

Examination of the Central Bedfordshire Local Plan

Inspectors: Matthew Birkinshaw BA(Hons) Msc MRTPI and

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and

Examination of the North Hertfordshire Local Plan

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Andrew Davie
Assistant Director – Development and Infrastructure
Central Bedfordshire Council

Nigel Smith
Strategic Planning Manager
North Hertfordshire District Council

By email only

8 July 2020

Dear Mr Davie and Mr Smith,

Office for National Statistics ('ONS') 2018-Based Household Projections

1. We write further to the examinations of the Central Bedfordshire and North Hertfordshire Local Plans. As you will be aware, both Plans are subject to the transitional arrangements set out in paragraph 214 of the National Planning Policy Framework (2019) ('the Framework'). Under the transitional arrangements the policies in the 2012 Framework, and in previous versions of the national Planning Practice Guidance (the 'PPG'), continue to apply.
2. Where assessing housing and economic development needs, the PPG advises that *"Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework 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should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued."* (Paragraph:016, Reference ID: 2a-016-20150227)
3. On Monday 29 June 2020 the ONS published the 2018-based household projections. They represent the latest available information. In response to the data released by the ONS, please can you provide the following information.

4. Firstly, please can you individually, provide an assessment of the objectively assessed need for housing for both Central Bedfordshire and North Hertfordshire based on the most up-to-date household projections. This should include details of how you have arrived at each figure. Secondly, please can you advise whether or not you consider this represents a meaningful change for the purposes of the PPG and provide reasons for your conclusions. If the latest household projections do represent a meaningful change, what are the implications for the housing requirement figures in each Plan?
5. A fundamental part of the strategy in the Central Bedfordshire and North Hertfordshire Local Plans is to remove land from the Green Belt in order to contribute towards meeting the unmet housing needs from Luton. It is for this reason that we have written to you both in this joint letter.
6. In response, please can you also advise what implications the latest household projections have on housing needs in Luton? Specifically, are there any implications from the 2018-based projections on the need to release land from the Green Belt around Luton? Do the exceptional circumstances, as required by paragraphs 79-86 of the 2012 Framework, exist to justify the proposed revisions to Green Belt boundaries?
7. In answering the questions above it would greatly assist both examinations if the Councils could prepare a Statement of Common Ground with Luton Borough Council. This should set out the need for housing which cannot be accommodated in Luton based on the adopted *Luton Local Plan (2011-2031)*, provide comparative figures based on the most up-to-date information set out in the 2018-based projections and set out conclusions on what this means for both examinations going forward.
8. Finally, as part of the Councils response(s), we would also be grateful for any comments that you wish to make on *Aireborough Neighbourhood Development Forum v Leeds City Council [2020] EWHC 45 (Admin)*. In particular, if there has been a meaningful change in the housing situation, what implications, if any, the judgement has for both examinations.
9. So that the examinations are not unduly delayed, please can you provide a response to the above questions by **Friday 31 July 2020**. Should you require more time please let us know as soon as possible. In the meantime, if you have any questions please do not hesitate to contact us through the Programme Officer. Both Councils should upload this letter to the relevant examination websites. However, we are not seeking representations from any participants at this stage and any unsolicited correspondence will be returned.

Yours Sincerely,

Matthew Birkinshaw, Helen Hockenhull and Simon Berkeley

Inspectors