC's housing needs to justify whether there has been a meaningful change in its housing situation. In para.94 above, he points out that including sites with planning permission in the supply is consistent with the NPPF. That is exactly what we have done for LBC, **and he has failed to accept this contrary to NPPF rules.**

Clearly, LBC has failed to comply with policy LLP40 of its Local Plan, which would give up-to-date figures on its unmet needs.

The Inspector has chosen to rely on the Statement of Common Ground ("SOCG") from NHDC, LBC, Bloor Homes and The Crown Estates of December 2020 (ED 224) as being the most recently published figures of LBC's housing capacity. The parties to this agreement signed this SOCG, which contained further statements on housing capacity to those quoted by the Inspector. We refer you to clause 15 of ED224, stating that Bloor Homes has identified further permissions granted from April 2019 to August 2020. This review was made following our colleague Carolyn Cottier's written statement of 21 February 2020 to the Inspector's hearing sessions, pointing out the significant increase in LBC's planning grants and, thus, housing capacity. Bloor Homes engaged White Peak Planning consultants to produce this evidence for the Inspector's further hearing sessions. They identified an additional 2,308 homes to the 10,903 stated by the Inspector in his para.79 above, bringing the total accepted by the parties to that SOCG, including both NHDC and LBC, to 13,211, some 55% above LBC's 8,500 in its Local Plan. In White Peak Planning's report, it stated that this

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increase (55%) was **not a meaningful increase to** LBC's housing capacity. **That is incorrect to say the least (rubbish comes to mind!) and we request that this must be challenged.**

In March 2021 we wrote to LBC asking it when it expected to produce the information required in policy LLP40. LBC committed to starting this review before the end of 2019 and having it ready for public examination by mid-2021. LBC stated it was at an early stage with this work and couldn't say when it would be ready. This **failure by LBC justifies our investigation of LBC's additional planning grants** stated in LBC's Development Control Committee's minutes up to 28 February 2022. We arrived at a figure of 15,038 and compared this with LBC's revised OAN of 16,700, as accepted by the Inspector in Para.77 above. LBC's unmet needs would be only 1,662 (16,700 – 15,038). **In addition, the following information was not available to the Inspector. Still, it shows that additional sites continue to come on stream. In the 6 months to 31 August 2022, another 465 additional dwellings were approved by LBC's development control committee, with others known to be in the pipeline.**

The Inspector stated in para. 80 above that he **"has been provided with volumes of detailed evidence from interested parties about housing delivery and planning permissions granted in Luton. I have taken account of all of this"**. The figures that we have produced amount to 15,038 dwellings, now 77% above 8,500, and have been fully detailed. **He cannot claim that a 77% increase is not a meaningful change in LBC's housing situation, especially when he states regarding NHDC's Local Plan in his para 53 above that a reduction of 2,300 dwellings – amounting to a change of around 17% - is regarded by him as significant.**

The comment "interested parties" referring to us should not be considered detrimental when **trying to save valuable Green Belt land and prevent the ruin of three of your constituency villages. We would suggest that he should consider certain parties to their December 2020 SOCG as more "interested parties" putting financial gain as a priority. We contend that he has not taken account of this, at all.** As per his para.40 above **"local needs assessments should be informed by the latest available information"**. The very least he should have done is follow his suggestion 25(d) of his letter of 9 July 2019 stated above following his previous misgivings.

It is also relevant here that the Inspector's failure to take proper account of the true extent of Luton's house-building programme and the huge contribution from Central Bedfordshire Council to meet LBC's unmet housing needs on 19 identified sites, could represent a challengeable decision on his failure to taking **'material considerations'** into account.

We also draw your attention to para.72 above, where the inspector quotes that Bloor Homes would now deliver only 1,400 homes in the period rather than 1,950. He based this on NHDC's housing trajectory of 1 April 2020. This is so out of date! Bloor Homes has not yet received outline planning permission, and this trajectory predicts that they will deliver homes starting next year. In our view, the most they are likely to deliver in the period is 800. Bloor Homes contends that their commitment to 40% affordable housing for LBC makes a significant difference. When you look into the details provided by White Peak Planning in their September 2020 report, Bloor Homes plans to allocate 53% of the affordable homes to 1 and 2-bed dwellings, which is exactly what they state is not needed by LBC. Thus, of the 320 affordable homes within the period (40% of 800), only 150 would be classed as "family homes". This is insignificant in this context and does not justify a meaningful change to the affordable housing situation.

The Inspector puts a lot of emphasis on the Growth Options Study of 2016 (HOU7) as per para.73 above. We have continually pointed out that this study had major shortcomings and must be regarded as discredited, for instance, our response dated 23 June 2021 to ED173. This study identified 31 sites as possibilities to address LBC's unmet needs. It did **not** include the two sites in Houghton Regis North, which had already received outline planning permission for 7,000 dwellings in 2014 and 2015. This location is already being built and is the biggest contributor to Central Beds Council ("CBC")'s provision of 7,350 dwellings up to 2030/31 to help meet Luton's unmet housing needs.

Yours Sincerely

Roy Parker
Dancote,

EOL FACT SHEET

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Cockernhoe Green
North Herts

David Dorman
Mangrove End Cottage
Mangrove Green
North Herts

6 **5 MINUTE ADDRESS FOR NHC EXTRAORDINARY MEETING TO ADOPT LOCAL PLAN**

BY DAVID DORMAN NOVEMBER 8, 2022

- 1) I am speaking against Policy SP19 of the Local Plan - the allocation of 2,100 dwellings at East of Luton on Green Belt land. Of these, 1,950 are solely for Luton's unmet need.
- 2) Luton's Plan, adopted in November 2017, shows a housing need of 17,800 and a housing capacity of 8,500, giving an unmet need of 9,300 houses. These figures are based on information of 31 March 2016 that is now 6.5 years old.
- 3) The Luton Inspector stated on 13 occasions in his report that Luton had to carry out a review of its Plan starting before the end of 2019 ready for public examination in mid-2021. This has not been done.
- 4) This review was to update Luton's housing need and housing capacity – material considerations for establishing the truth for the supposed need to build houses at East of Luton to help meet Luton's unmet needs and whether the '**exceptional circumstances**' required to build on the Green Belt exist.
- 5) We continue to challenge Luton on its failure to carry out this review and also the Planning Inspectorate over its failure to enforce that review.
- 6) The Luton Inspector also identified Central Bedfordshire Council (CBC) as the 'best fit' to meet Luton's unmet housing needs to the north and north-west of the town. Central Beds has allocated 19 sites for their 7,350 homes identified to meet the bulk of Luton's unmet needs. North Herts is next in line.
- 7) Throughout the examination our Inspector had serious misgivings about Luton's housing needs. He requested a review of Luton's assessed needs and this resulted in a drop of 1,100 to 16,700 from the Local Plan figure of 17,800.
- 8) Luton also produced an updated SHLAA in March 2019 increasing its housing capacity from 8,500 to almost 11,000 through to 2031.
- 9) Let's pause at this point. The Inspector agreed to the smaller Luton housing need of 16,700 and he also agreed to the increased Luton housing capacity of some 11,000. That results in an unmet need of 5,700. Central Beds is providing 7,350 homes from its 19 sites which more than covers all Luton's unmet needs with 1,650 extra as a 29% buffer. So there is no need for East of Luton Green Belt housing.

- 10) Even if the Luton housing need remains at the Local Plan figure of 17,800, the Inspector's accepted Luton housing capacity at around 11,000 results in an unmet need of 6,800. Even then, the Central Beds contribution of 7,350 covers the requirement with 550 to spare. No need for East of Luton.
- 11) The only way that the requirement for the East of Luton works is if Luton's housing need remains at 17,800 and you believe that they will only build 8,500 and no more. That is what this council, Luton and the developers want you to believe. That stretches incredulity to breaking point. It is totally unfeasible. Luton's updated SHLAA shows their build at around 11,000 dwellings, but we also have further compelling evidence.
- 12) White Peak Planning, consultants to Bloor Homes, issued a paper to the Examination in September 2020. This identified **a further** 2,300 planning approvals for Luton up to the end of July 2020, bringing Luton's housing capacity to over 13,200 – a 55% increase on the 8,500. The consultants concluded this was not a meaningful increase.
- 13) In December 2020 North Herts, Luton, Bloor Homes and the Crown Estates submitted a revised SOCG which included the 2019 SHLAA figures totalling around 11,000 and the Inspector concentrated on that figure as the latest from Luton. What he failed to spot is that in clause 15 of that SOCG it also included the extra 2,300 houses identified by White Peak Planning as I have just mentioned. As this SOCG was signed by North Herts and Luton they both had endorsed their knowledge of those extra planning grants that increased Luton's capacity to over 13,200.
- 14) Since then, the detailed work we have done to examine every official meeting of Luton's Development Management Committee, firstly to end February 2022, reveals that by that date Luton's housing capacity on known approvals has reached 15,600 - now 80% above the 8,500. To Luton's credit these are all on brownfield sites. This brings the unmet housing need down to just over 1,000 not the 9,300 in their Plan.
- 15) Our evidence for this was accepted by the Inspector as ED240. These figures cannot be challenged by Luton as they come from their own records.
- 16) All of this clearly demonstrates that whatever realistic scenario is studied **'exceptional circumstances' do not exist** to justify the release of valuable Green Belt land at East of Luton and the effective urbanisation of the three villages. We believe that policy SP19 should only be accepted by Councillors provided Luton completes its overdue review very soon and that this shows the unmet need from Luton exceeds the 7,350 committed by Central Beds by at least 1,950 houses.

7 Letter from Bim Afolami MP to the Rt. Hon Michael Gove MP

