

# Local Authority Monitoring Report 2018/19 – 2021/22

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## B: Additional Information

### i. Acronyms used in this report

AMR:	Authority Monitoring Report
CIL:	Community Infrastructure Levy
DART:	Luton Direct Air-Rail Transit
DLUHC:	Department for Levelling Up, Housing and Communities
HDT:	Housing Delivery Test
HFR:	Housing Flows Reconciliation
HMO:	Houses in Multiple Occupation
IFS:	Infrastructure Funding Statement
LDS:	Local Development Scheme
LLP:	Luton Local Plan
LLPx:	Luton Local Plan policy number
LPG:	London Plan Guidance
NPPF:	National Planning Policy Framework
NPPG:	National Planning Practice Guidance
PBSA:	Purpose-built student accommodation
SHLAA:	Strategic Housing Land Availability Assessment
SHMA:	Strategic Housing Market Assessment
SPD:	Supplementary Planning Document
SRFI:	Strategic Rail Freight Interchange

### ii. Explanatory Notes

#### ii.a Definitions

Word or phrase	Definition within this report
Completion:	For the purposes of this report, a property is deemed 'complete' when it is able to be occupied. In larger developments, completion certificates may be issued in batches, whilst individual properties may themselves be occupied, have postal addresses, and are registered for council tax. The units are therefore part of the housing stock, and are measured as such.

Word or phrase	Definition within this report
Family:	For the purposes of this report, ‘family’ accommodation is defined as accommodation with two or more bedrooms, in line with that used by Housing in the <a href="#">Luton Housing Strategy 2022 to 2027</a> . However, due to a lack of detailed data, it is not possible to differentiate for this report between 2 bedroom, 3 person and 2 bedroom, 4 person accommodation – the latter being Housing’s definition.
Floorspace:	Total floor area within a building, including that on above-ground floors.
Mixed employment use	Development with permitted uses falling within two or more former B1, B2 and B8 classes, now mixed Eg (i-iii), B2 and B8 classes.

ii.b Other information

All amounts are ‘net’ figures unless otherwise stated

Maps – maps used show Wards as at 1 April 2022; these have since been reviewed and changed, but will be referred to with their old names/boundaries throughout this report.

Use Classes - all references to use classes in this report state both pre- and post-2020 classes, with the latter in brackets.

All images are © Luton Council unless otherwise stated

# 1. Introduction

This authority monitoring report (AMR) describes development activity, which relates to planning within Luton, covering the period from 1 April 2018 to 31 March 2022.

While the focus of this report is between 2018/19 and 2021/22, some tables have also been included that summarise trends and total change since 1 April 2011, which is the start date of the 2017-adopted Luton Local Plan 2011-2031.

The period of this report has seen a number of proposed and actual changes to the planning system, which are shown in Appendix One. Where applicable (for example new use classes), these changes are reflected in the commentary.

## 1.1 Purpose of this report

National planning practice guidance explains the [role of AMRs](#):

“Local planning authorities must publish information at least annually that shows progress with local plan preparation, reports any activity relating to the duty to cooperate, any information collected which relates to indicators in the plan, and any policies which are not being implemented. Local planning authorities can also use the Authority Monitoring Report to provide up-to-date information on the implementation of any neighbourhood plans that have been brought into force, and monitor the provision of housing for older and disabled people. It can help inform if there is a need to undertake a partial or full update of the local plan, when carrying out a review at least every 5 years from the adoption date.

This information should be made available publicly. Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out what information the reports must contain. The reports can include other information, for example, the reports can draw on Infrastructure Funding Statements to highlight the contributions made by development, including section 106 planning obligations, Community Infrastructure Levy and New Homes Bonus payments, and how these have been used.”

Luton Council last published an AMR in 2019, covering the year 2017/18. No reports have been published since due to resourcing issues within the Planning Department, partly caused by the global pandemic. This report, therefore, spans the period since the last AMR, providing data up to 31 March 2022.

## 1.2 Contents of this report

This report provides a snapshot of the work progressed under the Luton Local Plan between 1 April 2018 and 31 March 2022, with particular focus on the provision of housing within Luton’s administrative boundaries.

This report is broken down into sections, as follows:

<b>Section</b>	<b>Title</b>	<b>Summary</b>
2.1	<a href="#">Local Development Scheme</a>	This section summarises progress against the review of the Luton Local Plan, and status of the Gypsy and Traveller Local Plan part 2.
2.2	<a href="#">Town Centre Design Guide SPD</a>	This section gives a brief introduction to the new SPD.
2.3	<a href="#">Luton Town Centre Masterplan</a>	This section outlines the Masterplan, how it relates to council policies, and its relevance to planning in the town centre and surrounding street blocks.
2.4	<a href="#">Neighbourhood Development Orders and Plans</a>	This section notes Luton has no Neighbourhood Development Orders, Plans or designated neighbourhood areas.
2.5	<a href="#">Duty to Co-operate</a>	This section explains the duty to co-operate and discusses the communications between Luton Council and neighbouring authorities on strategic cross-boundary matters such as their Local Plan development and resolving Luton's unmet housing needs. It includes comments on the London Plan 2021 and migration issues. Arrangements regarding minerals and waste planning are outlined, along with co-operation with other public bodies. The section concludes with a consideration of the replacement of the duty to co-operate under the Levelling Up and Regeneration Bill, which provides for its repeal.
2.6	<a href="#">Community Infrastructure Levy</a>	This section notes the council has not adopted the Community Infrastructure Levy. It also introduces the new Infrastructure Funding Statement, and summarises the funds agreed, received and spent under Section 106 obligations since 2020.
2.7	<a href="#">Oxford-Cambridge Arc</a>	This section explains the Arc priority area, Luton's role, and the new pan-regional partnership that is emerging.
2.8	<a href="#">Luton Airport Development Consent Order</a>	This section gives details of the proposed airport expansion, which is a Nationally Significant Infrastructure Project and requires development consent from the Secretary of State. It outlines the development consent process. It also notes there is an adopted Airport Master Plan.
2.9	<a href="#">Growing Luton's Economy</a>	This section explains national and local policy which will be used to grow Luton's economy. It considers the net land and floorspace gained and lost in Luton's key and other employment areas in B class use, with particular focus on losses to housing use. An update is also given on the strategic allocations.
2.10	<a href="#">Housing</a>	This section reviews the status of allocated and named housing sites. Data is given on housing delivery against local plan annual targets, and the housing mix provided against identified need. Windfall sites are considered. Housing delivery in terms of the Housing Delivery Test, 5 year housing land supply and Standard Test are reviewed. Updates are given on affordable housing delivery, HMOs, and student and other accommodation.

## 1.3 Executive Summary

### 1.3.1 Local Development Schemes

- Luton's Local Plan Review was delayed and the Gypsy and Traveller Plan Part 2 had not been progressed. A Local Plan Review was in the early stages as at April 2022.
- A new SPD (Town Centre Design Guide) was being drafted, which would become a material planning consideration once adopted.
- A Town Centre Masterplan was approved, however it has limited weight in planning terms and decision making.
- North Hertfordshire District Council was being inspected at April 2022. It included provision for 1,950 homes towards Luton's unmet need for housing.
- Central Bedfordshire adopted its new Local Plan. It included provision for 7,350 homes towards Luton's unmet need for housing.

### 1.3.2 National Policy

- Luton has continued its obligations under the current (as at April 2022) Duty to Cooperate with other local authorities and a number of public bodies.
- National planning policy continued to change during the period of this report, and legislation revised, including the Use Classes order and General Permitted Development Order. These revisions led to a wider range of use classes being open to conversion to residential use under permitted development. In response, Luton had to begin to review its Article 4 directions to protect key employment and retail sites across the town.

### 1.3.3 Employment

- Developments were completed on 9.28ha of employment land, over 42,000 sqm of employment floorspace was gained, mostly with permission for mixed employment uses (mixed Eg(i-iii) and B classes).
- Most of the new developments delivered were within strategic employment areas, such as Butterfield Business Park.
- Developments or conversions to other uses meant Luton lost 3.37ha of employment land and 42,000 sqm of employment floorspace. Most of this was in non category A sites.
- 10,738 sqm of office floorspace was lost during the period, mostly from the town centre and surrounds, and mostly from category A and B employment sites.
- Three quarters of the office space lost was through permitted developments, and it was converted to dwellings.
- 4.29ha of employment land (1.97ha category A or B) was lost to housing. 10,095 sqm of employment floorspace (7,600sqm category A or B) was lost to housing.
- The number of jobs created through new developments has not been able to be captured through the planning process.

## 1.3.4 Housing

- During the period 2018/19-2021/22, 2,284 dwellings (net) were delivered against a cumulative annual target of 1,700 (425 units per year) – an over delivery of 584 units.
- 544 homes (net) were completed during the same period on strategic housing sites, and 238 dwellings on allocated housing sites.
- Between 2011/12 and 2021/22, across the town as a whole, 6,002 homes (net) were completed, an over delivery of 1,327 dwellings against the cumulative annual target.
- New housing provision does not reflect the identified housing need stated in the Local Plan:
  - 42.3% were one bed properties – with the identified need at 1% of delivery.
  - 31.4% were two or three bedroom flats – with the identified need at -1% of delivery.
  - 11.5% were 3 bedroom houses – with the identified need being 70% of delivery
  - 9.2% were houses with 4 or more bedrooms, against an identified need of 17%
  - 5.6% were two bedroom houses, against an identified need of 13%.
- The delivery of ‘family’ homes (with 2 or more bedrooms) were therefore 57.7% of all properties, against an identified need of 99% of homes.
- Over 1,100 dwellings delivered were on windfall sites – ie those not allocated for housing in the Local Plan, although this figure includes 130 units in a conversion now subject to enforcement action.
- Eligible sites have provided 494 affordable homes, however the majority of these (471 homes) were on developments of 100% affordable housing. Other developments provided only 23 homes. Affordable housing rates of 20% are not being met in eligible developments, or through off-site contributions.
- Affordable housing provision does not reflect housing need in the town, as for new housing provision. Over a quarter of those affordable dwellings delivered are 1 bed flats, compared to an identified need of 5% of eligible units, with 72.9% of delivered affordable units being family-sized homes, compared to an identified need of 95% of eligible units.
- Monitored figures for HMOs show 16 existing HMOs were changed or extended, 29 were created through change of use, and one was a new build. However, change of use from C3 dwellings to C4 HMOs does not need planning permission, so would not be captured in monitoring data.
- During the period 2018/19-2021/22, up to 660 student residential units have been lost within purpose-built accommodation, mostly in accommodation which has changed to mixed student residential and co-living spaces.

## 2 Plan-making progress

### 2.1 Local Development Scheme

The Local Development Scheme (LDS) sets out the scope and timings of plan-making. The relevant LDS for this AMR is dated 24 January 2017. The following paragraphs identify the planning documents set out in the LDS, the stage they have reached in their preparation and an explanation for any delays.

### 2.1.1 Luton Local Plan 2011- 2031

The Luton Local Plan was adopted on 7th November 2017. Policy LLP40 in the adopted plan refers to the council commencing a full review of the plan by the end of 2019.

The Local Plan review was delayed due to resourcing issues and the Coronavirus pandemic.

A review assessment of the adopted Luton Local Plan began in early 2023 to identify if the Local Plan needs to be updated and to inform the scope and timetable of a new or updated local plan.

### 2.1.2 Gypsy and Traveller Local Plan Part 2 2011- 2031

There has been no progress on the Gypsy and Traveller Local Plan Part 2 since 2018, as shown in Table 1 below. The initial evidence gathering and preparation stage was not completed in line with LDS timings, due to the Government having changed the definitions of travelling people. The change required a review of previous accommodation needs assessments.

Any identified accommodation needs for gypsies, travellers and travelling showpeople will be reviewed and addressed in a new local plan.

Table 1: Progress against the LDS (Gypsy and Traveller Local Plan Part 2)

Stage	LDS 2017 timings	Actual timings
Evidence gathering and preparation	April 2016 to March 2017	Completed May 2017
Regulation 18 consultation	April to May 2017	June to August 2017
Consideration of consultation responses	June to August 2017	Begun but not completed.
Regulation 19 Consultation	September to October 2017	N/A
Consideration of consultation responses	November 2017 to January 2018	N/A
Submission	March 2018	N/A
Examination	June 2018	N/A
Adoption	December 2018	N/A

## 2.2 Town Centre Design Guide SPD

Work on the [Town Centre Design Guide](#) commenced in 2022, following on from comments from stakeholders that the bar needed to be raised in the town centre in relation to residential design quality. It will provide designers with a clear sense of Luton's design priorities for the built

environment, in order to deliver quality homes in the town centre and surrounding street blocks, set within a safe, inclusive and attractive public realm, offering ample outdoor amenities for residents of all ages and abilities.

The Guide covers four key areas; sustainability; block guidelines; building guidelines; and amenities. After adoption (July 2023), it is a material planning consideration with significant weight for determining applications for residential development and supporting uses within the town centre and surrounding area.

## 2.3 Luton Town Centre Masterplan

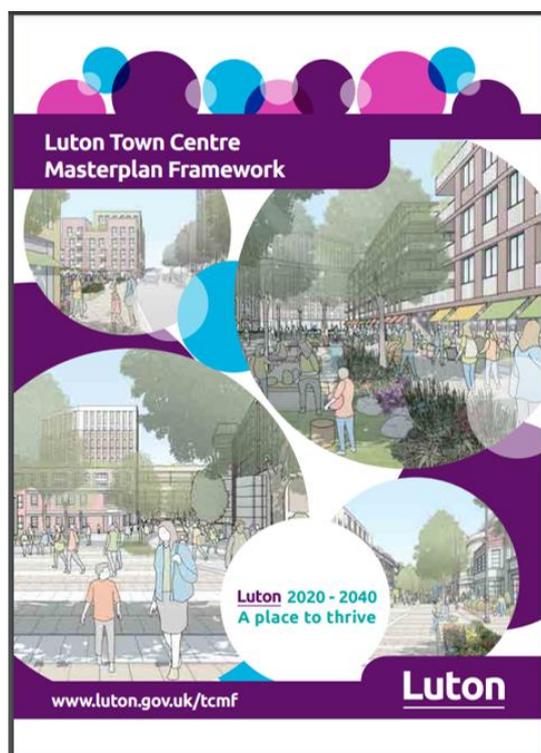


Figure 1: Town Centre Masterplan front cover

The [Town Centre Masterplan](#) was approved by Luton Council on 13 July 2021. In accordance with Luton Local Plan Policy LLP3, the Masterplan updates the Luton Town Centre Development Framework adopted by the Council in 2004. It is not however a supplementary planning document; while it is a material consideration with regard to application proposals in the town centre, it has limited weight in planning terms and decision-making.

The Masterplan sets out the vision and priorities, as well as the strategy for four key areas of change in the town centre. The Town Centre Masterplan outlines how the town centre will change over the next 20-30 years; it focuses on sustainability, and bringing investment to the town centre to provide a focal point for community and commercial life in the town. The plan is perceived by the Council as being a vital part of the town's economic recovery from the Covid-19 pandemic, and for delivering the Council's long-term, corporate plan vision for Luton 2020 to 2040.

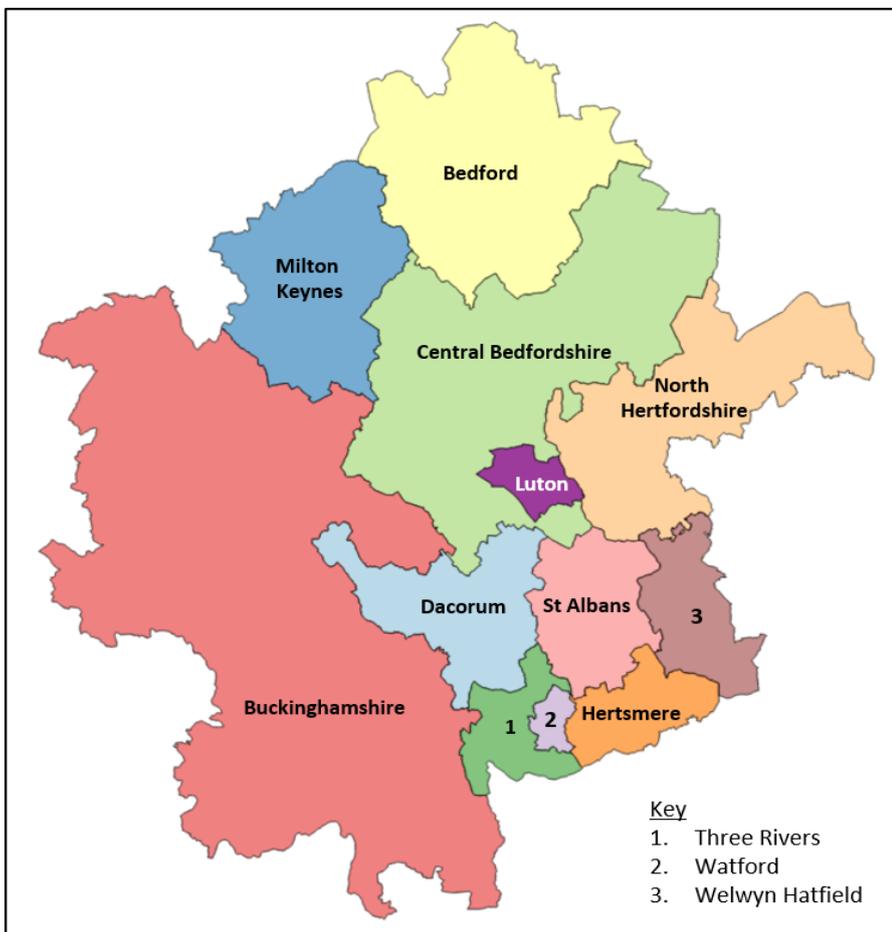
## 2.4 Neighbourhood Development Orders and Plans

No Neighbourhood Plans or Neighbourhood Development Orders have been made in Luton. No neighbourhood areas have been designated and there are no neighbourhood plans currently being prepared.

## 2.5 Duty to Co-operate

The Localism Act 2011 introduced the duty to co-operate to maximise the effectiveness of development plans. This duty requires local planning authorities to co-operate with other local planning authorities, county councils and certain organisations as defined by the Town and Country Planning (Local Planning (England) Regulations 2012) (as amended). The requirement came into force on 15th November 2011.

Map 1: Map of local authorities surrounding Luton



The National Planning Policy Framework (NPPF) (2019) explains that public bodies have a duty to co-operate on strategic planning issues that cross administrative boundaries.

The adoption of the Luton Local Plan 2011-2031 in November 2017 effectively ended duty-to-cooperate matters in relation to the preparation of the Luton Local Plan, which is part of Luton Council's development plan.

The activities outlined below and undertaken between 2018/19 and 2021/22 relate to the development plans being produced by other authorities. The following text outlines the actions undertaken by Luton Council.

It should be noted that the [Minerals and Waste Local Plan](#), which is part of Luton's LDS, is a county-wide strategy developed under the Duty to Cooperate. The latest version is held by [Central Bedfordshire Council](#).

### 2.5.1 North Hertfordshire District Council

Strategic matters relevant to North Hertfordshire include Luton's unmet housing needs (including affordable housing), balanced employment provision and traffic congestion.

Following the North Hertfordshire Local Plan Hearing sessions held between November 2017 and March 2018, consultation took place on the Main Modifications from 3 January – 11 April 2019. Luton Council submitted representations to the Main Modifications consultation regarding the proposed East of Luton site allocations. Further in-person representations were made at hearing sessions during March and April 2020 in relation to the following matters:

- Five-year Housing Land Supply;
- Green Belt Review and Site Selection; and
- Proposed East of Luton sites.

The Inspector's Report following the North Hertfordshire Local Plan examination was published on 8 September 2022, and the Local Plan was [adopted](#) by Full Council on 8 November 2022. While this is outside the timeframe of this report, it should be noted that the adopted local plan includes policy SP19 regarding strategic allocations to the East of Luton, which will provide land for 1,950 net new homes as a contribution towards the unmet need for housing arising from Luton.

Luton Council continues to engage with North Hertfordshire District Council colleagues in the progression of these strategic allocations.

### 2.5.2 Central Bedfordshire Council

Communications with Central Bedfordshire Council on their emerging Local Plan referred to strategic matters such as: Luton's unmet housing needs (especially affordable tenures); balanced employment provision; the location of new development; traffic congestion; and transport infrastructure.

The Central Bedfordshire Local Plan was submitted to the Secretary of State for Examination on 30 April 2018. Examination hearing sessions were held between May – July 2019. Luton Council appeared at the following hearing sessions:

- Duty to co-operate/ legal compliance
- Objectively assessed housing need
- Affordable housing need
- Spatial strategy
- Green belt

- Strategic sites
- Housing
- Housing land supply
- Transport

Central Bedfordshire adopted its [new Local Plan](#) in July 2021. Policy SLP1 states:

“2. In addition, the unmet housing needs of 7,350 homes arising from Luton will be delivered by 2031 through a combination of ... sites” (p33).

The Plan goes on to list the sites which have been allocated to provide housing for Luton residents:

- a. (SC1) North Houghton Regis (1&2)
  - b. (SA1) North of Luton
  - c. (HAS05) Land East of Barton le Clay
  - d. (HAS07) Caddington Park, Caddington
  - e. (HAS14) Land off Eaton Park
  - f. (HAS17) Land South West of Steppingley Road, Flitwick
  - g. (HAS18) Site adj. to Flitwick Garden Allotments off Steppingley Road
  - h. (HAS19) Land at Upper Gravenhurst/The Pyghtle
  - i. (HAS20) Land West of the Midland Mainline Railway, Harlington
  - j. (HAS21) Land West of Sundon Road, Harlington
  - k. (HAS25) Land at Leighton Road, Hockliffe
  - l. (HAS26) A5 Watling Street, Hockliffe
  - m. (HAS28) Bidwell Gospel Hall (Dell Mount)
  - n. (HAS29) Land to the East of Houghton Regis
  - o. (HAS38) Land fronting Silsoe Road, Maulden
  - p. (HAS49) Land East of Leighton Road, Toddington
  - q. (HAS50) Alma Farm, Toddington.
  - r. (HAS51) Land off Flitwick Road, Westoning
  - s. (HAS52) West View Farm, Westoning
- (taken from [Central Bedfordshire Local Plan 2015 – 2035](#), page 33)

A duty to cooperate meeting with officers from both Central Bedfordshire Council and Luton Borough Council took place in July 2022 to discuss the review of the Central Bedfordshire local plan, and a general meeting to introduce new officers at Luton Borough Council took place in November 2022.

Luton Council continues to engage with Central Bedfordshire planning colleagues regarding unmet housing need, and responds to consultations on relevant development applications.

### 2.5.3 Bedford Borough Council

Strategic matters include Luton’s unmet housing needs, balanced employment provision and east-west transport links.

Luton Council submitted comments on the Bedford Borough Local Plan 2030 (Plan for Submission) in October 2018. It was adopted in January 2020.

Bedford Borough is now producing its Draft Local Plan 2040. At various stages of the plan’s preparation, Luton Council engaged with Bedford Borough Council and meetings took place in

September 2020 and February 2022, comments having been submitted in September 2021. The Plan has subsequently been submitted to the Planning Inspectorate for examination, with hearings due to take place in the second half of 2023.

The council did not submit any response to the Regulation 19 consultation and therefore a Statement of Common Ground was not prepared.

#### 2.5.4 Buckinghamshire Council (includes former Aylesbury Vale District Council)

The Vale of Aylesbury Local Plan was adopted in September 2021.

However, the Vale of Aylesbury District Council was absorbed into the new unitary Buckinghamshire Council in April 2020, together with a number of other district councils. Buckinghamshire Council are currently in the early stages of drafting their new Local Plan. No conversations have taken place with Buckinghamshire Council with regards to their Local Plan and Luton's unmet housing needs, or any other strategic cross-boundary issues.

#### 2.5.5 Dacorum Borough Council/ Hertsmere/ Three Rivers and Watford Councils

These authorities are more remote from Luton and there were no urgent, strategic cross-boundary matters to be addressed during the AMR time period.

Luton Council supplied information for Dacorum Borough Council's joint retail and leisure study in April 2018. A meeting was held in September 2019 to confirm strategic concerns and review plan-making activities. Dacorum Borough Council is now in the early stages of producing a new local plan and a duty to cooperate meeting took place with officers from Luton Borough Council in May 2022.

Hertsmere Borough Council decided at a full council meeting in April 2022 to set aside the then-current Regulation 18 draft Local Plan and carry out additional work to inform a local plan spatial strategy.

Three Rivers District Council is in the early stages of producing a new local plan.

Watford Borough Council adopted their local plan in October 2022.

The above councils, along with Hertfordshire County Council and St Albans City and District Council, are working together to produce a Joint Strategic Plan for South West Hertfordshire. Public consultation on Issues and Options (Regulation 18) took place in summer 2022.

#### 2.5.6 Milton Keynes Council

Milton Keynes is more remote from Luton and there were no urgent, strategic cross-boundary matters to be addressed in the AMR period. There are no records of meetings or other communication on plan-making matters.

The Milton Keynes Local Plan was adopted in March 2019. Milton Keynes Council has since started the production of a New City Plan which will replace the current Local Plan, adopted in 2019.

### 2.5.7 St Albans City and District Council

St Albans City and District Council had been producing a new local plan in 2018 / 2019 and had submitted this to the Secretary of State, but this was subsequently withdrawn in November 2020.

Officers of both authorities met in March 2021 to discuss a number of strategic cross-boundary issues.

St Albans City and District Council asked Luton Council during 2021 whether Luton had any capacity to meet their housing need, or appropriate land for a Strategic Rail Freight Interchange (SRFI). Luton advised there was no capacity within borough boundaries, and that Luton was reliant on its neighbours to help meet its own housing need.

St Albans are now in the early stages of producing a new local plan; a 2022 LDS refers to a Regulation 18 consultation being held between July and September 2023.

### 2.5.8 Welwyn Hatfield Borough Council

Welwyn Hatfield is more remote from Luton and there are no urgent, strategic cross-boundary matters to be addressed. There have been no meetings or other communication with Luton Council on plan-making matters.

Examination hearing sessions for the draft Welwyn Hatfield local plan took place from 2017 – 2021. Consultation on main modifications has recently taken place.

### 2.5.9 London Plan 2021

Luton Council has concerns around migration from London and the ability to meet the Borough's own needs. These concerns are shared by other authorities surrounding London, as noted in the [Inspectors report](#) and recommendations on the London Plan in 2019.

In November 2018, Luton Council confirmed reliance on previously submitted written representations for the examination of the London Plan. The London Plan was published in March 2021. It has not been adopted. Work has not yet commenced on a new London Plan, however, a number of LPG (London Plan Guidance) documents are being produced by the Greater London Authority to support the published London Plan.

### 2.5.10 Minerals and waste planning

In addition to contributing to other authorities' emerging local plans, we also co-operate to the production of planning policy specifically for minerals and waste development. Relevant activities with duty-to-cooperate partners are undertaken by Central Bedfordshire Council on behalf of the three Bedfordshire authorities.

### 2.5.11 Other public bodies

As well as having a duty to co-operate with surrounding local planning authorities, the council has a duty to co-operate with a number of public bodies including (but not limited to) the Environment Agency, Historic England and Natural England.

The Council can be seen to be working closely with these public bodies, due to a number of projects that have helped establish working relationships going forward. These projects include:

- Working through the Luton Catchment Partnership, on opening up the River Lea (as demonstrated by the new Hat Gardens pocket park);
- Working with Central Bedfordshire Council and the Environment Agency on the Resilient and Adaptive Communities project in relation to making communities resilient and adaptive to flood risk and climate change;
- The Historic England Historic Places Panel visiting Luton.

### 2.5.12 Future of the Duty to Co-operate

The Levelling up and Regeneration Bill, was introduced in May 2022, which is outside the timeframe of this report. However, it should be noted the [Bill](#) will “remove the Duty to Co-operate, although it will remain in place until the enacted provision comes into effect. To secure appropriate engagement between authorities where strategic planning considerations cut across boundaries, the Government proposes to introduce an “alignment policy” as part of a future revised National Planning Policy Framework. Further consultation on what should constitute the alignment policy will be undertaken”. DLUHC will further consult on how neighbouring authorities will consider their roles in supporting each other.

It remains to be seen how the proposed alignment test / policy will impact Luton and its neighbouring authorities, but it has recently been indicated by senior government officials that the alignment test will focus on delivering infrastructure and nature strategies, rather than housing.

## 2.6 Community Infrastructure Levy

It has consistently been the Council’s intention not to introduce the Community Infrastructure Levy unless and until market conditions and development viability have improved. However, this position may change under the Levelling up and Regeneration Bill, which is due to introduce a new Infrastructure Levy in the longer term. Further details on the proposed new levy are expected to be published during 2023.

### 2.6.1 Infrastructure Funding Statement

Since December 2020, local authorities have been required to publish an Infrastructure Funding Statement (IFS) recording any Community Infrastructure Levy (CIL) payments and Section 106 contributions made during each financial year. The purpose of the IFS is to provide an overview of developer contributions that have been agreed, received, allocated or spent in the previous

financial year. The IFS provides a breakdown of S106 obligations entered into; contributions received; funds allocated and amounts spent across a number of council departments, including affordable housing, highways, and open space. The most recent Statement is for the financial year 2021/22 and is available on the Luton Council [website \(item 14\)](#).

Table 2: Key Figures - Luton Infrastructure Funding Statements

Year	2019/20	2020/21	2021/22
Total Amount agreed [A]:	£5,408,296	£4,568,967	£5,352,366
Total amount received [B]:	£1,702,876	£903,002	£1,853,025
Total amount spent [C]:	£307,615	£242,510	£550,162

Notes: [A] – these are maximum sums to be paid, agreed when new S106 obligations are signed. The contributions that come from these agreements will be paid to the Council by the developer once development has commenced on site or when a particular development milestone has been met (in accordance with S106 agreements). The amount paid may be reduced depending on viability assessments.

[B]: These are the sums received by the council each year as payments against existing S106 agreements. Other non-monetary contributions may also have been agreed, for example the provision of affordable housing units on relevant housing sites.

[C]: These are sums spent from the S106 funds received, usually allocated for specific projects or activities allocated by receiving council departments. The funding spent is from S106 contributions collected from previous years. The S106 agreement usually states how funding is to be spent, including for infrastructure within the vicinity of the development.

## 2.7 Oxford-Cambridge Arc

The Oxford-Cambridge Arc was a national economic priority area. The Arc extended across Oxfordshire, Buckinghamshire, Milton Keynes, Bedfordshire, Northamptonshire, and Cambridgeshire. [Luton](#) was included in the Arc due to its strong automotive and engineering sectors, leading airport and links to the Central area of the Arc. At the time of writing (2023), this was being replaced by a new Oxford to Cambridge Pan-regional Partnership to champion the Oxford to Cambridge region.

## 2.8 Luton Airport: Development Consent Order application



Figure 2: Luton DART

Luton Airport is the UK's fifth largest airport, and is proposing to increase its capacity (through phased growth) from 18 million passengers a year to 32 million by the 2040s. It plans to do so by building a second terminal and associated infrastructure, such as new taxiways, acoustic barriers and de-icing facilities ([link](#)). This proposal was updated following a public consultation in 2019, and in the light of the Covid-19 pandemic, Brexit, and changes to regional transport. Additional emphasis has been given to addressing environmental impacts, sustainability and the environment. A further consultation was held from 8 February to 4 April 2022.

According to the Luton Rising, this proposal could bring over 12,000 new jobs to the area and add £1.8bn to the economy of Luton, Bedfordshire, Buckinghamshire and Hertfordshire ([link](#)). The scheme will be supported by an expansion of the Luton Direct Air-Rail Transit (DART) system to increase the use of public transport. The new terminal will require building on land at Wigmore Valley Park, but the proposal will provide a larger area of public open space in replacement.

## 2.9 Growing Luton's Economy

### 2.9.1. National Policy

Since the Local Plan was adopted in 2017, national planning policy has changed, and is due to do so again during 2023 and beyond.

Legislation has continued to be revised. In September 2020 the [Use Classes Order](#) was amended: buildings previously classed as A1 (shops); A2 (financial and professional); A3 (restaurants and cafes); B1 (business); parts of D1 (non-residential institutions); and D2 (assembly and leisure) became Class E (business commercial and service uses) uses. This enabled changes of use of properties within this new Use Class without requiring an application for planning permission, as such changes no longer constituted development.

In August 2021, amendments were also made to the [General Permitted Development Order 2015](#). A new permitted development right Class MA allows for the change of use from Use Class E (commercial, business and service) to Class C3 (residential) via a prior approval process.

Policy changes in July 2021, following updates to the NPPF included revisions to the use of Article 4 directions to curtail permitted development rights in certain areas. This was also supported by legislative changes. In response to these changes, Luton is updating its [Article 4 directions](#) to preserve employment and retail sites across the town.

Together, these legislative amendments have expanded the potential for employment-generating buildings to change to residential use, by removing the requirement for planning permission and replacing it with prior approval processes.

A list of changes to planning legislation and national policy during the period 2018/19-2021/22 can be found in Appendix One.

## 2.9.2 Luton Local Plan

The adopted Local Plan outlines Luton's economic development over time. Key sectors for the borough that are identified in the Plan include the service, engineering, manufacturing, digital and creative industries.

The Local Plan's Strategic Objectives highlight the need to grow the town's economy:

- Strategic Objective 1 seeks to “retain and enhance Luton's important sub-regional role as a place for economic growth and opportunity including the safeguarding of London Luton Airport's ... sustainable growth”.
- Strategic Objective 2 aims to “utilise Luton's economic, social and environmental resources efficiently and sustainably.”
- Strategic Objective 6 targets the need to “reduce social, economic and environmental deprivation...”

Luton faces challenges as it is already mostly developed up to its boundaries; there are few greenfield sites that may become available for development. Most sites with potential for new economic development are brownfield sites, as shown by the Strategic Allocations, and list of category A and B employment sites (Appendix Two). The redevelopment of these sites can be impacted by “abnormal costs in recycling brownfield employment land and unusually low market values” (Local Plan, para 2.11).

A further issue is the demand for land for other uses, particularly housing, and the Local Plan aims to protect employment sites. Policy 13c notes that “employment areas... will be protected to retain and deliver jobs in the borough”. Policy 14 reiterates this, in stating, “Changes of use or redevelopment within the employment areas and sites that would result in a loss of floorspace for economic development uses will be resisted”. The redevelopment of category B and unidentified sites for non B-class uses is possible in policy terms, if suitable alternative accommodation is available and the site is no longer suitable for B class use, or is vacant and has been marketed. Existing Article 4 directions to further protect employment land are in the process of being updated following the introduction of the new permitted development right to change from Class E (including old 'B1' category sites) to Class C3.

Luton continues to be a draw for businesses to the town, although the Local Plan acknowledges more modern accommodation is required (para 2.13). Luton's accessibility to national and international markets due to its major road, rail and air links (Local Plan, para 2.5) is referred to in the Plan as a benefit for companies moving to the borough.

### 2.9.3 Local Plan Policies

The relevant policies for economic development are:

- Policy LLP1: Presumption in favour of sustainable development
- Policy LLP2: Spatial development strategy
- Policy LLP13: Economic strategy
- Policy LLP14: Employment areas

The following sub-sections will analyse the losses and gains in employment areas to inform progress against the relevant Luton Local Plan policies.

### 2.9.4 Analysis of Employment land and floorspace completions between 2019 and 2022

#### 2.9.4.1 Net gains of land and floorspace

Table 3: Net employment land completions (ha) 2018/19-2021/22 – all sites - gains

Year	B1a [now Eg(i)]	B1b [now Eg(ii)]	B1c [now Eg(iii)]	B2	B8	Mixed employmen t use [now mixed Eg (i- iii) and B classes]	Total
2018-19	0.7	0	0	0	0	0	<b>0.7</b>
2019-20	0	0	0.01	0	0	2.4	<b>2.41</b>
2020-21	0	0	0	0	0	0	<b>0</b>
2021-22	0	0	0	0	2.0	4.17	<b>6.17</b>
<b>Total gains</b>	0.7	0	0.01	0	2	6.57	<b>9.28</b>

The data in Table 3 only includes full sites/footprints (ie ground floor space) gained from another use. Sites which have stayed within mixed uses (falling within two or more former B1, B2 and B8 classes), with no loss or gain of land overall are not included as they do not affect the overall total.

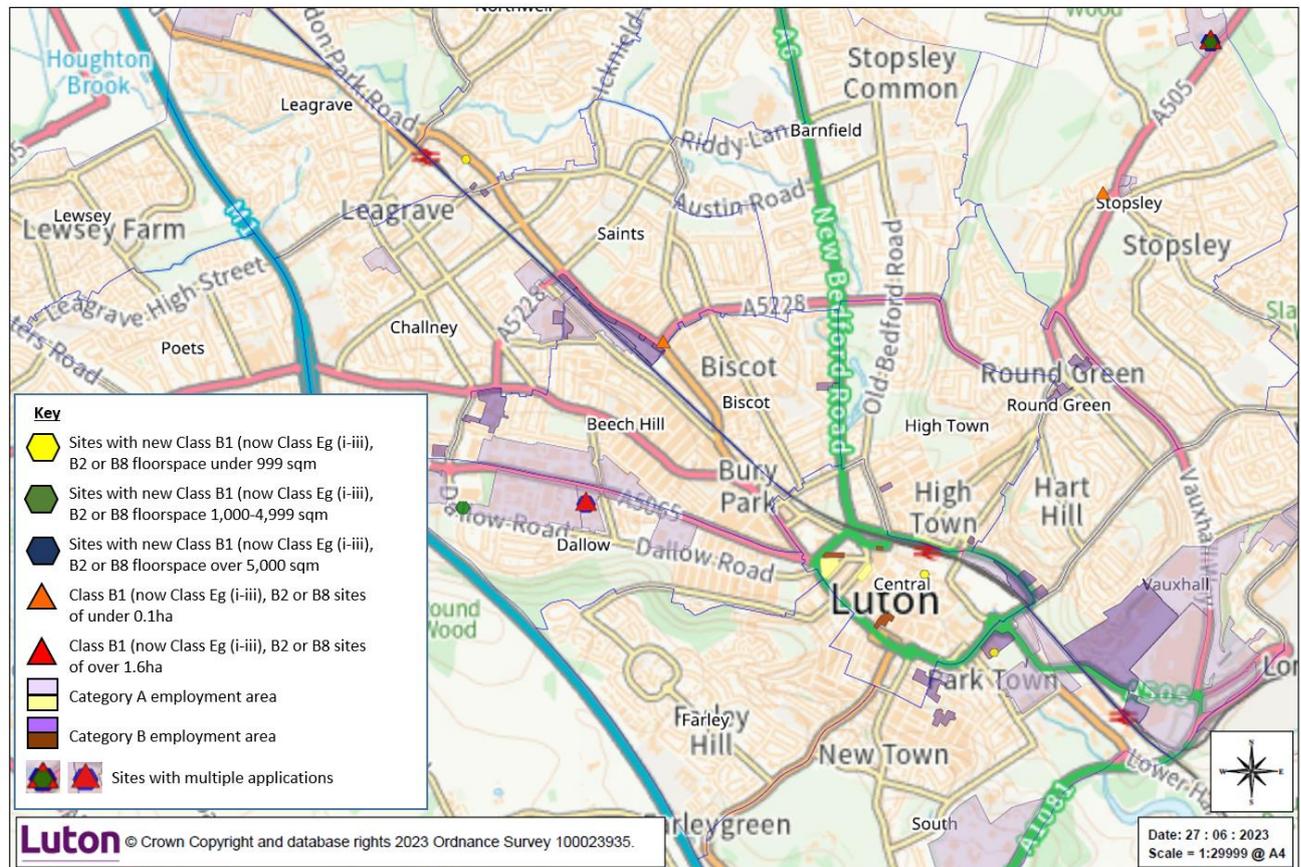
The table above shows that no specifically B1b (now class Eg(ii)) or B2 developments have been implemented in the town during the period 2018/19-2021/22, and very little B1a floorspace (now class Eg(i)) office sites). These categories together total less than 3ha. There has been an increase in developments for mixed employment uses (falling within two or more former B1, B2 and B8 classes), giving occupants the ability to use their sites flexibly within different B classes without requiring further permission.

Table 4: Employment floorspace completions (sqm) 2018/19-2021/22 – all sites – net gains

Year	B1a [now Eg(i)]	B1b [now Eg(ii)]	B1c [now Eg(iii)]	B2	B8	Mixed employmen t use [now mixed Eg (i- iii) and B classes]	Total
2018-19	135	0	0	0	0	0	135
2019-20	155	0	56	0	0	9,617	9,828
2020-21	0	0	230	0	0	523	753
2021-22	50	0	3,970	1,854	6,832	19,027	31,733
<b>Total gains</b>	<b>340</b>	<b>0</b>	<b>4,256</b>	<b>1,854</b>	<b>6,832</b>	<b>29,167</b>	<b>42,449</b>

Again, no new B1(b) (now E(g)(ii)) specific floorspace has been gained. The majority of new floorspace gains are for mixed uses (falling within two or more former B1, B2 and B8 classes), which at 29,167sqm makes up over 60% of completed floorspace in the town. A quarter of new floorspace is B1c (Eg (iii) or B8 class).

Map 2: Sites where Class B1 (now Eg (i-iii), B2 and B8 use has been gained



The majority of developed sites and added floorspace are located within Category A employment sites, for example:

- [Butterfield Business Park](#) has continued to be built out (see Table 10), with multiple applications.
- A brownfield site on the Firbank Industrial Estate has been regenerated providing 13 new industrial/distribution units, again with mixed use classes. (see Appendix Two).

Some smaller sites have been completed in the town centre, which are mostly small office B1a (Eg (i)) gains.

#### 2.9.4.1.1 Net Gains from other Use Classes

Table 5: Net employment gains from other use classes (completions in sqm)

Use Class	A1 [now E or F2]	A2 [now E or sui generis]	A3 [now E]	A4 [now sui generis]	C1, C2, C2a	C3 C4	D1 [now E or F1]	D2 [now E or F2]	Sui generis	Total (sqm)
Floorspace lost in this use	-56	-977	0	0	0	-50	-260	-230	0	-1473
Cat A/B gain	0	0	0	0	0	50	0	0	0	50
Other class B site gain	56	977	0	0	0	0	260	230	0	1,523

The gains from other use classes have been minimal, totalling 1,523sqm in the years 2018/19-2021/22. Almost two-thirds of gains to employment use classes have been from A2 (now class E or sui generis) use.

#### 2.9.4.2 Jobs created in new employment developments

There is not currently a consistent record of potential and actual jobs created on new employment sites. This will be addressed through future monitoring work.

#### 2.9.4.3 Net losses of land and floorspace

The completions on employment land (including strategic and allocated sites), where full sites have been lost/gained, are shown in the table below.

Table 6: Employment land completions (ha) 2018/19-2021/22 – all sites – net losses

Year	B1a [now Eg(i)]	B1b [now Eg(ii)]	B1c [now Eg(iii)]	B2	B8	Mixed employment use [now mixed Eg (i- iii) and B classes]	Total
2018-19	-0.09	0	-0.01	-0.03	-0.02	-1.15	<b>-1.3</b>
2019-20	-0.29	0	-0.03	-0.01	0	-0.91	<b>-1.24</b>
2020-21	-0.14	0	-0.1	0	-0.03	0	<b>-0.27</b>
2021-22	-0.4	0	0	-0.13	-0.03	0	<b>-0.56</b>
<b>Total losses</b>	<b>-0.92</b>	<b>0</b>	<b>-0.14</b>	<b>-0.17</b>	<b>-0.08</b>	<b>-2.06</b>	<b>-3.37</b>

In total, 3.37ha has been lost in employment sites. Just under two-thirds (2.06ha) of these were mixed use employment sites (falling within two or more former B1, B2 and B8 classes, now mixed Eg (i-iii), B2 and B8 classes).

Table 7: Employment floorspace completions (sqm) 2018/19-2021/22 – all sites - losses

Year	B1a [now Eg(i)]	B1b [now Eg(ii)]	B1c [now Eg(iii)]	B2	B8	Mixed employment use [now mixed Eg (i- iii) and B classes]	Total
2018-19	-1,786.1	0	-125	-311	-157	-9,170	<b>-11,549.1</b>
2019-20	-7,267	0	-188	-155	-118	-1,325	<b>-9,013</b>
2020-21	-1,376	0	-1,363	0	-279	0	<b>-3,018</b>
2021-22	-309	0	0	-1034	-4379	-12,958	<b>-18,680</b>
<b>Total losses</b>	<b>-10,738.1</b>	<b>0</b>	<b>-1,676</b>	<b>-1,500</b>	<b>-4,933</b>	<b>-23,453</b>	<b>-42,260.1</b>

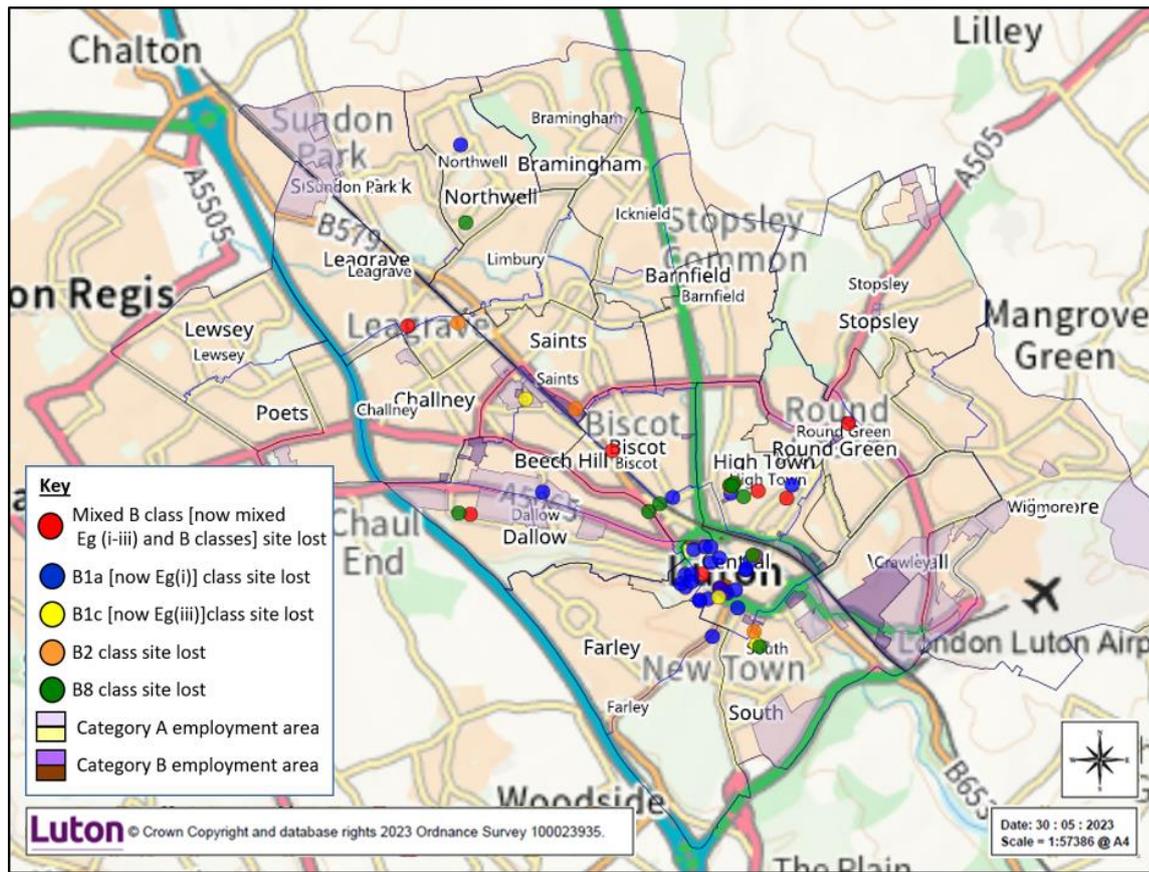
The [previous AMR](#) outlined the loss of office (B1a (Eg(i))) floorspace under permitted development rights. This continued during the period 2018/19-2021/22, although to a lesser degree.

Other employment land has also been lost to housing, for example the Moreton Park Industrial estate (18/00159/FUL). The [Committee report](#) noted this site was occupied at the time of permission, but that previous permissions for housing outweighed the need to retain this category B site. 41 dwellings were completed on the plot.

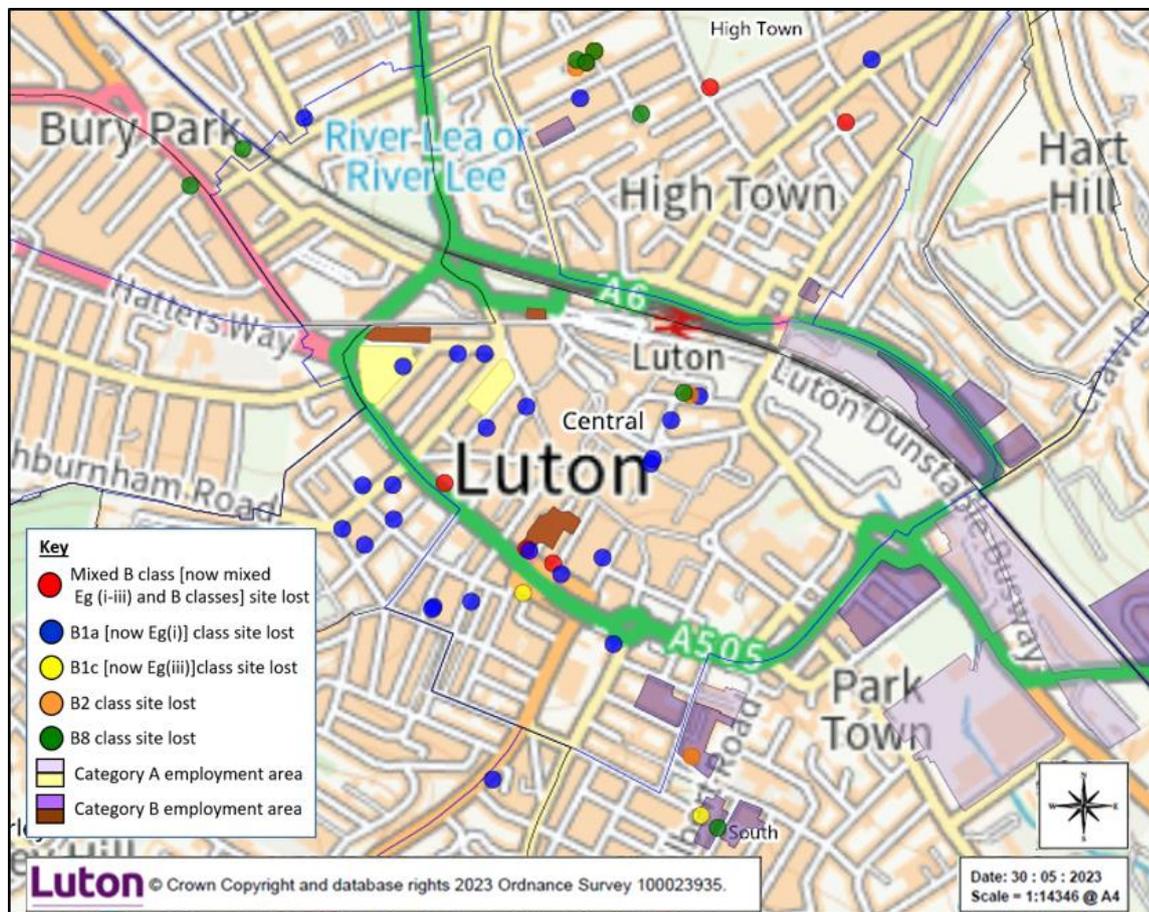
See 2.9.4.6 for further discussion of the loss of commercial sites and floorspace to dwellings.

The following two maps illustrate the locations of lost B class sites across the town, and within the town centre.

Map 3: B class sites (now Eg (i-iii), B2 and B8) lost across Luton



Map 4: B class sites (now Eg (i-iii), B2 and B8) lost in town centre and surrounds



Map 3 shows the distribution of B (now B and Eg) class sites and floorspace lost across the town. Outside the town centre, there are clusters of B class use losses in Bury Park (B8 and B1a – now Eg(i)) and in the north of High Town, outside the Masterplan area. None of these sites were in Category A or B employment sites. There have been no employment gains in these areas (see Map 2). Most of these sites have been lost to housing.

Map 4 shows the distribution of B class (now class Eg and B) sites and floorspace lost across the town centre and surrounding area. Within the town centre itself, most loss has been of B1a (now Eg(i)) offices, through prior approval or permitted development, to Class C3 flats in both major and minor scale developments.

#### 2.9.4.4 Total net gains and losses of land and floorspace

Table 8: Employment land total net change (ha) 2018/19-2021/22 – all sites

<b>Use class</b>	<b>B1a [now Eg(i)]</b>	<b>B1b [now Eg(ii)]</b>	<b>B1c [now Eg(iii)]</b>	<b>B2</b>	<b>B8</b>	<b>Mixed employment use [now mixed Eg (i-iii) and B classes]</b>	<b>Total</b>
Total gains	0.7	0	0.01	0	2	6.57	<b>9.28</b>
Total losses	-0.92	0	-0.14	-0.17	-0.08	-2.06	<b>-3.37</b>
Net	-0.22	0	-0.13	-0.17	1.92	4.51	<b>5.91</b>

Note these relate only to full sites/footprints lost to another use; those which have stayed within B class uses, with no loss or gain of land, are not included.

In total, 5.91ha of land has been completed for employment use, particularly within mixed employment use. The largest projects have been developed on allocated Category A and B sites, in accordance with Local Plan policies. There has been a loss of employment land dedicated specifically to B1a (Eg(i) office) use, B1c (Eg(iii) light industrial in a residential area) use and B2 (general industrial) use.

Details of the status of Category A and B employment sites as at 1 April 2022 are given in Appendix Two.

Table 9: Employment floorspace total net change (sqm) 2018/19-2021/22 – all sites

Use class	B1a [now Eg(i)]	B1b [now Eg(ii)]	B1c [now Eg(iii)]	B2	B8	Mixed employment use [now mixed Eg (i-iii) and B classes]	Total
Total losses	-10,738.1	0	-1,676	-1,500	-4,933	-23,453	<b>-42,260.1</b>
Total gains	340	0	4,256	1,854	6,832	29,167	<b>42,449</b>
<b>Net Total</b>	<b>-10,398</b>	<b>0</b>	<b>2,580</b>	<b>354</b>	<b>1,899</b>	<b>5,714</b>	<b>189</b>

The loss of office space (class B1a, now Eg(i)) is discussed in detail in the [supporting evidence for Article 4 Direction](#) on the council's website. At over 10,000 sqm, this use class shows the largest losses over the 2018/19-2021/22 period. As previously noted, the main gain of floorspace has been through the creation of mixed B class (now mixed Eg (i-iii) and B classes) uses, at 5,714 sqm.

### 2.9.5 Strategic Allocations 2018/19-2021/22

Local Plan Policies 2 (Spatial Development Strategy) and 13 (Economic Strategy) list seven strategic allocations for employment development. The status of each site as at April 2022 is shown in Table 10.

Table 10: Updates on progress on Strategic Allocations (Employment) 2018/19-2021/22

Strategic Allocation	Relevant permissions	Status as at April 2022
<b>Butterfield Business Park</b>	17/02069/FUL 18/01639/FUL 20/01083/FUL	Butterfield continued to be built out with B1c (now E), B2 and B8 developments. Some plots remained available for development.
<b>Junction 10a south of Stockwood Park</b>	16/01401/OUTEIA 20/01588/OUTEIA 20/01589/OUTEIA	The site is also known as Newlands Park. Permission was in place for a mixed use development including office, retail, food and beverage, leisure, and hotel floorspace. The site was later sold to new owners without the permission being implemented.
<b>Napier Park</b>	13/00280/OUT; 16/01340/REM; 16/0900/FULEIA; 18/00562/AMEND 18/01280/MMAMD; 19/00527/AMEND; 18/00271/EIA	Various permissions were given for the <a href="#">Napier Park</a> allocation (which includes <a href="#">Hart House</a> Business Centre, and Stirling Place, also known as Bartlett Square). At April 2022, developments on the site north of Kimpton Road were under construction. 'Eaton Green Heights', 'Saxon Square' and 'Lu2on' will provide over 1,300 dwellings once completed.

Strategic Allocation	Relevant permissions	Status as at April 2022
		Hart House and Bartlett Square are south of Kimpton Road. They had outline permissions for the provision of a hotel, offices, retail floorspace and multi-storey parking on these sites.
<b>Wigmore Employment Area (Century Park)</b>	99/01083/RENEW 17/02300/EIA	An outline application for the development of Century Park (now known as Green Horizons), along with a new access road and the creation of a new public road, was approved in 2021. The new business park aims to provide 3,200 new jobs. Work had not started by April 2022. See also " <a href="#">Luton Airport Development Consent Order</a> " above. Wigmore Employment Area includes Airport Executive Park: no applications had been made by April 2022.
<b>Power Court</b>	16/01400/OUTEIA; 20/01497/AMEND; 20/01587/OUTEIA	The site had outline permission granted in 2019, with an amendment in 2020. The development will include a new football stadium; residential floorspace; flexible educational / community / commercial use; hotel accommodation; retail and food and drink; and a food store. Work had not started as at April 2022.

### 2.9.6 Loss of employment land and floorspace to housing

The majority of losses of employment land and floorspace has been to housing.

The current Luton Local Plan states that:

- Category A employment sites should be protected for Class B1 (now Eg), B2 or B8 employment use (policy LLP14), with change of use or redevelopment resulting in a loss for economic development being resisted.
- Category B and existing unidentified employment site applications providing additional floorspace will be supported in certain cases, and a mixed use or alternative development will allowed only with specific conditions (eg site no longer viable).

Table 11: Net loss of employment land to housing (ha) 2018/19-2021/22 (completions)

	<b>From B1a [now Eg(i)]</b>	<b>From B1b [now Eg(ii)]</b>	<b>From B1c [now Eg(iii)]</b>	<b>From B2</b>	<b>From B8</b>	<b>From Mixed employment use [B1, B2 and B8 classes, now mixed Eg (i-iii), B2 and B8 classes]</b>	<b>Total</b>
All employment land lost	-1.4	0	0	-0.03	-0.08	-2.78	<b>-4.29</b>
Of which, Cat A/B land lost	-1.11	0	0	0	0	-0.86	<b>-1.97</b>

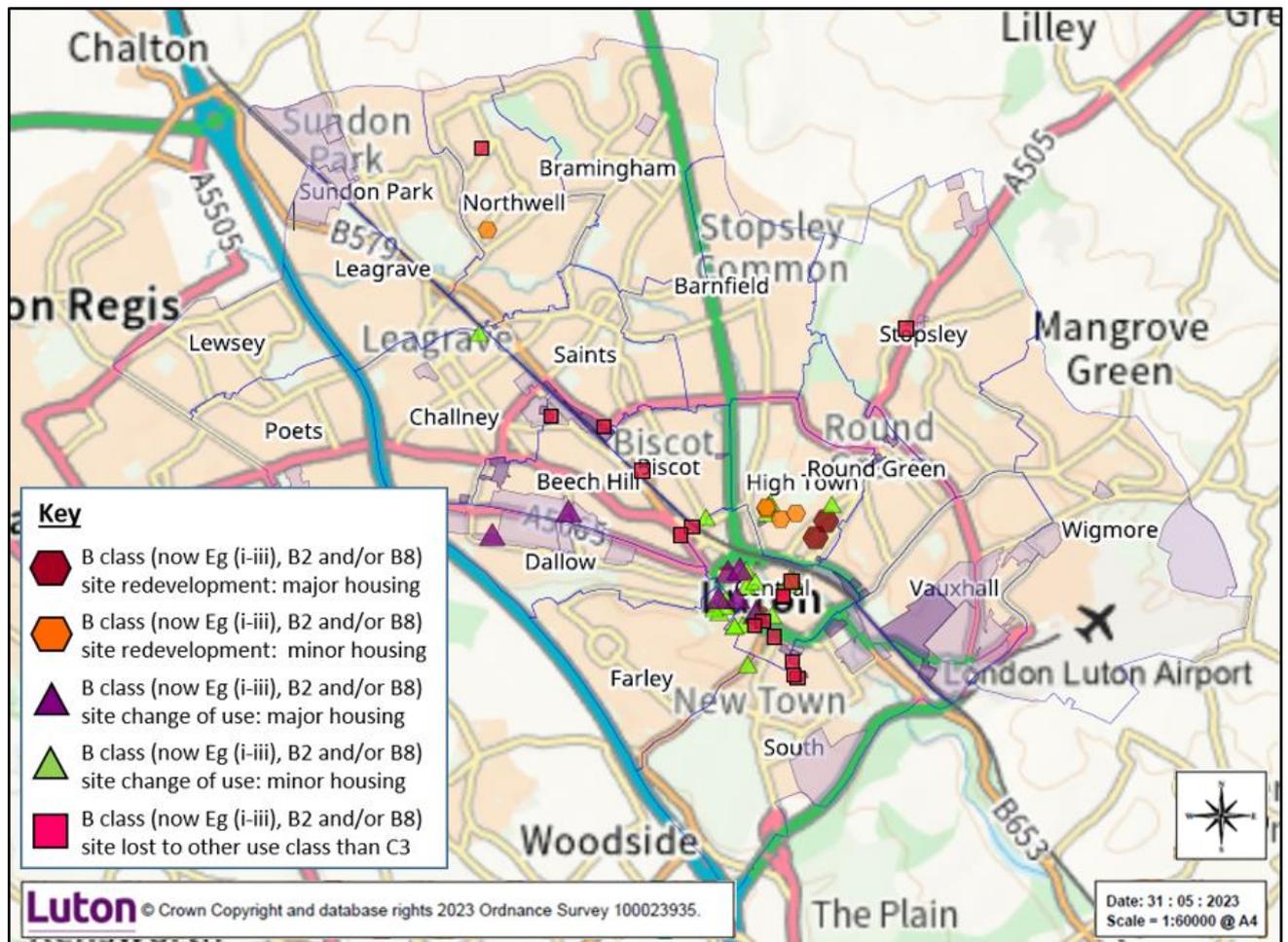
Table 11 shows that 4.29ha of employment land has been lost to housing, of which 1.97ha has been lost from Category A and B sites. In both cases, the main losses are from mixed B class (B1 – now Eg, B2 and B8) uses (2.78ha) and category B1a (now Eg(i) offices (1.4ha).

Table 12: Net loss of Category A and B employment floorspace to housing (sqm) 2018/19-2021/22 (completions)

	<b>From B1a [now Eg(i)]</b>	<b>From B1b [now Eg(ii)]</b>	<b>From B1c [now Eg(iii)]</b>	<b>From B2</b>	<b>From B8</b>	<b>From Mixed employment use [B1, B2 and B8 classes, now mixed Eg (i-iii), B2 and B8 classes]</b>	<b>Total</b>
Cat A/B floorspace lost	-8,125	0	0	0	0	-1,970	<b>-10,095</b>
Floorspace lost through GPDR conversions	-7,600	0	0	0	0	0	<b>-7,600</b>

Table 12 shows that over 10,000sqm of category A and B (now including Eg) floorspace has been lost to residential developments, with the majority being through office to residential conversions via permitted development. Appendix Two lists all the category A and B sites with details of any approved developments.

Map 5: B class (now Eg (i-iii), B2 and B8) losses to housing and other use classes – whole of Luton

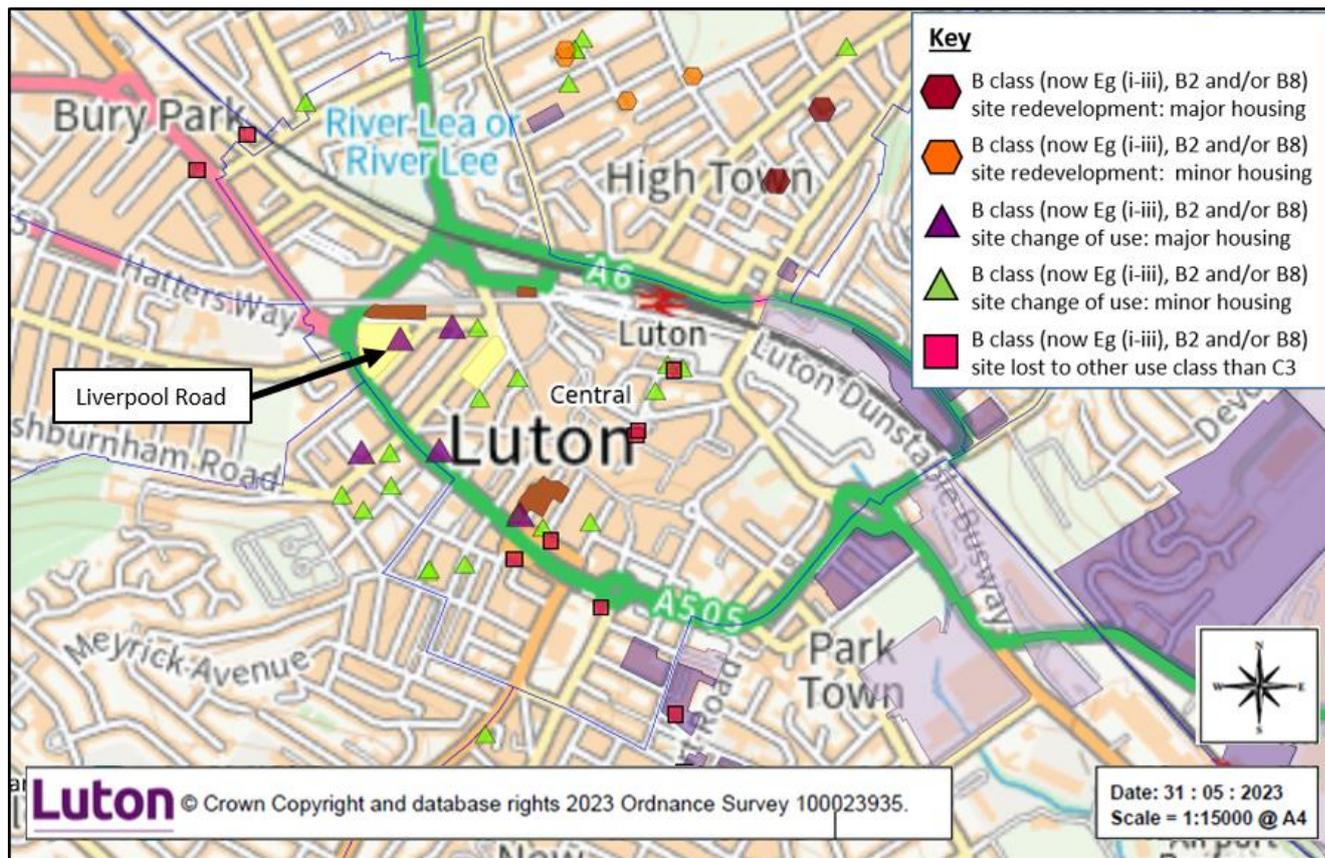


Map 5 shows that major and minor redevelopments of B class (now Eg (i-iii), B2 and/or B8) use land for housing were focused to the north of the town centre.

Two major developments with a change in use from B classes to C3 residential units were completed to the west of the town centre.

There is a line of sites which have changed from B class (now Eg (i-iii), B2 and/or B8) to non-C3 use running from the north-west to the south-east of the town. It should be noted these sites are small in size, for example on the Telmere Estate to the south of the town centre, two units have been converted from B8 to D2 use (17/01621/COU) and from B1c (now Eg(iii)) to Sui Generis use (17/02072/COU).

Map 6: B class (now Eg (i-iii), B2 and/or B8) losses to housing and other use classes – town centre and surrounds



As Map 6, shows, the majority of developments in and around the town centre were changes of use from B classes (now Eg (i-iii), B2 and/or B8) to C3 residential units, although there are also clusters of changes of use to other, non-C3 uses.

One Category A employment site has been lost: 26-34 Liverpool Road (18/01146/COM) – shown above, which has been converted via permitted development to 59 residential units.

During the 2018/19-2021/22 period, the ‘town centre and surrounds’ area was covered by an Article 4 Direction, which prevented the conversion of offices to flats via prior approval. In April 2021, the Town and Country Planning (General Permitted Development etc.) (England) (Amendment) order 2021 came into effect, which made existing Article 4 directions invalid after 31 July 2022. The council began work on assessing whether a new Article 4 direction, which took into consideration the changes to use classes and subsequent extended permitted development rights was required. See Appendix One for details of legislation and national policy changes between 2018 and 2022.

## 2.10 Housing

### 2.10.1 The housing requirement for Luton

National planning policy requires all local authorities 'to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old'.

Policy LLP15 of the Luton Local Plan 2011-2031 sets out the housing requirement:

"Provision will be made for 8,500 dwellings in the borough to help meet the housing needs of Luton and the Luton Housing Market Area ensuring the size, type and tenure (including provision for starter homes, custom build and households with specific needs) provided reflects the identified housing need requirements of the area in the Strategic Housing Market Assessment (SHMA)".

In order to provide 8,500 new homes over the 20 year plan period, an average of 425 homes per year would need to be completed.

It should be noted the SHMA proposed an objectively assessed housing need for the borough of 17,800 net additional dwellings over the plan period (Local Plan, para 4.5), with 9,300 dwellings provided out of borough.

At the time of writing, there were around [9,000 households](#) awaiting housing on the council's register. It should be noted that a number of these are likely to have joined the register before 2018/19, or after 2021/22. Of these households, 62% would require two or more bedrooms (one or two adults with children, or multi-generational household).

### 2.10.2 Housing sites allocated in the Local Plan

#### Progress on sites allocated in Local Plan

Five local plan policies name specific sites for development or redevelopment. These are shown in the table below.

Table 13: Progress on Strategic Allocations (Housing) 2018/19-2021/22

Strategic Allocation	Site within allocation	Relevant permissions	Status as at 1 April 2022
Napier Park (LLP8)	Napier Park, Kimpton Road	13/00280/OUT; 16/01340/REM; 16/0900/FULEIA; 18/00562/AMEND	This site includes three separate developments: <ul style="list-style-type: none"> <li>Saxon Square (223 flats) – were all complete.</li> <li>Eaton Green Heights (297 dwellings) – 143 houses complete, the remainder were under construction</li> <li>Lu2on (Strawberry Star) (877 dwellings) – Building one (Union House – 562 dwellings) was under construction.</li> <li>See also Appendices 2 and 4.</li> </ul>

<b>Strategic Allocation</b>	<b>Site within allocation</b>	<b>Relevant permissions</b>	<b>Status as at 1 April 2022</b>
Power Court (LLP9)	Power Court	16/01400/OUTEIA; 20/01497/AMEND; 20/01587/OUTEIA	Outline permission in place for up to 1,200 dwellings, along with other developments, including new stadium. Not started. See also Appendices 2 and 4.
High Town (LLP10)	41-43 Dudley Street	16/00172/FUL	Development of 54 dwellings completed.
High Town (LLP10)	114-134 Midland Road	17/00115/FUL	Permission in place for conversion to 6 dwellings. Under construction at 1 April 2022.
High Town (LLP10)	142 - 144 Midland Road	07/01873/RENEW; 17/02167/FUL; 18/00061/FUL	Erection of 7/8 Storey block comprising 47 flats. Under construction at 1 April 2022.
High Town (LLP10)	104A Midland Road	18/01328/COM; 19/01073/COM; 20/00422/PALITR	Change of use from light industrial (B1(c) to dwellings (C3) 8 one bed flats. Under construction at 1 April 2022.
High Town (LLP10)	46 Old Bedford Road	18/01413/FUL	Conversion and change of use of and erection of two storey side extension to public house to comprise 4 flats and erection of 2 houses. Under construction at 1 April 2022.
High Town (LLP10)	98-100 Wenlock Street - Land And Buildings At & Behind	05/00077/OUT	Erection of 8 flats in three blocks and alterations to existing two bedroom flats. Partial development completed prior to 31/3/2018 (4 dwellings). Remainder had not commenced by 1 April 2022.
High Town (LLP10)	19 - 21 Burr Street	17/00821/OUT	Erection of 4 and 5 story building comprising 64 residential units approved. Subsequent applications made. Not started at 1 April 2022.
High Town (LLP10)	4 - 11 Burr Street	21/00306/FUL; 21/01494/AMEND 21/01726/MMAMD	Erection of four residential blocks, providing 320 flats. Not started, further amendments pending at 1 April 2022.
High Town (LLP10)	Land At 20 Charles Street	16/01279/FUL	Erection of 49 affordable dwellings -18 one and two bedroom apartments and 31 two, three and four bedroom houses. (100% affordable housing). Completed.
High Town (LLP10)	16 - 18 Taylor Street & 1-21 York Street	18/00457/FUL	Erection of two residential blocks comprising 16 flats. Completed.
High Town (LLP10)	Car Park Taylor Street	19/00925/FUL	Erection of 32 dwellings under construction at 1 April 2022.

<b>Strategic Allocation</b>	<b>Site within allocation</b>	<b>Relevant permissions</b>	<b>Status as at 1 April 2022</b>
Creative Quarter (LLP11)	2-12 Guildford street	21/01693/FUL	Erection of 177 flats approved. Not started at 1 April 2022.
Creative Quarter (LLP11)	Bute Street car park		No applications received at 1 April 2022.
Marsh Farm (LLP12)	Former Childrens Home, Buckle Close	15/01600/FUL; 19/00489/FUL; 20/00764/FUL	Erection of a 3/4 storey building comprising of 34 flats, along with the erection of an additional 1/2 storey building comprising three further flats. Not started at 1 April 2022.
Marsh Farm (LLP12)	Former Sherd Lodge, Sherd Close	15/01600/FUL; 18/00494/MMAMD	Refurbishment and conversion of the existing building and the erection of an additional 3 floors to create 50 flats. Completed.
Marsh Farm (LLP12)	Purley Centre, The Moakes	15/00785/FUL 16/01144/FUL; 17/01849/FUL; 18/01434/FUL	109 dwellings demolished and 118 new dwellings completed.

Of the above sites:

- One had no approved applications at 1 April 2022
- 1802 dwellings were approved but not started
- 815 dwellings were under construction
- 544 dwellings were completed during 2018/19-2021/22.

The Local Plan names 35 specific sites for housing, along with their potential capacity. These are:

- Guardian Industrial Estate
- Oxen Industrial Estate, Oxen Road
- Land at Caleb Close
- Car Parks on Dunstable Place
- Car Park off Telford Way
- Dalroad Industrial Estate
- 69 Felstead Way
- 14 Cardiff Road
- 27-37 Chapel Street
- 21-25 Chapel Street
- 13-31 Dunstable Road
- Land opposite Whitbread House, Flowers Way
- Luton Town Football Club, Kenilworth Road
- Midland House, 41 King Street
- Crescent House, 1-5 Latimer Road & The Windsor Castle, 12 Albert Road
- Land & buildings at Castle Street/ Oxford Road and Park Viaduct

- Land to the west of Newlands Road
- Land at Stockingstone Road
- The Laurels, Ely Way
- Westlea Old Peoples Home, 121 High Street
- 27A Upper George Street
- 40-58 Collingdon Street
- Car park adjacent to 95 Maple Road East
- Bramingham Centre, Weltmore Road
- 2 to 32 Beechwood Road
- 10 to 12 Caleb Close
- 146 to 158 Park Street
- Whitbread House, Flowers Way
- Land at the Orchard Centre, Strangers Way
- Unity House, 111 Stuart Street
- 38a Wingate Road
- 26-30 Cardiff Road
- Wesley House, 19 Chapel Street
- Britannia Estate

According to the Local Plan, these sites had the potential to deliver 2,225 dwellings.

Of the above sites,

- 8 had no approved applications at 1 April 2022
- 644 dwellings were approved but not started
- 506 dwellings were under construction
- 284 dwellings were completed before 2018
- 238 dwellings were completed during 2018/19-2021/22.

Appendix Three gives further details of progress in individual sites.

### 2.10.3 Housing delivery against target

Table 14 below shows that the net annual dwelling completions in Luton have exceeded the annual plan target in all years since 2015/16.

Table 14: Housing completions compared with the Luton Local Plan housing requirement

<b>Monitoring Year</b>	<b>Net gain in homes (HFR* submission)</b>	<b>Cumulative gain [A]</b>	<b>Cumulative annualised plan target [B]</b>	<b>Cumulative loss/gain against plan target [B-A]</b>
2011/12	490	490	425	65
2012/13	351	841	850	-9
2013/14	147	988	1,275	-287
2014/15	415	1,403	1,700	-297

Monitoring Year	Net gain in homes (HFR* submission)	Cumulative gain [A]	Cumulative annualised plan target [B]	Cumulative loss/gain against plan target [B-A]
2015/16	624	2,027	2,125	-98
2016/17	798	2,825	2,550	275
2017/18	873	3,698	2,975	723
2018/19	627	4,325	3,400	925
2019/20	791	5,116	3,825	1291
2020/21	474	5,590	4,250	1340
2021/22	412	6,002	4,675	1327

\* The Housing Flows Reconciliation is an annual return made to DLUHC. This return collects information on housing gains and losses and stock in the borough ('new build' completions, change of use, conversions, other gains and losses, and demolitions) and enables calculation of annual net additional dwellings for the local authority.

The annualised plan target is 425 dwellings per year. Over the period 2011/12-2021/22, this gives a target of 4,675 dwellings.

There was an under-delivery of homes between 2012/13 and 2014/15, however there was a surge in over delivery between 2015/16 and 2019/20 (where between 624 and 873 dwellings were delivered each year). Over the period 2011/12-2021/22, 6,002 net dwellings were added to the housing stock – an over delivery of 1,327 dwellings against the cumulative target.

#### 2.10.4 Housing delivery – all sites

Policy LLP15 requires that the size, type and tenure of dwellings provided reflects the identified housing need requirements of the area in the Strategic Housing Market Assessment (SHMA) 2015.

The SHMA was [updated](#) in December 2017, after the adoption of the Luton Local Plan. The following tables give the delivered housing mix between 2018 – 2022, measured against that set out in the 2017 SHMA. The percentages have been amended as Luton measures housing delivery of four or more bedrooms, rather than recording 4 and 5 bedroom units separately.

Table 15: Housing mix delivered 2018/19 (net)

Type	1 bed flat	2 bed flat	3+ bed flat	1 bed house	2 bed house	3 bed house	4+ bed house	Total Completions
Dwellings completed	267	160	11	0	57	62	70	627

Percentage of total dwellings completed	42.6%	25.5%	1.8%	0.0%	9.1%	9.9%	11.2%	100.0%
SHMA 2017 percentage	1%	-1% (All flats with 2 or more beds)	-1% (All flats with 2 or more beds)	0%	13%	70%	17%	100%

There is an over-delivery of 1-bed properties (42.6%) against identified need (1%). Whilst 87% of properties are required to be houses of 3 bedrooms or more, only 22.9% of those delivered actually are. This pattern is repeated in subsequent years.

Table 16: Housing mix delivered 2019/20 (net)

Type	1 bed flat	2 bed flat	3+ bed flat	1 bed house	2 bed house	3 bed house	4+ bed house	Total Completions
Dwellings completed	425	238	6	6	47	56	13	791
Percentage of total dwellings completed	53.7%	30.1%	0.8%	0.8%	5.9%	7.1%	1.6%	100.0%
SHMA 2017 percentage	1%	-1% (All flats with 2 or more beds)	-1% (All flats with 2 or more beds)	0%	13%	70%	17%	100%

Table 17: Housing mix delivered 2020/21 (net)

Type	1 bed flat	2 bed flat	3+ bed flat	1 bed house	2 bed house	3 bed house	4+ bed house	Total Completions
Dwellings completed	167	159	-1	1	13	75	60	474
Percentage of total dwellings completed	35.2%	33.5%	-0.2%	0.2%	2.7%	15.8%	12.7%	100.0%
SHMA 2017 percentage	1%	-1% (All flats with 2 or more beds)	-1% (All flats with 2 or more beds)	0%	13%	70%	17%	100%

Table 18: Housing mix delivered 2021/22 (net)

Type	1 bed flat	2 bed flat	3+ bed flat	1 bed house	2 bed house	3 bed house	4+ bed house	Total Completions
Dwellings completed	107	151	0	2	13	71	68	412
Percentage of total dwellings completed	26.0%	36.7%	0.0%	0.5%	3.2%	17.2%	16.5%	100.0%
SHMA 2017 percentage	1%	-1% (All flats with 2 or more beds)	-1% (All flats with 2 or more beds)	0%	13%	70%	17%	100%

Table 19: Total Housing mix delivered 2018/19-2021/22(net)

Type	1 bed flat	2 bed flat	3+ bed flat	1 bed house	2 bed house	3 bed house	4+ bed house	Total Completions
Dwellings completed 2018/19	267	160	11	0	57	62	70	627
Dwellings completed 2019/20	425	238	6	6	47	56	13	791
Dwellings completed 2020/21	167	159	-1	1	13	75	60	474
Dwellings completed 2021/22	107	151	0	2	13	71	68	412
<b>Total dwellings 2018/19-2021/22</b>	<b>966</b>	<b>708</b>	<b>16</b>	<b>9</b>	<b>130</b>	<b>264</b>	<b>211</b>	<b>2,304</b>
<b>Percentage of total dwellings completed</b>	<b>41.9%</b>	<b>30.7%</b>	<b>0.7%</b>	<b>0.4%</b>	<b>5.6%</b>	<b>11.5%</b>	<b>9.2%</b>	<b>100.0%</b>
SHMA 2017 percentage	1%	-1% (All flats with 2 or more beds)	-1% (All flats with 2 or more beds)	0%	13%	70%	17%	100%

Of the total dwellings delivered during the period, there has been an over-delivery of 1 bedroom units – 42.3% against the SHMA identified need of 1%. 82% of deliveries should be 2 or 3 bedroom properties, however the actual delivery has been 57.7%.

The SHMA-identified need is for houses, however they make up only 26.7% of dwellings delivered during the 201/19-2021/22 period.

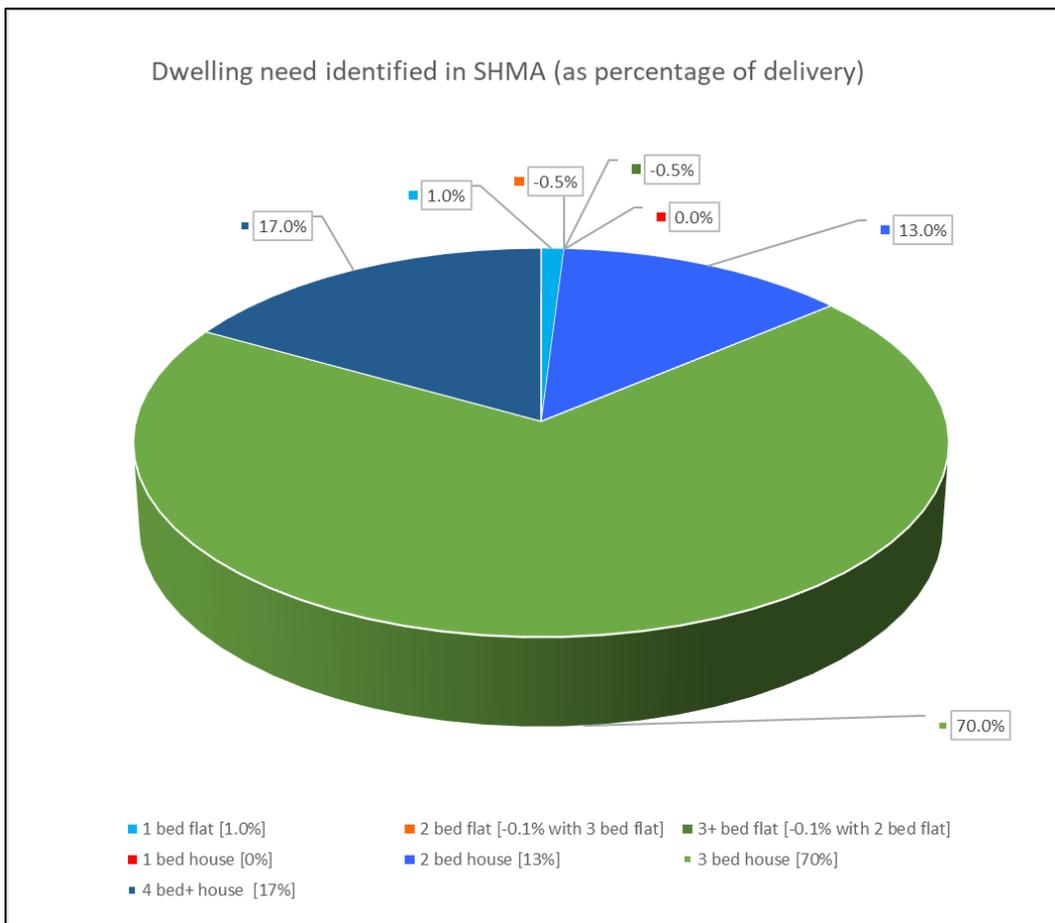


Figure 3: Dwelling need identified in SHMA (as percentage of delivery)

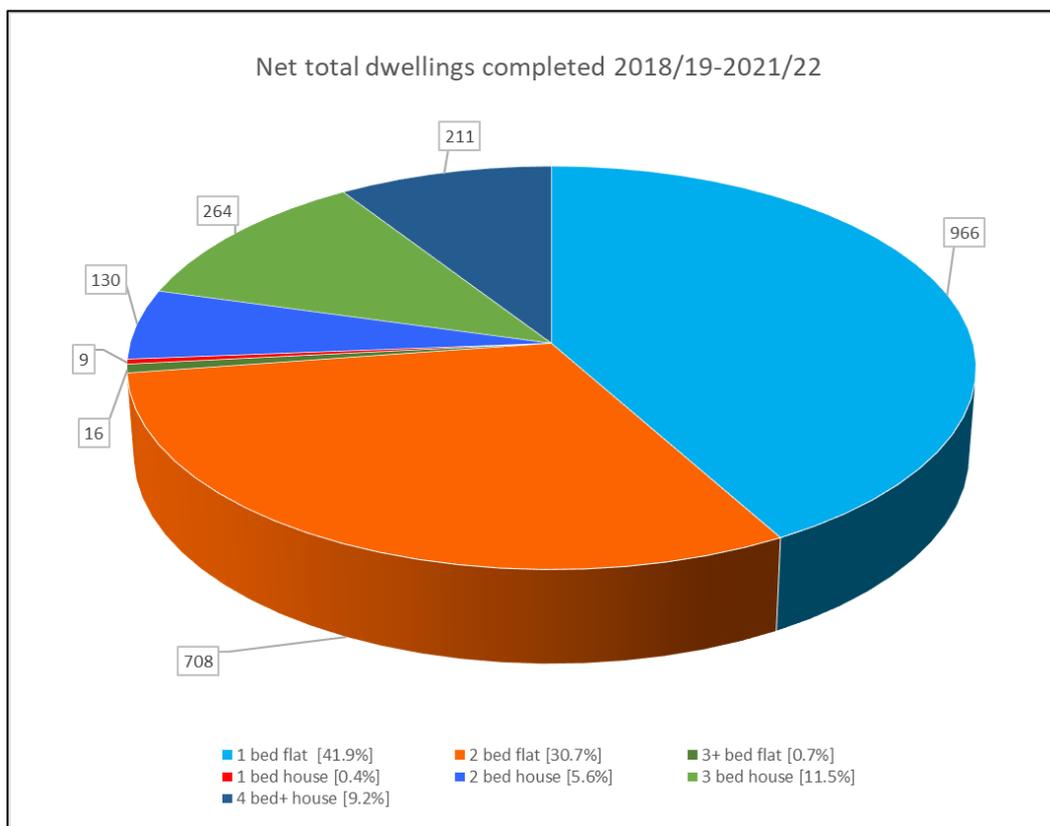


Figure 4: Dwellings completed 2018/19-2021/22

The pie charts in figures 3 and 4 illustrate the mismatch between requirement and delivery. Whilst there is no need (or a need for a reduction of) one and two bedroom flats (figure 3), the majority of homes delivered (72.6%) has been these dwellings.

### 2.10.5 Large windfalls

Windfall properties are those C3 dwellings developed on sites not allocated for housing.

Table 20: Net number of windfall dwellings delivered 2018/19-2021/22

Year	Total number of windfall dwellings delivered	Number of windfall dwellings delivered through permitted development	Number of windfall dwellings delivered on unoccupied land
2018/19	411	162	87
2019/20*	399	220	24
2020/21	160	28	15
2021/22	164	8	9
Total*	1134	418	135

\*includes a property subject to subsequent enforcement action.

There are falling numbers of windfall sites due to fewer permitted development office conversions. Over 10% of dwellings delivered were built on unoccupied land, including the gardens/amenity areas of existing properties.

The table above shows completions of units. At the end of the period, 861 windfall dwellings were under construction, and work onsite had not begun for another 635 dwellings.

Table 21: List of large windfall sites and gross number of dwellings delivered

Site name	Number of dwellings delivered	Type of development
400 Dallow Road*	130	Office to residential conversion
Laporte Way	111	Office to residential conversion
49-57 Castle Street	69	Redevelopment of brownfield site
26-34 Liverpool Road	59	Office to residential conversion
41-43 Dudley Street	54	Redevelopment of brownfield site
Moreton Park Estate	41	Redevelopment of brownfield site
48 Crawley Green Road	40	Redevelopment of brownfield site
Land at Clinton Avenue	36	New build
Roman Way	20	Redevelopment of brownfield site
Land Adj 139 to 213 Turnpike Drive	19	New build
Saints Community Centre	15	Redevelopment of brownfield site
64-66 Stuart Street	15	Office to residential conversion
46 London Road	14	Redevelopment of brownfield site
43 Ridgway Road	14	New build
32 King Street	13	Office to residential conversion
10 Cardiff Road	13	Office to residential conversion
2-6 Cardigan Street	11	Office to residential conversion
48 Crawley Green Road	11	Redevelopment of brownfield site
11 Farley Hill	10	Public house to residential conversion
36 Havelock Road	10	New build

\* unauthorised development subject to subsequent enforcement action.

705 units were delivered on large windfall sites:

- 352 through office to residential conversion
- 264 through the redevelopment of brownfield sites
- 79 new builds, and
- 10 through public house to residential conversion.

429 dwellings were delivered through smaller sites of nine units or fewer.

## 2.10.5 Gains of Housing from B Class employment sites

Section 2.9.6 describes the loss of employment land/floorspace to housing. This section details the housing these sites have delivered.

Table 22: C3 houses/bungalows gained from B class land/floorspace losses 2018/19-2021/22 – all sites

Year	1 bed dwelling	2 bed dwelling	3 bed dwelling	4+ bed dwelling	Total
2018-19	0	10	20	3	<b>33</b>
2019-20	0	0	0	0	<b>0</b>
2020-21	0	0	2	0	<b>2</b>
2021-22	0	1	0	0	<b>1</b>
<b>Total</b>	0	11	22	3	<b>36</b>
<b>% dwellings delivered</b>	0.0%	30.6%	61.1%	8.3%	<b>100.0%</b>

36 houses have been delivered on previously B use class sites, all of which are family-sized dwellings.

Table 23: C3 flats/studios gained from B class land/floorspace losses 2018/19-2021/22 – all sites

Year	Studio flat	1 bed flat	2 bed flat	3 bed flat	4+bed flat	Total
2018-19	77	182	66	3	0	<b>328</b>
2019-20	0	70	4	0	2	<b>76</b>
2020-21	10	23	9	0	0	<b>42</b>
2021-22	6	11	14	0	0	<b>31</b>
<b>Total</b>	93	286	93	3	2	<b>477</b>
<b>% dwellings delivered</b>	19.5%	60.0%	19.5%	0.6%	0.4%	<b>100.0%</b>

Whereas previous B use class sites have provided only 36 houses, 477 flats have been delivered during the period. Of these, 379 (79.5%) have been studio or one bed (1 or 2 person) flats, when identified need is for three bed dwellings.

Table 24: All C3 dwellings gained from B class losses by number of bedrooms 2018/19-2021/22 – all sites

Year	Studio	1 bed	2 bed	3 bed	4+bed	Total
2018-19	77	182	76	23	3	<b>361</b>
2019-20	0	70	4	0	2	<b>76</b>
2020-21	10	23	9	2	0	<b>44</b>
2021-22	6	11	14	0	0	<b>31</b>
<b>Total</b>	93	286	104	25	5	<b>513</b>
<b>% dwellings delivered</b>	18.1%	55.8%	20.3%	4.9%	1.0%	<b>100.0%</b>

Of the 513 dwellings delivered through the loss of B class uses, 379 units were studio or one bed flats – a total of 73.9% of all units.

### 2.10.6 Five year supply calculation

The five year supply position at 1 April 2022 was as follows:

Objectively Assessed Need (Local Plan)	8,500 dwellings
Annual requirement	425 dwellings
Number of years left in the Plan period	9 years
Total remaining requirement (425 dwellings x 9 years) [A]	3,825
Completions to date (2011/12 – 2021/22) [B]	6,002
Total surplus delivered [B-A]	1,327

At 1 April 2022, there had been an over-delivery of 1,327 dwellings. However, as described above, these tended to be smaller flats (ie 1 bedroom) rather than the required family homes. The figures for 2015-2019 also include a high number of properties delivered through permitted development – B1a (office) to C3 (residential) conversion.

The steps taken to arrive at a five year requirement for the period 1 April 2021 – 31 March 2026 are set out below.

*Note – figures rounded to the nearest whole number.*

Calculation	Result
8,500 minus 6,002	2,498 homes remaining
2,498 divided by 9 years remaining	278
278 multiplied by 5 years	1,390
1,464 plus 5% buffer	1,460

There is no evidence of ‘significant under delivery’ and therefore a 5% buffer has been applied. The five year requirement at 1 April 2022 has therefore been identified as 1,460 dwellings.

A full review of Luton’s 5 year housing land supply status will be undertaken during the upcoming Local Plan Review.

### 2.10.7 Housing Delivery Test

The Housing Delivery Test (HDT) is an annual measurement of housing delivery in the area of the relevant plan making authorities. The HDT is a percentage measurement of the number of net homes delivered against the number of homes required, as set out in the relevant strategic policies for the area, over a rolling three-year period.

The Housing Delivery Test Rule Book sets out how the measurement is calculated. Accompanying the measurement is a technical note illustrating the process followed in order to calculate the test measurement.

The HDT results are published annually by DLUHC (formerly MHCLG). The NPPF outlines a range of planning policy consequences for authorities who do not achieve set percentage results each year. Luton exceeded the set percentage results for the years 2018 to 2021, incurring no sanctions.

Due to the implementation of the first national lockdown in response to the Covid-19 pandemic, the Government reduced the 'homes required' within the 2019 to 2020 year in the HDT by a month in recognition of the temporary disruption to local planning services and the construction sector.

It is worth noting that if the full 12 months 'homes required' for Luton for 2019/20 had been used for the 2020 HDT, the result for Luton would still have incurred no repercussions.

### 2.10.8 Standard Test

The standard test was introduced in an update to the National Planning Policy Framework in July 2018, after the Luton Local Plan 2011-2031 was adopted, and is a different calculation of homes required. Whilst the Local Plan calculations are based on the results of the SHMA, Standard Test calculations are based on 2014 household projections produced by the government. The 10 year growth figures are:

Table 25: Standard Test 10 year growth figures

Period	From (households)	To (households)	Growth (households)	Annual household growth required over 10 years	House price to earnings ratio at start year
2022-23	87,724	98,886	11162	1116.2	8.84

The calculation is as follows:

Table 26: Calculation of Standard Test Adjustment Factor

Calculation	2022-32
Local affordability ratio:	8.84
Minus 4:	4.84
Divided by 4:	1.21
Multiply by 0.25:	0.3025
Add 1:	1.3025
<b>Adjustment factor:</b>	<b>1.3025</b>

Table 27: Calculation of minimum annual housing need figure

Calculation	2022-32
Average annual local housing need figure	1116.2
Adjustment factor:	1.3025
<b>Min. annual local housing need figure</b>	<b>1453.9</b>

Calculation	2022-32
LP adopted in 5 years or updated housing requirement figure for plan over 5 years?	No
Average annual local housing need figure	1116.2
Min. annual local housing need figure	1453.9

The cap is set at 40% above the higher of the most recent average annual housing requirement figure or household growth.

The capped figure is 2,035 dwellings (rounded).

The capped figure is greater than the minimum annual local housing need figure and therefore does not limit the increase to Luton’s minimum annual housing need figure.

The minimum figure for Luton is therefore 1,454 dwellings per year (rounded).

### 2.10.9 Affordable housing (Policy LLP16)

Policy LLP16 states “the Council will require the provision of 20% affordable housing units on developments that deliver a net gain of at least 11 dwellings and on sites of 10 dwellings or less that have a combined floorspace of more than 1,000sq.m.”

During the period 2018/19-2021/22, there were 494 housing completions which can be considered to be affordable homes that are in accordance with the Local Plan . 228 units were created through permitted development sites (all office to residential conversions), and therefore were not required to make an affordable housing provision.

Table 28: Affordable housing completions on eligible sites 2018/19-2021/22

Unit provision on eligible sites	Total units provided	Total affordable units provided	% of total units provided [1]
Total units provided on eligible sites	825	494	59.8%
- Of which Units provided through 100% AH developments	471	471	57.1%
- Of which Units provided in other developments	92	23	2.8%
- Of which, units provided in unviable developments	0	Units that could have been provided: 43	% of total that could have been provided: 5.2%

The eligible sites provided 825 homes, of which 494 were affordable dwellings. This suggests that affordable housing makes up 59.8% of the total numbers provided on eligible sites. However, during the period 2018/19-2021/22:

- Luton Council and others developed six sites of 100% affordable housing – totaling 471 dwellings.
- Other developments provided 92 homes, including 23 units of affordable housing, a rate of 2.8% against a council policy of 20%.
- The developers of two sites made contributions totaling £41,000 towards off-site affordable housing provisions, in lieu of providing on-site affordable dwellings. An affordable housing contribution is agreed with eligible developers during S106 discussions, and makes up part of the overall S106 payment.
- Eight eligible sites (totaling 127 units) provided no affordable housing following poor viability assessments.
- If a 20% affordable housing provision had been possible on-site at all ten sites which provided no on-site affordable housing, a further 43 affordable units could have been provided to the town.

One other site, too small for consideration against the affordable housing policy, but erecting 100% affording housing dwellings, provided 4 further affordable housing units.

#### 2.10.9.1 Number of developments (if any) providing off-site financial contributions.

The developers of two sites (which delivered 99 dwellings) contracted contributions totaling £41,000 towards off-site affordable housing provisions in their S106 agreement with the council. This was in lieu of 10 on-site affordable units.

Future affordable homes are secured as part of Section 106 agreements negotiated with developers of eligible sites. Section 2.4.1 shows the amounts of funding secured for, and spent on, affordable homes for this period. S106 payments include contributions towards education, parks, waste, and a number of other provisions as well as affordable housing.

The latest Luton Infrastructure Funding Statement 1 April 2021 to 31 March 2022 lists in Table 4b, the funding received from S106 agreements in 2020/21.

As an example of the affordable housing contribution on a development, see the applications for a different development - 40-58 Collingdon Street – on the following table.

Table 29: Example of affordable housing contribution on a development

Site address	Application number	Proposal	Total S106 funds received (incl for affordable housing) (20/21) (£)	Onsite affordable housing provision agreed in S106	Off-site affordable housing contribution agreed in S106 (£)
40-58 Collingdon Street	14/01369/FUL	Erection of a five storey residential development comprising 88 apartments...	216,178.34	None	210,000.00
40-58 Collingdon Street	18/01793/FUL	Creation of 15 additional residential flats...	134,000.00	1x 1 bed flat 2x 2 bed flats	0.00

Table 30: Affordable Housing Mix provided 2018/19

	1 bed flat	2 bed flat	3+ bed flat	2 bed house	3 bed house	4+ bed house	Total Completions
Dwellings completed	30	57	0	10	19	2	118
Percentage of total AH dwellings completed	25.4%	48.3%	0.0%	8.5%	16.1%	1.7%	100.0%
SHMA 2017 percentage	5.0%	18.0% (All flats with 2 or more beds)	18.0% (All flats with 2 or more beds)	16.0%	49.0%	12.0%	100.0%

Affordable housing provisions on developments are dependent on the properties being built. As has been shown previously, delivery of housing has been disproportionately skewed towards 1 and 2 bedroom flats. This is reflected in the affordable housing delivery figures, as can be shown above. While the overall need is for family sized accommodation, a quarter of properties delivered as affordable housing is 1 bed flats (against an identified need of 5%). Larger properties (3 or more beds) make up 17.8% of affordable homes delivered, against an identified need of 61%. This is reflected in subsequent years.

Table 31: Affordable Housing Mix provided 2019/20

	<b>1 bed flat</b>	<b>2 bed flat</b>	<b>3+ bed flat</b>	<b>2 bed house</b>	<b>3 bed house</b>	<b>4+ bed house</b>	<b>Total Completions</b>
Dwellings completed	26	71	3	15	15	7	137
Percentage of total AH dwellings completed	19.0%	51.8%	2.2%	10.9%	10.9%	5.1%	100.0%
SHMA 2017 percentage	5.0%	18.0% (All flats with 2 or more beds)	18.0% (All flats with 2 or more beds)	16.0%	49.0%	12.0%	100.0%

Table 32: Affordable Housing Mix provided 2020/21

	<b>1 bed flat</b>	<b>2 bed flat</b>	<b>3+ bed house</b>	<b>2 bed house</b>	<b>3 bed house</b>	<b>4+ bed house</b>	<b>Total Completions</b>
Dwellings completed	75	108	0	21	20	0	224
Percentage of total AH dwellings completed	33.5%	48.2%	0.0%	9.4%	8.9%	0.0%	100.0%
SHMA 2017 percentage	5.0%	18.0% (All flats with 2 or more beds)	18.0% (All flats with 2 or more beds)	16.0%	49.0%	12.0%	100.0%

Table 33: Affordable Housing Mix provided 2021/22

	<b>1 bed flat</b>	<b>2 bed flat</b>	<b>3+ bed house</b>	<b>2 bed house</b>	<b>3 bed house</b>	<b>4+ bed house</b>	<b>Total Completions</b>
Dwellings completed	3	9	0	3	0	0	15
Percentage of total AH dwellings completed	20.0%	60.0%	0.0%	20.0%	0.0%	0.0%	100.0%
SHMA 2017 percentage	5.0%	18.0% (All flats with 2 or more beds)	18.0% (All flats with 2 or more beds)	16.0%	49.0%	12.0%	100.0%

Table 34: Affordable Housing Mix provided 2018/22

	<b>1 bed flat</b>	<b>2 bed flat</b>	<b>3+ bed flat</b>	<b>2 bed house</b>	<b>3 bed house</b>	<b>4+ bed house</b>	<b>Total Completions</b>
Dwellings completed	134	245	3	49	54	9	494
Percentage of total AH dwellings completed	27.1%	49.6%	0.6%	9.9%	10.9%	1.8%	100.0%
SHMA 2017 percentage	5.0%	18.0% (All flats with 2 or more beds)	18.0% (All flats with 2 or more beds)	16.0%	49.0%	12.0%	100.0%

Over the period of this report, 494 affordable homes have been delivered:

- 27.1% as 1 bed flats (1 or 2 person) against a SHMA identified need of 5%
- 59.5% as 2 bed units
- 11.5% as 3 bed units
- 71% as 2 or 3 bed units against a SHMA identified need of 83%, but it should be noted 49.6% of the units delivered have been 2 bed flats, when the identified need is 49% as 3 bed houses.
- 1.8% are 4 or more bed houses against a SHMA identified need of 12%.

#### 2.10.10 Houses in Multiple Occupation (Policy LLP17)

It should be noted that under the Town and Country Planning (General Permitted Development) (England) Order 2015, C3 dwellings can be changed to C4 (6 person) Houses in Multiple Occupation (HMOs) without planning permission. This means that the Planning department will not record all conversions to or from C4 use, and this should be considered when reading this document.

Table 35: HMO gains

<b>HMO gains through change of use or extension</b>	<b>Total</b>
Change or extension to existing HMO (including from class C4 to sui generis)	16
Change of use from A4 (now sui generis) to HMO (class C4 or sui generis)	1
Change of use from B1a (now class E) to HMO (class C4 or sui generis)	3
Change of use from C1 to HMO (class C4 or sui generis)	5
Change of use from C2 to HMO (class C4 or sui generis)	2
Change of use from C3 to HMO (class C4 or sui generis)	16
Change of use from sui generis to HMO (class C4 or sui generis)	1
<b>Total approvals leading to gain of HMOs from other use classes:</b>	<b>29</b>

There was also one new build HMO completed during this period.

Table 36: HMO losses

<b>HMO losses through change of use</b>	<b>Total</b>
Change of use from HMO (class C4 or sui generis) to class C2	3
Change of use of part of HMO (class C4 or sui generis) to class C3	2
Change of use from HMO (class C4 or sui generis) to class C3	5
<b>Total approvals leading to the loss of all or part HMOs</b>	<b>10</b>

#### 2.10.11 Policy LLP17A - Student accommodation

There have been no applications for new purpose-built student accommodation (PBSA) during the period 2018/19-2021/22. A loft conversion at one site (see table 38) provided 3 individual units. However, a number of applications have been made for the change of use or conversion of PBSA to other use classes.

Table 38: Approvals regarding purpose built student accommodation 2018/19-2021/22

<u>Street Name</u>	<u>Student accommodation capacity lost/gained</u>	<u>Description (Proposal)</u>
Chapel Street	Up to 560 student units lost across Chapel, Dumfries and Park Street and Spring Place	20/00909/FUL: Change of use from student residential (Sui Generis) to student residential and co-living (Sui Generis).
Park Street	Up to 560 student units lost across Chapel, Dumfries and Park Street and Spring Place	20/00910/FUL: Change of use from student residential (Sui Generis) to student residential and co-living (Sui Generis), together with ancillary facilities.
Spring Place & Dumfries Street	Up to 560 student units lost across Chapel, Dumfries and Park Street and Spring Place	20/00908/FUL: Change of use from student residential (Sui Generis) to student residential and co-living with business/conferencing space (Sui Generis), together with ancillary facilities.
Manor Road	Up to 273 student units temporarily lost	20/00498/TEMP: Temporary change of use of the buildings from student accommodation to flexible hotel/student accommodation use.
Wellington Street	55 student units lost	21/00114/COU: Change of Use from Student Hostel Accommodation (Sui-Generis) formerly (C1) to Hostel (Sui Generis)
Guildford Street	Loss of 45 student units	19/00754/COU: Conversion and change of use from student accommodation to 45 bed HMO for temporary housing for 45 homeless people.
Guildford Street	Gain of 3 student units.	19/00248/FUL: Loft Conversion to create 3 additional units of student accommodation, with associated roof alterations and formation of new window openings and velux roof lights.

In total, up to 660 student residential accommodation units have been lost permanently, with another 273 units lost to another use temporarily. Only 3 student residential units have been gained in this period.

#### 2.10.12 Policy LLP18 – Older people’s housing

There have been no applications received, approved or completed for housing specifically designed for older people during this period.

### 2.10.13 Policy LLP10 – Gypsies, Travellers and Travelling Showpeople

There have been no applications received, approved, or completed relating to accommodation for Gypsy, Roma, Traveller or Travelling Showpeople during this period. See also 2.1.2.

### 2.10.14 Self and Custom Housebuilding Register

[National Planning Practice Guidance](#) defines self-build and custom housebuilding as "Self-build and custom housebuilding covers a wide spectrum, from projects where individuals are involved in building or managing the construction of their home from beginning to end, to projects where individuals commission their home, making key design and layout decisions, but the home is built ready for occupation ('turnkey')."

The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) provides a legal definition of self-build and custom housebuilding.

The [Housing Strategy 2022 - 2027](#) states "The council has responsibilities to maintain a Self-Build and Custom Build register and seek to enable serviced self-build plots. Although the number on the register is low, it has proved difficult to bring forward appropriate self-build serviced plots which meet the government definition. Our local plan does not include planning policy which could enforce the delivery of self-build plots.

### 2.10.15 Brownfield Land Register

Luton's [Brownfield land register](#) was last published in December 2019. It will be updated during the upcoming Local Plan Review.

# References

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- Luton Council – Luton Council Corporate Plan 2021-2023 ([https://m.luton.gov.uk/Page/Show/Council\\_government\\_and\\_democracy/Councils/Council\\_strategies\\_and\\_plans/Pages/Corporate%20Plan.aspx](https://m.luton.gov.uk/Page/Show/Council_government_and_democracy/Councils/Council_strategies_and_plans/Pages/Corporate%20Plan.aspx))
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- Luton Council – Luton Local Plan 2011-2031 (<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/adoption/Luton-Local-Plan-2011-2031-November-2017.pdf>)
- Luton Council & Avison Young – Luton Article 4 Direction – Employment Report (<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Article-4-employment-report.pdf>)
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- National Infrastructure Commission: Partnering for Prosperity – A new deal for the Cambridge-Milton Keynes-Oxford Arc (<https://nic.org.uk/app/uploads/Partnering-for-Prosperty-Report.pdf>)

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- Simple Guide to Strategic Planning and the Duty to Cooperate (<https://www.local.gov.uk/sites/default/files/documents/simple-guide-strategic-pl-557.pdf>)

## Appendix One: Legislation and national policy changes between 2018 and 2022

Year	Month	Title	Details
2017	16/4/17	<a href="#">Town and Country Planning (Brownfield Land Register) Regulations 2017</a>	The Town and Country Planning (Brownfield Land Register) Regulations 2017, which placed “a duty on those local planning authorities which have responsibility for housing development in their area, ... to prepare, publish and maintain a register of previously developed land (known commonly as “brownfield land”) which is suitable for residential development” It also made “provision in relation to the new planning consent route known as ‘permission in principle’ – in particular in relation to permission in principle granted when land is allocated in a register under section 14A of the Planning and Compulsory Purchase Act 2004 (“brownfield land register”)”.
2017	27/4/17	<a href="#">Neighbourhood Planning Act 2017</a>	Ensuring that planning decision-makers take account of well-advanced neighbourhood development plans; requiring parish councils and designated neighbourhood forums to be automatically notified of future planning applications in their area; and, by giving neighbourhood development plans full legal effect at an earlier stage. It introduced a proportionate process for modifying neighbourhood development orders and plans and facilitates the modification of neighbourhood areas where a neighbourhood development order or plan has already been made in relation to that area. The Act also made the duty on local planning authorities to support neighbourhood planning groups and the neighbourhood planning examination process more transparent.
2018	24/7/18	<a href="#">National Planning Policy Framework (NPPF)</a>	The <a href="#">NPPF</a> was revised.
2018	November	<a href="#">Raynsford Review of Planning in England</a>	The <a href="#">Review</a> was published by the TCPA. It concluded that “There are big problems with our current planning system, but equally there is a major opportunity to reimagine the system so that it can help make people’s lives better by driving effective change.” And that “change of a lasting and fundamental nature” was required (p117).
2019	19/2/19	<a href="#">National Planning Policy Framework</a>	An updated NPPF published. It updated <a href="#">guidance</a> on <a href="#">housing need assessment</a> and clarify <a href="#">policy</a> on; <a href="#">housing land supply</a> , the definition of ' <a href="#">deliverable</a> ' and appropriate <a href="#">assessment</a> . A minor revision was made in June 2019.

Year	Month	Title	Details
2019	October	<a href="#">National Design Guide</a>	The <a href="#">Guide</a> was first published in October 2019, and revised in 2021. It sets out the characteristics of well-designed places and demonstrates what good design means in practice, forming part of the government's collection of planning practice guidance. Design parameters to help local authorities and communities decide what good quality design looks like in their area can be found in the <a href="#">National Model Design Guide</a> , published in 2021 alongside a revision to the National Design Guide.
2019		<a href="#">The Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019</a>	This <a href="#">Amendment</a> introduced Infrastructure Funding Statements, requiring local authorities to report on developer contributions received and allocated through the Community Infrastructure Levy and Section 106 agreements.
2020	6/8/20	<a href="#">Planning for the Future</a>	The white paper proposed that: <ul style="list-style-type: none"> <li>• Local communities will be consulted from the very beginning of the planning process. By harnessing the latest technology through online maps and data, the whole system will be made more accessible</li> <li>• Valued green spaces will be protected for future generations by allowing for more building on brownfield land and all new streets to be tree lined</li> <li>• Much-needed homes will be built quicker by ensuring local housing plans are developed and agreed in 30 months – down from the current 7 years</li> <li>• Every area to have a local plan in place – currently only 50% of local areas has a plan to build more homes</li> <li>• The planning process to be overhauled and replaced with a clearer, rules based system. Currently around a third of planning cases that go to appeal are overturned at appeal</li> <li>• A new simpler national levy to replace the current system of developer contributions which often causes delay</li> <li>• The creation of a fast-track system for beautiful buildings and establishing local design guidance for developers to build and preserve beautiful communities</li> <li>• All new homes to be 'zero carbon ready', with no new homes delivered under the new system needed to be retrofitted as we achieve our commitment to net zero carbon emissions by 2050</li> </ul>
2020	22/7/20	<a href="#">Business and Planning Act 2020</a>	The <a href="#">Act</a> was brought in to help businesses with new ways of working during and recovering from the pandemic. In relation to Planning, its objectives were to <ol style="list-style-type: none"> <li>a. Making it easier for premises in England serving food and drink such as bars, restaurants and pubs to seat and serve customers outdoors through temporary changes to highway</li> </ol>

Year	Month	Title	Details
			<p>licensing procedures and alcohol licensing. Alcohol licensing changes will allow operators to serve alcohol for consumption off the premises and will also apply in Wales.</p> <p>b. Making temporary changes to the law relating to planning in England, as well as new, permanent provision for certain planning proceedings in England to be considered by means of more than one procedure. This will ensure that the planning system can continue to operate effectively and support the planning and safe construction of new development following the impact of Covid-19.</p>
2020	Effective from 1/8/20	<a href="#">Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020</a>	<p>The core changes include the recalibration of the classification of uses of property. Classes A, B1 and D1, applicable to retail, office and non-residential institutions and assembly and leisure uses respectively, are removed and new use classes introduced in their place. The new Class E encompasses commercial, business and service, while the new F.1 and F.2 apply to learning and non-residential institutions and local community use respectively.</p> <p>In addition, some uses which were previously given their own use class have been moved into the 'sui generis' category, meaning they will from now belong to no specific class. Changes to and from these uses will be subject to full local consideration through the planning application process.</p> <p>The residential (C classes), general industrial (B2) and storage and distribution (B8) use classes remain unchanged, except for a new cross reference in the B2 class to the new Class E 'commercial' use class.</p> <p>For an explanation of use classes, and summary of the specific changes, please see the <a href="#">Planning Portal</a>.</p>
2020	16/12/20	Amendment to <a href="#">standard method for calculating housing need</a>	<p>The Government instead amended the current standard method by adding a 35 per cent uplift to the post-cap number which it generates for Greater London and the local authorities containing the largest proportion of the other 19 most populated cities and urban centres in England ...</p> <p>The PPG on housing and economic needs assessment was updated on 16 December 2020 and now includes the uplift as step 4 of the assessment of housing need. The Government has published figures for indicative local housing need, using the updated methodology.</p>
2021	2/2/21	<a href="#">Levelling Up white paper</a>	<p>The <a href="#">Levelling Up white paper</a> was published on 2 February 2021. One of the Government's stated aims in the white paper is to "improve pride in place in every area of the UK, with the gap between top performing and other areas narrowing". Some of the white paper's proposals relate to planning.</p>

Year	Month	Title	Details
			In a <a href="#">statement to the House of Commons</a> on 2 February 2022, the Secretary of State for Levelling Up, Michael Gove, outlined its planning and regeneration measures. Many of the Levelling Up white paper's provisions – such as those for encouraging the use of brownfield land and promoting beauty and good design – were foreshadowed in the white paper Planning for the Future.
2021	Effective from 21/4/21	<a href="#">Town and Country Planning (General Permitted Development etc.) (England) (Amendment) order 2021</a>	<p>New permitted development right to change use from the Commercial, Business and Service use class to residential use.</p> <p>The right is subject to prior approval by the local planning authority in respect of: flooding; transport impacts of the development, particularly to ensure safe site access; contamination, impacts of noise from existing commercial premises; adequate natural light in all habitable rooms; the impact of the loss of ground floor Commercial, Business and Service use on the character and sustainability of a conservation area; impact on future residents from introduction of residential use in an area the authority considers is important for heavy industry, waste management, storage and distribution, or a mix of such uses; and impact of the loss of health centres and registered children's nurseries on the provision of local services.</p> <p>The Class MA right provides for the change of use from any use within the Commercial, Business and Service use class (E) to residential (class C3) use.</p> <p>This legislation prevents applications for prior approval for the existing right for the change of use from office to residential (Class O) and in respect of A1 (shops), and A2 (financial and professional services) under Class M (retail, takeaways and specified sui generis uses to dwellinghouses) being made after 31 July 2021.</p> <p>Where there is an existing Article 4 direction on 31 July 2021 in respect of the change of use from offices to residential (under Class O) it will continue to have effect on equivalent development in respect of offices (now under use class E (g) (i)) under Class MA until 31 July 2022.</p>
2021	20/7/21	<a href="#">National Model Design Code</a>	The <a href="#">Code</a> was published to support the <a href="#">National Design Guide</a> , providing design parameters to help local authorities and communities decide what good quality design looks like in their area.

Year	Month	Title	Details
2021	20/7/21	<a href="#">National Planning Policy Framework</a>	The National Planning Policy Framework was revised. It: <ul style="list-style-type: none"> <li>• required Article 4 directions to be targeted, fully justified, restricted to the smallest geographical area possible and robustly evidenced;</li> <li>• updated measures to ensure fire safety matters were incorporated at the planning stage for schemes involving a relevant high-rise residential building;</li> <li>• included additional wording to encourage sustainable developments and the protection of the environment.</li> </ul>
2021	9/11/21	<a href="#">Environment Act 2021</a>	The <a href="#">Act</a> “comprises two thematic halves. The first provides a legal framework for environmental governance. The second makes provision for specific improvement of the environment, including measures on waste and resource efficiency, air quality and environmental recall, water, nature and biodiversity, and conservation covenants”. It sets out the key components of mandatory biodiversity gain, such as the biodiversity metric, and Local Nature Recovery Strategies.
2022	May	<a href="#">Levelling-up and Regeneration Bill introduced to t Parliament (House of Commons)</a>	<a href="#">Described as</a> “A Bill to make provision for the setting of levelling-up missions and reporting on progress in delivering them; about local democracy; about town and country planning; about Community Infrastructure Levy; about the imposition of Infrastructure Levy; about Environmental Outcome Reports for certain consents and plans; about regeneration; about the compulsory purchase of land; about information and records relating to land, the environment or heritage; for the provision for pavement licences to be permanent; about governance of the Royal Institution of Chartered Surveyors; about vagrancy and begging; and for connected purposes.” This bill will also abolish the duty to cooperate, with it being replaced with an alignment policy.

## Appendix Two: Monitoring spreadsheet - Policy LLP2 (B). employment sites

### Status of Key Employment Area sites: Category A

Site Name	Gross area of allocation (Ha)	Status as at 1 April 2022
Butterfield Green Technology Park	37.3 ha	See Table 10. Previously greenfield site.
Junction 10a South of Stockwood Park [Newlands Park]	14 ha (appn says 16.2)	See Table 10. Previously greenfield site.
Napier Park	25 ha	Napier Park, although listed as a Category A employment site, is also designated in LLP8 as suitable for both employment and housing (mixed use) and therefore there is no loss of employment land to housing. See Tables 10 and 13 and Appendix Four for further information.
Wigmore Employment Area/ Century Park	42.6 ha	See Table 10.
Power Court	7.21 ha	Power Court, although listed as a Category A employment site, is also designated in LLP8 as suitable for both employment and housing (mixed use) and therefore there is no loss of employment land to housing. See Tables 10 and 13, and Appendix Four for further information.
Airport Executive Park	3.7 ha	No applications.
Barratts Industrial Park	3.5 ha	No current permissions, or completions as at 1 April 22. B1, B2, B8, D2 uses remain
Bilton Way	9.6 ha	No current permissions, or completions as at 1 April 22. B1 (now E) /B2 B8 uses remain.
Bramingham Business Park	2 ha	No current permissions, or completions as at 1 April 22. Mixed uses remain.
Camford Way	10.3 ha	No current permissions, or completions as at 1 April 22. Mixed uses remain.
Capability Green	27.5 ha	No current permissions, or completions as at 1 April 22.
Chapel Street (CASTLE QUARTER)	0.19 ha	17/02017/COM; 18/01244/FUL: 15-17 George Street is being converted to A3/B1a/c (E) use on ground floor, with 72 studio flats above. B1a use lost.
Commerce Park	3.6 ha	No current permissions, or completions as at 1 April 22.

Site Name	Gross area of allocation (Ha)	Status as at 1 April 2022
Cosgrove Way	10.1 ha	No current permissions, or completions as at 1 April 22.
Cradock Road	5.0 ha	No current permissions, or completions as at 1 April 22.
Crescent Road	2.1 ha	No current permissions, or completions as at 1 April 22.
Dalroad Employment Area	5.7 ha	No current permissions, or completions as at 1 April 22.
Dencora Way Employment Area	1.8 ha	No current permissions, or completions as at 1 April 22.
Electrolux Oakley	2.2 ha	No current permissions, or completions as at 1 April 22.
Finway Industrial Estate	6.8 ha	No current permissions, or completions as at 1 April 22. Mixed uses remain.
Firbank Industrial Estate	3.24 ha	19/00882/FUL: A development of 13 new industrial/distribution units (Classes B1c (now E), B2, and B8 was completed in August 2021.
Guildford Street - Hat Factory and Alexon Building	0.15 ha	Both buildings converted from B class uses to Arts Centre and Education building before Local Plan adopted
Inkerman Street	0.55 ha	No current permissions, or completions as at 1 April 22. Mixed uses remain.
Jansel House	0.6 ha	No current permissions, or completions as at 1 April 22. B1a (now E) use remains.
Kimpton Road A (Hayward Tyler)	3.04 ha	20/00147/OUT: Outline application submitted for redevelopment of site to provide up to 1,000 housing units, along with flexible commercial and community use floorspace. Mixed B class uses will be lost when development implemented.
Kimpton Road B (Express Newspapers & Hart House)	1.5 ha	18/000271/EIA; 21/01082/FUL: Stirling Place/Bartlett Square site. Site clearance underway. To be built out in phases, starting with station access.
Kimpton Road C (Vauxhall factory)	15.71 ha	No current permissions, or completions as at 1 April 22. Mixed B class uses remain.
Kingsway Industrial Estate	1.11 ha	No current permissions, or completions as at 1 April 22.
Osbourne Road Employment Area [Prologis Park]	7.0 ha	No current permissions, or completions as at 1 April 22. 22/01334/HYBEIA: application for full site pending. Mixed use classes will remain.
Laporte Way	13.6 ha	16/01226/COM: Request for Prior Approval - Change of use under Class O - from offices (use class B1(a)) to 111 residential units (use class C3), comprising of 83 residential units within Randstad Court (all floors) and 28 residential units within Randstad Court South (all floors). B1a use lost.
Liverpool Road	0.96 ha	18/01146/COM & 19/00274/AMEND: Conversion of 26-34 Liverpool Street to dwellings completed. B1a (now E) use lost. 17/00761/COM: expired so B1a (now E) use remains.
Luton Enterprise Park	2.9 ha	No current permissions, or completions as at 1 April 22.

Site Name	Gross area of allocation (Ha)	Status as at 1 April 2022
Park Avenue Trading Estate	5 ha	No current permissions, or completions as at 1 April 22. B1c (now E) use remains.
Percival Way Industrial Area	6.3 ha	20/00337/DEMCON: Proposed demolition of 2 office buildings (B1a now E class) at 94 and 95 Percival Way.
Plaza 668	0.35 ha	No current permissions, or completions as at 1 April 22.
Portland Road (Depot)	4.36 ha	21/00409/DEMCON: Proposed demolition of Portland House. 21/00426/FUL: erection of an electricity sub station.
Premier Business Park	1.6 ha	No current permissions, or completions as at 1 April 22. Mixed uses remain.
Proctor Way	1.8 ha	17/00855/COM (PP); 17/00857/COM (CC); 17/02026/FUL (PP); 18/00062/FUL (CC); 19/01678/COM (CC); 20/00020/COM (PP); 20/01401/FUL (PP&CC): Proposed conversions of Prudence Place (PP) and Charlotte's Court (CC) from B1a (E) use to residential units under permitted development, with loss of B1a (now E) uses.
Progress Park	0.70 ha	No current permissions, or completions as at 1 April 22.
Prospect Way	6.2 ha	No current permissions, or completions as at 1 April 22.
Scott Road	2.6 ha	19/01371/FUL: permission given for change of use of 31 Scott Road from B8 to D1 (now class E) use.
Sedgwick Road/Progress Way	13.6 ha	No current permissions, or completions as at 31/3/221 April 22. B2 use remains
SKF	8.14 ha	18/00280/OUT: permission in place for development of land on part of the site for industrial building.
Selbourne Road Industrial Area	4.17 ha	Five new industrial units have been built at 227-231 Selbourne Road, following demolition of previous buildings. 19/00888/FUL and 20/00028/FUL are not started. Mixed B class uses remain.
Sundon Business Park	2.6 ha	No current permissions, or completions as at 31/3/221 April 22.
Sundon Industrial Estate	2.5 ha	No current permissions, or completions as at 31/3/221 April 22.
Urban HIVE, Luton Enterprise Park	0.81 ha	No current permissions, or completions as at 31/3/221 April 22.
Vauxhall North of Napier Park	11.26 ha	No current permissions, or completions as at 31/3/221 April 22.
Vauxhall Way Trailer Park	14.57 ha	22/01058/FUL: change of use from B2 to B2/SG use is pending consideration.
Waller Avenue	2.61 ha	No current permissions, or completions as at 1 April 22. Subsequent application made for a major development including dwellings and employment/commercial space.
Wigmore Place	1.8 ha	No current permissions, or completions as at 1 April 22.
Wingate Road	1.16 ha	Plots 1 and 3: No current permissions, or completions as at 31/3/22. Plot 2 redeveloped under 16/00313/OUT and 18/00823/REM, providing 16 dwellings on Arundel Road and Wingate Road with loss of B class uses.
Willowgate Trading Estate	2.3 ha	No current permissions, or completions as at 31/3/22.

## Status of Key Employment Area sites: Category B

Site Name	Gross area of allocation (Ha)	Notes
Abbeygate Business Centre	0.2 ha	No current permissions, or completions as at 1 April 22. B1 (now E) use remains.
Albion Road	0.2 ha	22/00726/PACOM: 29 Albion Rd to be converted to mostly C3 residential use. Some other buildings in this area have also been converted to residential, with Albion House, 21-27 and 29 Albion road remaining in B class uses.
Arundel Road	0.95 ha	No current permissions, or completions as at 1 April 22. NB this is not the same site as described in 'Wingate Road' in the Category A list.
Brunswick Street (HIGH TOWN MASTERPLAN)	0.32 ha	No current permissions, or completions as at 1 April 22.
Burr Street (HIGH TOWN MASTERPLAN)	0.8 ha	Approved schemes for redevelopment of 4-11 Burr Street to provide 320 dwellings (20/00567/FUL; 22/00807/MMAMD), 19-21 Burr Street to provide 64 dwellings (20/00132/REM), and 10 Midland Road (21/01782/FUL) to provide 227 dwellings. Application submitted for redevelopment of 17 Hitchin Road to provide 19 dwellings (19/01363/FUL). Loss of B1 (now E), B2 and B8 uses at all sites.
Bus Depot Dunstable Road	3.18 ha	No current permissions, or completions as at 1 April 22.
Crescent Road (East)	2.8 ha	No current permissions, or completions as at 1 April 22.
Dudley Street (HIGH TOWN MASTERPLAN)	0.3 ha	No current permissions, or completions as at 1 April 22. Currently in use as an informal car park.
Eaton Green Road	2.3 ha	No current permissions, or completions as at 1 April 22.
Empress Road	0.1 ha	Site previously redeveloped for housing, with loss of B class uses.
Castle Quarter (CASTLE QUARTER)	1.38 ha	Two sites previously developed. 20/00281/FUL: Permitted scheme at former Honda site for redevelopment providing 154 dwellings.
Chaul End Lane (South)	0.6 ha	Site previously changed to D2 use.
Collingdon Street & Liverpool Road	0.58 ha	Liverpool Road status is covered in Table 21, and in the previous table giving the status of Category A sites. 60-64 Collingdon Street has application 19/01159/FUL pending for a mixed use (B1 commercial/28 dwellings) development. 90-100 Collingdon street has permission 19/00851/COM for the upper floors to be converted to flats. 102 Collingdon Street is being extended and altered to provide 18 dwellings (18/00616/FUL). Mixed B/E class uses will be lost on all sites unless otherwise stated.

<b>Site Name</b>	<b>Gross area of allocation (Ha)</b>	<b>Notes</b>
Concorde Street (HIGH TOWN MASTERPLAN)	0.1 ha	No current permissions, or completions as at 1 April 22.
Crescent Road (East)	0.8 ha	No current permissions, or completions as at 1 April 22.
Cumberland Street (CASTLE QUARTER)	0.29 ha	Applications 17/01764/FUL, 20/00202/AMEND and 20/00222/MMAMD have been approved for 1-11 Cumberland Street) for residential/commercial development providing 246 dwellings. Previous B class uses lost when site was cleared.
Flowers Estate	0.28 ha	No current permissions, or completions as at 1 April 22.
Frederick Street	0.24 ha	No current permissions, or completions as at 1 April 22.
Gillam Street (HIGH TOWN MASTERPLAN)	0.1 ha	Site previously redeveloped as dwellings (Gillam Court).
Greenwood Court Industrial Area	0.42 ha	No current permissions, or completions as at 1 April 22.
High Town Road	0.5 ha	No current permissions, or completions as at 1 April 22.
Hitchin Road	0.04 ha	No current permissions, or completions as at 1 April 22.
Holly Street	0.67 ha	No current permissions, or completions as at 1 April 22.
King Street	0.66 ha	32 King Street converted to 13 flats (14/01548/COM)
Leagrave Road	3.34 ha	117 Leagrave Road has changed use from B2 to sui generis use (18/01235/COU). No other applications or completions as at 1 April 22.
Langley Terrace	0.72 ha	No current permissions, or completions as at 1 April 22.
Manor Road	1.6 ha	Appeal decision APP/B0230/W/21/3275436 (20/00696/FUL) permitted the redevelopment of site to provide office suites and 10 dwellings at 2-12 Bolton Road. B2 use to be lost. Permission 17/00817/OUT (39-49 Manor Road) enables the site to be redeveloped to provide 105 residential units along with mixed use commercial units (B1a, B1b and/or B1c – now Class E).
Mill Street	0.08 ha	Site (2-4 Mill Street) converted to hotel (19/00465/FUL). Previous D1 use lost.
Moreton Park	0.9 ha	Site redeveloped to provide 41 dwellings (18/00159/FUL) as 'Magnolia Place'. All mixed B class uses lost.
141 New Bedford Road	0.42 ha	No current permissions, or completions as at 1 April 22. Mixed uses lost.
New Town Trading Estate	0.43 ha	No current permissions, or completions as at 1 April 22.
Sarum Road	0.15 ha	Site is undergoing conversion to a mosque (17/01895/COU). B1c (now E) use lost.
Sunrise Estate	0.3 ha	No current permissions, or completions as at 1 April 22. Mixed uses remain.

<b>Site Name</b>	<b>Gross area of allocation (Ha)</b>	<b>Notes</b>
Taylor Street (1) (HIGH TOWN MASTERPLAN)	0.2 ha	No current permissions, or completions as at 1 April 22. B8 use remains.
Taylor Street (2) (HIGH TOWN MASTERPLAN)	0.1 ha	No current permissions, or completions as at 1 April 22. B8 use remains.
Telmere Estate	0.43 ha	Unit 7 has changed use from B8 to D1 (now Class E) (17/01621/COU). Unit 3b has changed use from B1c (now Class E) to sui generis (17/02072/COU). All other B class uses remain on the estate.
York Street (1) (HIGH TOWN MASTERPLAN)	0.3 ha	No current permissions, or completions as at 1 April 22.
York Street (2) (HIGH TOWN MASTERPLAN)	0.1 ha	Permission for conversion and change of use of 17-19 Taylor Street (19/00951/FUL) allows it to change from B8 use to D1/2 (now F1/sui generis).

## Appendix Three: Monitoring spreadsheet - Policy LLP15 Housing Allocations

### Status of Housing Allocations (as listed in Luton Local Plan Appendix 4) and potential capacity for dwellings

Site Name	Potential Capacity (no. homes)	Site developed prior to adoption?	SHLAA ref	Current status (as at 1 April 22)	Major development?	Potential capacity for sites with no appl'ns	Homes applied for	<u>Homes not started</u>	<u>Homes under construction</u>	<u>Homes complete before 31/3/18</u>	<u>Homes complete 1/4/18-1/4/22</u>
Guardian Industrial Estate	77	y*	N/A	Developed prior to 31/3/2018. (74 dwellings)	y					74	
Oxen Industrial Estate, Oxen Road	48	n	161	No current applications for housing.		48					
Land at Caleb Close	181	n	208	17/01040/FUL: 224 dwellings completed	y						224
Car Parks on Dunstable Place	41	n	175	20/01608/FUL: Application for development of 194 dwellings pending consideration.	y		194				
Car Park off Telford Way	39	n	N/A	No current applications for housing.		39					

Site Name	Potential Capacity (no. homes)	Site developed prior to adoption?	SHLAA ref	Current status (as at 1 April 22)	Major development?	Potential capacity for sites with no appl'ns	Homes applied for	Homes not started	Homes under construction	Homes complete before 31/3/18	Homes complete 1/4/18-1/4/22
Dalroad Industrial Estate	32	n	180	18/01833/FUL: Permission in place for construction of 186 residential units.	y			186			
69 Felstead Way	59	n	182	06/00744/REM; 07/00279/REM: Permission in place for 22 houses and 26 flats. 14 houses built. Site appears stalled.	y			34			14
14 Cardiff Road	0	y	N/A	Developed prior to 31/3/2018. (57 dwellings)	y					57	
27-37 Chapel Street	30	n	199	17/00449/FUL: Permission in place for development of 43 dwellings.	Y			43			
21-25 Chapel Street	39	n	N/A	20/00909/FUL: Site previously developed for student accommodation . Now in use as joint student/ co-living accommodation .							

Site Name	Potential Capacity (no. homes)	Site developed prior to adoption?	SHLAA ref	Current status (as at 1 April 22)	Major development?	Potential capacity for sites with no appl'ns	Homes applied for	Homes not started	Homes under construction	Homes complete before 31/3/18	Homes complete <u>1/4/18-1/4/22</u>
13-31 Dunstable Road	124	n	208	No current applications for housing.	y	124					
Land opposite Whitbread House, Flowers Way	168	n	210	22/00195/FUL: Application for development of 380 dwellings pending consideration.	y		380				
Luton Town Football Club, Kenilworth Road	59	n	220	No current applications for housing.		59					
Midland House, 41 King Street	0	y	n/a	Developed prior to 31/3/2018 - hostel.						0	
Crescent House, 1-5 Latimer Road & The Windsor Castle, 12 Albert Road	80	n	222	16/01102/FUL; 20/00581/AMEND: Permission in place for development of 238 dwellings.	y			238			
Land & buildings at Castle Street/ Oxford Road and Park Viaduct	0	n	n/a	18/01294/FUL: Development of 67 flats underway	y		67		67	0	0

Site Name	Potential Capacity (no. homes)	Site developed prior to adoption?	SHLAA ref	Current status (as at 1 April 22)	Major development?	Potential capacity for sites with no appl'ns	Homes applied for	Homes not started	Homes under construction	Homes complete before 31/3/18	Homes complete <u>1/4/18-1/4/22</u>
Land to the west of Newlands Road	392	n	337*	17/00590/FUL; 20/01019/MMAMD: Development of 340 dwellings underway	y				34		
Land at Stockingstone Road	56	n	339	No current applications for housing.		56					
The Laurels, Ely Way	14	n	n/a	Part of site developed prior to 31/3/2018, no current applications for the remainder.		0				1	
Westlea Old Peoples Home, 121 High Street	0	y	n/a	Developed prior to 31/3/2018. (67 dwellings)	y					67	
27A Upper George Street	26	n	351	17/01004/FUL; 21/01619/AMEND: Permission in place for development of 46 dwellings.							

Site Name	Potential Capacity (no. homes)	Site developed prior to adoption?	SHLAA ref	Current status (as at 1/4/22)	Major development?	Potential capacity for sites with no appl'ns	Homes applied for	Homes not started	Homes under construction	Homes complete before 31/3/18	<u>Homes complete 1/4/18-1/4/22</u>
40-58 Collingdon Street	88	n	352	14/01369/FUL; 18/01793/FUL: Development of 103 dwellings underway	y				103		
Car park adjacent to 95 Maple Road East	49	n	353	No current applications for housing.		49					
Bramingham Centre, Weltmore Road	51	n	359	Development of 63 dwellings under way.	y				63		
2 to 32 Beechwood Road	15	N	361	No current applications for housing.		15					
10 to 12 Caleb Close	24	N	364	see land at Caleb Close							0
146 to 158 Park Street	0	Y	n/a	Developed prior to 31/3/2018.							
Whitbread House, Flowers Way	96	N	n/a	Developed prior to 31/3/2018.	Y						
Land at the Orchard Centre, Strangers Way	27	N	402	17/00791/OUT; 19/01183/REM: Development of 48 dwellings underway	y						

Site Name	Potential Capacity (no. homes)	Site developed prior to adoption?	SHLAA ref	Current status (as at 1/4/22)	Major development?	Potential capacity for sites with no appl'ns	Homes applied for	Homes not started	Homes under construction	Homes complete before 31/3/18	Homes complete <u>1/4/18-1/4/22</u>
Unity House, 111 Stuart Street	101	N	n/a	Developed prior to 31/3/2018.	Y						
38a Wingate Road	15	N	412	No current applications for housing.		15					
26-30 Cardiff Road	0	Y	n/a	Developed prior to 31/3/2018 (offices)							
Wesley House, 19 Chapel Street	0	Y	n/a	Developed prior to 31/3/2018.						72	
Britannia Estate	295	n	460	20/00393/FUL: Permissions in place for Britannia House only - creation of 97 dwellings	Y			97			
<b>TOTAL</b>	<b>2225</b>				<b>TOTAL</b>	<b>405</b>	<b>574</b>	<b>644</b>	<b>506</b>	<b>284</b>	<b>238</b>
									<b>OVERALL TOTAL</b>		<b>2651</b>

Note: applications or approvals made after 31/03/2022 are not included in this table.

## Appendix Four: Monitoring spreadsheet - Housing Allocations in other Local Plan policies

### i. LLP8 : Napier Park

"The site is allocated for a mixed use neighbourhood development including B1 business uses... Provision will be made for between 600 and 1300 residential units with a convenience retail-led Neighbourhood Centre and a hotel."

Full Address	Site developed prior to adoption?	SHLAA ref (if applicable)	Status as at 01/04/2022	Major development?
Napier Park (Vauxhall Motors Ltd) Kimpton Road Luton LU2 0SY	No	191	13/00280/OUT; 16/01340/REM; 16/0900/FULEIA; 18/00562/AMEND Eaton Green heights being built. Saxon Square complete. (520 dwellings in total)	y
Former Vauxhall Motors Site Kimpton Road Luton	No	191	18/01280/MMAMD; 19/00527/AMEND Strawberry Star Lu2on being built (401 dwellings in first phase: Union House). Approval in place for second phase (592 dwellings).	y

### ii. LLP9: Power Court

"Allocated for town centre uses in a mixed use redevelopment... [including] 600 dwellings ..."

Full Address	Site developed prior to adoption?	SHLAA ref (if applicable)	Status as at 01/04/2022	Major development?
Power Court Luton	No	150	16/01400/OUTEIA; 20/01497/AMEND; 20/01587/OUTEIA Outline permission in place for up to 1,200 dwellings, along with other developments. Further applications expected.	Y

### iii. LLP10: High Town

"residential-led mixed use development whilst preserving and seeing opportunities to enhance the historical environment and heritage assets". *Note: all sites within the High Town Masterplan footprint are deemed "strategic allocations"*

Full Address	Site developed prior to adoption?	SHLAA ref (if applicable)	Status as at 01/04/2022	Major development?
41-43 Dudley Street Luton LU2 0NP	No	N/A	16/00172/FUL Development of 54 dwellings completed	y
114-134 Midland Road Luton - Hatton Place	No	588	17/00692/FUL Permission in place for conversion to 6 dwellings.	n
142 - 144 Midland Road Luton . LU2 0BL	No	188	07/01873/RENEW; 17/02167/FUL; 18/00061/FUL Development of 47 dwellings underway	y
10 Midland Road Luton LU2 0HR	No	488	18/01207/OUT Outline approval for development of 227 dwellings in place.	y
104A Midland Road Luton LU2 0BL	No	No	20/00422/PALITR Conversion to 8 dwellings under way.	
46 Old Bedford Road Luton LU2 7PA - The English Rose	No	606	18/01413/FUL Conversion and development of 6 dwellings under way.	
98-100 Wenlock Street Luton LU2 ONN – Land And Buildings At And Behind	No	422	05/00077/OUT Partial development completed prior to 31/3/2018 (4 dwellings). Remainder has not commenced.	
19 - 21 Burr Street Luton LU2 0HN	No	584	21/01782/FUL Permission for erection of 64 dwellings in place.	y
4 - 11 Burr Street Luton LU2 0HN	No	491	21/01782/FUL Permission for erection of 264 dwellings in place.	y
Land At 20 Charles Street Luton LU2 0EB	No	501	16/01279/FUL 49 dwellings completed.	y
16 - 18 Taylor Street And 1-21 York Street Luton LU2 0EY	No	494	18/00457/FUL Development of 16 dwellings underway.	
Car Park Taylor Street Luton LU2 0EY	No	No	19/00925/FUL Development of 32 dwellings underway.	y
82 High Town Road Luton LU2 0DQ	No	No	No current applications for housing.	

#### iv. LLP11: Creative Quarter

1. Northern Gateway: "allocated for a residential led scheme...delivery of a substantial amount of residential units, in the form of contemporary flats..." 2. Station Gateway: "residential led scheme...a substantial amount of residential units... contemporary flats..." (600 dwellings):

Full Address	Site developed prior to adoption?	SHLAA ref (if applicable)	Status as at 01/04/2022	Major development?
Northern Gateway	No	148	Application for provision of 177 dwellings pending decision.	y
Station Gateway	No	No	21/01115/EIASCR Pre-application for mixed use development, including 372 residential apartments, being considered.	y

#### v. LLP12: Marsh Farm

"re-arrangement of the housing estate's layout...comprehensive masterplan... A significant net increase in dwellings is not anticipated..."

Full Address	Site developed prior to adoption?	SHLAA ref (if applicable)	Status as at 01/04/2022	Major development?
Former Children Home Buckle Close Luton LU3 3RT	No	No	15/01600/FUL; 19/00489/FUL; 20/00764/FUL Permission in place for development of 37 dwellings.	y
Former Sherd Lodge Sherd Close Luton LU3 3LY	No	No	15/01600/FUL; 18/00494/MMAMD Conversion to 50 flats completed.	Y
Purley Centre The Moakes Luton LU3 3ST	No	149	15/00785/FUL, 16/01144/FUL; 17/01849/FUL; 18/01434/FUL 109 dwellings demolished and 118 new dwellings completed.	y

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