

Planning and Transportation

LUTON LOCAL PLAN (2011-31)

Housing Background Paper

April 2016

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1. INTRODUCTION

Purpose of a Background Paper:

- 1.1. Background Papers are an important source of information helping to outline and explain how policies in the Submission version of the Luton Local Plan (2011-2031) have been prepared.
- 1.2. Preparation of the plan has taken place over several years. One of the main roles of a background paper is to set out the approach taken to developing policies and the response to various overlapping factors that have been relevant to the process, such as:
 - Recognising that evidence prepared at different times or focusing on different objectives, issues and specialist areas should be considered 'in the round'. Studies are often prepared concurrently, but at other times further consideration helps to explain the interaction between different findings.
 - Government policy including that set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) which might have changed whilst the plan was being prepared. Recent changes to rights for Permitted Development (such as 'office-to-residential) are one such example.
 - Changes in the local and national economy influencing potential demand for different development types, such as changes in house prices or designation of the Luton Airport Enterprise Zone.
 - Looking across all the evidence and consultation responses to inform overall views on:
 - The most appropriate balance between policy topics and of land uses for the plan;
 - Where relevant, the most appropriate targets for specific development types or outcomes; and
 - The most appropriate sites and strategic locations to meet different requirements.
 - Specific national policy requirements such as the preparation of a Strategic Housing Market Assessment and an objective assessment of housing and employment needs which does not have regard to potential constraints such as a lack of sites or the presence of Green Belt designations;
 - Taking account of how evidence and emerging proposals relate to plan-making activities in nearby authorities as part of the Duty to Co-operate. This helps to understand the relationship between different land uses and the ability to provide for different needs such as employment, retail and housing.

- Taking account of more recent evidence since relevant studies were first completed or alternate sources of evidence that might suggest different answers or preferable options
 - The relationship with infrastructure provision, including the existing position, programme for future work and sources of available and required funding.
- 1.3. When tackling these factors ‘in the round’ it is not always appropriate or possible to translate recommendations from one particular study or Local Plan stakeholder directly into policy.
- 1.4. The Council has prepared a series of Background Papers. The Overall Approach Background Paper sets out the context to the plan’s preparation as a whole. This is then supplemented by a series of topic based Background Papers and a separate Duty to Co-operate Statement. The aim of each Background Paper is to demonstrate the ‘direction of travel’ for each topic and how this provides the most appropriate strategy for the future development and growth of Luton. The intention is to signpost rather than to duplicate the detailed technical evidence which is already available in the evidence base.
- 1.5. The Background Papers have a common structure identifying (Section 2) the topic(s) covered, (Section 3) the main issues addressed in the main body of the report, (Section 4) a listing of that part of the evidence base especially relevant the topic(s) (Section 5) the main body of the report addressing the issues, and (Section 6) concluding remarks.

2. THE TOPIC FOR THIS BACKGROUND PAPER – HOUSING

- 2.1. The Housing Background Paper succinctly tells ‘the story’ behind the housing provision identified within the Luton Local Plan 2011-2031 and how this supports the plan as a whole, including the concentration of growth and investment in eight strategic allocations. It also has a strong relationship with topics covered by other Background Papers including Gypsies and Travellers, Economy & Employment, Centres, Green Belt, Facilitating Growth - Transport and Implementing the Local Plan.
- 2.2. The submission of the Luton Local Plan represents the culmination of a huge amount of effort overseen by the Council's cross-party Local Plan Working Party. The submission of the Luton Local Plan (2011-31) was agreed by Full Council at its meeting held on 22 March 2016. It comprises the Pre-submission version as agreed by the Council's Executive in September 2015 together with a Schedule of Minor Modifications, the Policies Map including a Town Centre Inset and the accompanying Sustainability Appraisal.
- 2.3. The Local Plan is important for many reasons although the following five points are particularly noteworthy in relation to aspects of housing provision:

- i. The approach to housing in the Local Plan is based upon the preparation of the Luton and Central Bedfordshire Strategic Housing Market Assessment, which identifies the full objectively assessed need for housing across the functional Housing Market Area as well as the specific requirement of 17,800 dwellings from the Luton Borough administrative area.
- ii. Luton comprises a densely populated urban area with a high degree of competition for different land uses (alongside providing protection for important areas of open space) within tightly drawn administrative boundaries. It is historically recognised as a capacity-constrained location in terms of being able to provide in full for identified needs for housing; necessitating co-operative working with adjoining areas.
- iii. The Local Plan provides a clear vision for the area and looks to achieve a number of strategic objectives for the town, many aspects of which will be delivered by the strategic allocations identified in the Plan as well as being provided for across the policies of the plan as a whole. This approach looks to maximise opportunities for the delivery of housing, subject to providing and maintaining high quality living environments including the protection of valued amenity space. A number of the strategic allocations are 'housing-led' or provide for a specific degree of residential development as part of a range of mixed-uses and developing the policies as a whole has looked to wherever possible identify specific opportunities for housing and provide aspirational but realistic estimates for the deliverable and developable supply of housing.
- iv. The Local Plan provides for the housing needs of all groups in accordance with national policy, including taking account of the need for affordable housing and how this can be secured alongside considering specific groups such as housing for students and older people.
- v. The Local Plan identifies a deliverable and developable supply of housing which supports achieving a significant boost in housing delivery upon adoption, compared to recent historic trends and the historic targets of County Structure Plans and Regional Plans (see Paragraph 5.57).
- vi. The Local Plan and its evidence base provide an important benchmark on the opportunities for increasing housing output and the approach incorporates significant scope for Monitoring and Review. This includes flexibility in the pattern of delivery and opportunities to update evidence to take account of the latest information.

2.4. In summary, there are significant benefits to plan-making locally resulting from preparation and submission of the Luton Local Plan, which complies in full with the two-stage process to setting housing requirements identified by national guidance. This helps to set aspirational but realistic objectives for delivering housing alongside the wider strategic objectives for plan-making in Luton and the sub-region as well as furthering understanding of the level of any unmet needs. This in-turn supports effective monitoring and review and intends to inform the most appropriate strategy to meet those unmet needs which arise due to Luton's circumstances.

2.5. It is inevitable that there will be some areas of disagreement. Amongst the representations received as part of consultation on the Pre-Submission Luton Local Plan 2011-2031, many highlighted aspects of the Plan's approach to identifying and providing for housing needs. Some of the representations endorsed some but not all aspects of the evidence base for the Local Plan, whereas others identified specific soundness concerns or site-specific issues. Amongst the key areas identified include:

- Broad agreement on the identification of the Luton and Central Bedfordshire Housing Market Area;
- Luton's housing capacity – The capacity is being queried in several ways, including assumptions within Luton's Strategic Housing Land Availability Assessment (SHLAA) methodology (such as assumptions on windfall sites and densities) and potential alternative use of employment sites / strategic allocations for housing to reduce the housing shortfall;
- Disagreement on the level of unmet housing need arising from housing provision identified in the Luton Local Plan which would need to be provided for through work with neighbouring authorities under the Duty to Cooperate
- The need to take account of the latest information in terms of planning applications or emerging proposals for identified sites;
- Requesting the inclusion of specific omission sites;
- The achievability and viability of the approaches to provide for affordable housing and other requirements from development.

2.6. A number of these issues are explored in other Background Papers and the Duty to Cooperate Paper. This Background Paper clarifies the approach taken to identify full objectively assessed housing needs and addresses the reasons for the level, locations and type of housing capacity identified and the justification for this.

3. THE MAIN ISSUES FOR THIS BACKGROUND PAPER

3.1. The following key questions are addressed in the Section 5 of this Background Paper:

- Issues affecting the identified housing provision in the Luton Local Plan 2011-2031:
 - The correct approach to identify need and provide for housing.
 - The approach to identifying the housing requirement.
 - Assessing Luton's housing capacity.
 - The context for past and future delivery trends.
 - Luton's role in the wider housing market, in-particular as part of the local conurbation with Dunstable and Houghton Regis
 - Contributing to a sub-regional understanding of any identified overall housing shortfall and the relationship with the Growth Options Study
 - The approach to any allowance for 'windfall development'.
 - The approach to Permitted Development Rights
 - The approach towards specialist housing for students and older people (including Use Class C2)

- Provision for Monitoring and Review and updates to the evidence base (including updating the Strategic Housing Land Availability Assessment to an April 2016 base to inform Examination of the Local Plan)

4. KEY EVIDENCE STUDIES INFORMING THIS BACKGROUND PAPER

- 4.1. There is a comprehensive evidence base that sits behind the Local Plan. All the documents are listed and are available from the Council's website at the following url: <http://www.luton.gov.uk/Environment/Planning/Regional%20and%20local%20planning/evidence-base/Pages/default.aspx>
- 4.2. The structure of the documentation is listed as follows, starting with the documentation that forms the Submission version of the Luton Local Plan (2011 to 2031). Only specific documents that are referred to in this Background Paper are referenced in full.

The Luton Local Plan (2011 - 2031) [SUB]:

- SUB 001 - Luton Local Plan (2011 - 2031) - Pre submission version - October 2015 - Luton Borough Council
- SUB 001A – Luton Local Plan (2011 - 2031) – Schedule of Minor Modifications to the Pre submission version – April 2016 - Luton Borough Council
- SUB 002A - Luton Local Plan (2011 - 2031) - Submission version policies map – April 2016
- SUB 003A - Luton Local Plan (2011 - 2031) - Pre submission version town centre inset – April 2016
- SUB 004A - Sustainability appraisal of the Luton Local Plan - Sustainability report on the submission Local Plan - March 2016 - Urban Edge
- SUB 008 – Luton Local Plan (2011 - 2031) – Pre Submission Version Consultation Response – Summary – April 2016 – Luton Borough Council

Vision, objectives and spatial strategy [STR]

- STR 008 - Corporate Plan 2014-2017 - Luton Borough Council
- STR 010 - Luton's Joint Strategic Needs Assessment 2015 - Luton Borough Council and Luton Clinical Commissioning Group
- STRAT 018 High Town Masterplan, 2016, BDP for Luton Borough Council

Housing [HOU]

- HOU 003 - Bedfordshire and Luton strategic housing market assessment - March 2010 - ORS/Savills
- HOU 003d - Housing Market Areas in Bedfordshire and surrounding areas
- HOU 003b - Luton and Central Bedfordshire strategic housing market assessment refresh - 2014 - ORS
- HOU 003c - Luton & Central Bedfordshire strategic housing market assessment 2015 - ORS
- HOU 004 - Strategic housing land availability assessment (SHLAA) - April 2014
- HOU 004a - Strategic housing land availability assessment (SHLAA) - April 2015 - Luton Borough Council
- HOU 005 - Luton Borough Council affordable housing viability study - April 2013 - Three Dragons

HOU 008 - Milton Keynes and South Midlands sub-regional strategy - March 2005 - Government offices for east of England - East Midlands and south east of England
HOU 009 - East of England plan - Revision to the regional spatial strategy for the east of England - May 2008 - Government office for the east of England. NB: The regional spatial strategy was revoked in January 2013
HOU 010 - Empty homes strategy - Improving and moving forward together - 2009 to 2014 - Luton Borough Council
HOU 011 - Luton private sector renewal strategy – 2010 to 2013 - Improving and moving forward - Luton Borough Council
HOU 012 - Luton's housing strategy – 2012 to 2015 - Luton Borough Council

Infrastructure delivery and monitoring the local plan [DEL]

DEL 002 - Monitoring report - December 2012 - Luton Borough Council
DEL 002a – Monitoring report – December 2012 – December 2015 – Luton Borough Council
DEL 003 - Luton Local Plan: Viability assessment - executive summary - November 2013 - Nationwide CIL Service
DEL 003a - Viability Study - October 2015 - Luton Borough Council
DEL 005 – Luton’s Investment Framework – April 2016 – Luton Borough Council

Other relevant documentation [ORD] – including the extant Luton Local Plan 2001 to 2011 and other documentation relating to the Luton Local Plan 2011 to 31

5. MAIN BODY

i. The Correct Approach to Identify Need and Provide for Housing

- 5.1. NPPF envisages that local planning authorities will set the housing requirement in their Local Plans in two principal stages. The requirements of NPPF Paragraph 47 make this clear, in terms of the first bullet point which requires determination of what the full objectively assessed needs for market and affordable housing are in the relevant housing market area. The Local Plan should look to meet this need *“as far as is consistent with the policies set out in this Framework”*.
- 5.2. Second there must be an assessment of what level of housing provision (or ‘target’) is consistent with the policies set out in the NPPF. The subsequent bullets of NPPF Paragraph 47 indicate the need to *“identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”* in addition to setting out how the plan will maintain a five year supply of land for housing; identify key sites critical to the delivery of the housing strategy; and illustrate expected delivery rates through a housing trajectory. Within the context of plan-making, this supports Local Plans that *“should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change”* (NPPF Paragraph 154).
- 5.3. Paragraph 6 of the NPPF sets out that *“the policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system”*. The strategic priorities for plan-making, therefore include not only homes but also jobs, provision of retail, leisure and commercial development, transport and other infrastructure, community and other facilities and the conservation and enhancement of the natural and historic environment (NPPF Paragraph 156). Key matters cannot be overlooked such as ensuring the vitality of town centres (Paragraph 23); balancing land uses to promote sustainable transport and reduce journey lengths (Paragraphs 37 and 41); the provision of shared space and community facilities and guarding against the loss of valued services (Paragraph 70); and giving great weight to the need to create, expand or alter schools (Paragraph 72).
- 5.4. The need to work collaboratively and co-ordinate the delivery of strategic priorities across local authority boundaries recognises that these various development requirements may not be met within the area of a single authority – *“for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework”* (NPPF Paragraph 179).
- 5.5. When combined with a local understanding of specific circumstances in Luton, the provision made through the Luton Local Plan 2011-2031 should be considered positively prepared. It has been widely acknowledged in previous iterations of plan-making (including Local Plans, County Structure Plan and Regional Plans) that Luton has had and

continues to experience significant capacity constraints. The evidence base for the Local Plan 2011-2031 provides the most recent understanding of these issues. It offers ongoing policy support to significantly boost the supply of housing as well as reflecting the wider priorities for plan-making.

- 5.6. The following components of this Background Paper highlight how these two specific stages have been complied with as part of identifying the housing provision set out in the Luton Local Plan as well as considering the requirements of national policy as a whole.

ii. Comparison with Previous Housing Requirements and Records of Delivery and the Approach to Identifying the Housing Requirement

- 5.7. Due to the complex demographic environment within Luton and its close housing market links with surrounding areas there is a key requirement to provide comprehensive and up-to-date evidence of housing needs in the local area.
- 5.8. Identifying the housing requirement within the Luton Local Plan 2011-2031 has followed national policy and guidance to synthesise a broad range of evidence to inform the most appropriate figure.
- 5.9. The 2015 SHMA represents the latest iteration of a detailed series of work that has helped to inform and analyse the complex demographic environment in Luton and identify the Luton 'Functional' Housing Market Area as a whole. Its preparation cannot be divorced from earlier work to establish local understanding in terms of population change, migrant flows and the boundaries of the housing market. The 'Luton and Central Bedfordshire Strategic Housing Market Assessment' (2010) (HOU003) comprises the starting point for this series, but should also be read alongside HOU003d; HOU003b and a number of supporting technical documents that sit alongside these sources. A number of key consistent points can be drawn from these sources:
- A 'Luton' 'functional Housing Market Area' broadly centred on Luton and incorporating Dunstable, Houghton Regis and the majority of south Central Bedfordshire has been identified in each iteration since 2010;
 - Identification of this Housing Market Area is consistent with evidence from at least two Censuses (2001 and 2011);
 - Strong evidence in terms of Travel to Work, Migration and Housing Rental Market patterns also supports consistent identification of this Housing Market Area based on a high degree of self-containment.
 - Other functional linkages identify part of the functional HMA extending into parts of Aylesbury Vale and North Hertfordshire District Council
- 5.10. It is important to highlight and keep in mind that despite a high degree of consistency between the evidence in these documents, they have variously been prepared under different regimes of planning guidance and planning policy alongside a need to take into

account the most recent information (e.g. outputs from the 2011 Census for England and Wales). A number of key points have been identified and addressed as part of work on the Strategic Housing Market Assessment (and considered in more detail below):

- The need to engage neighbouring authorities as part of work to prepare a Strategic Housing Market Assessment and identify full objectively assessed housing needs (NPPF Paragraph 159);
- The relationship between Luton and the functional Luton Housing Market Area, including the conurbation with Dunstable and Houghton Regis;
- Take account of where establishing housing need should also consider sensitivity testing and take account of local evidence e.g. alternative assumptions for underlying projections; and
- Recognise where previous projections of housing need were guided by “policy-on” considerations e.g. as part of Regional Plans and therefore depart from the current methodology set out in national policy and guidance.

Engagement with Neighbouring Local Planning Authorities

5.11. Preparation of an iterative suite of documents has ensured that at all stages the urgent need to prepare and make available a comprehensive Strategic Housing Market Assessment has been met. This work has also included regular engagement with the Luton and Central Bedfordshire HMA / SHMA Steering Group incorporating the local planning authorities either within or adjoining the Housing Market Area (e.g. Luton, Central Bedfordshire, Aylesbury Vale, North Hertfordshire and other surrounding areas with relatively strong linkages such as Dacorum – more details are available in the Duty to Cooperate background paper). Key decisions secured through the group include accepting that the basis for the Luton and Central Bedfordshire Housing Market Area remains robust; and the need to consider alternative population projections for Luton Borough.

Relationships within the Functional Luton HMA and Implications for Delivery

5.12. The definition of the Luton ‘Functional Housing Market Area’ is an important starting point for plan-making in the area and to inform work under the Duty to Cooperate. The December 2015 “Housing Market Area in Bedfordshire and surrounding areas” (prepared by ORS) (HOU003d) provides the latest understanding of this Housing Market. The following table provides the breakdown of population distribution within the ‘Functional HMA’:

	Luton Functional HMA	
	No. of people (2011)	% of LA Population
Aylesbury Vale DC	3,100	1.8%
Central Bedfordshire	114,900	45.2%
Luton	203,200	100%
North Hertfordshire	1,700	1.3%

Table 1 – Population by Local Authority identified in the Luton Functional HMA

- 5.13. In accordance with relevant guidance set out in HOU003d, these percentages are based on the functional linkages between places and are not constrained by administrative boundaries. This confirms that Aylesbury Vale and North Hertfordshire are part of the functional HMA, albeit representing a relatively small proportion of the respective LA populations and at areas spatially concentrated on the south-west boundary of Central Bedfordshire and immediately east of Luton respectively. However, this provides one relevant consideration for where unmet needs arising in Luton Borough might be met. This is reflected, for example, in North Hertfordshire District Council's recognition of the contribution that land east of Luton could make towards meeting the Borough's needs.
- 5.14. Of potentially greater significance is the relationship that Central Bedfordshire has with a number of other Functional HMAs; and that it does not demonstrate the necessary self-containment or linkages to provide a functional HMA in its own right. These comprise the Milton Keynes, Stevenage and Bedford HMAs and represent 20.1%, 28.6% and 6.1% of the Local Authority population respectively. Only 30% of the combined Luton and Central Bedfordshire population does not fall into the Luton Functional HMA.
- 5.15. Because the relationship with the Luton functional HMA in terms of proportion of the Central Bedfordshire resident population represents almost as many people as the next two largest (Stevenage and Milton Keynes) combined, it is appropriate that a combined area of Luton and Central Bedfordshire represents a 'best fit' for defining a housing market along administrative boundaries.
- 5.16. In terms of subsequently identifying the objectively assessed need for housing, each area is covered by respective population projections for its administrative area. In terms of the scale and location of housing provision, Central Bedfordshire will inevitably take account of different functional linkages and their spatial extent. Indeed, Fig.63 of the 2015 SHMA (HOU003c – copied below) provides an apportionment of objectively assessed need across the different functional HMAs in Central Bedfordshire.

Figure 63: Objectively Assessed Need for Housing across the functional Housing Market Areas within Luton and Central Bedfordshire 2011-31 (Note: Figures only identify need within Luton and Central Bedfordshire administrative areas)

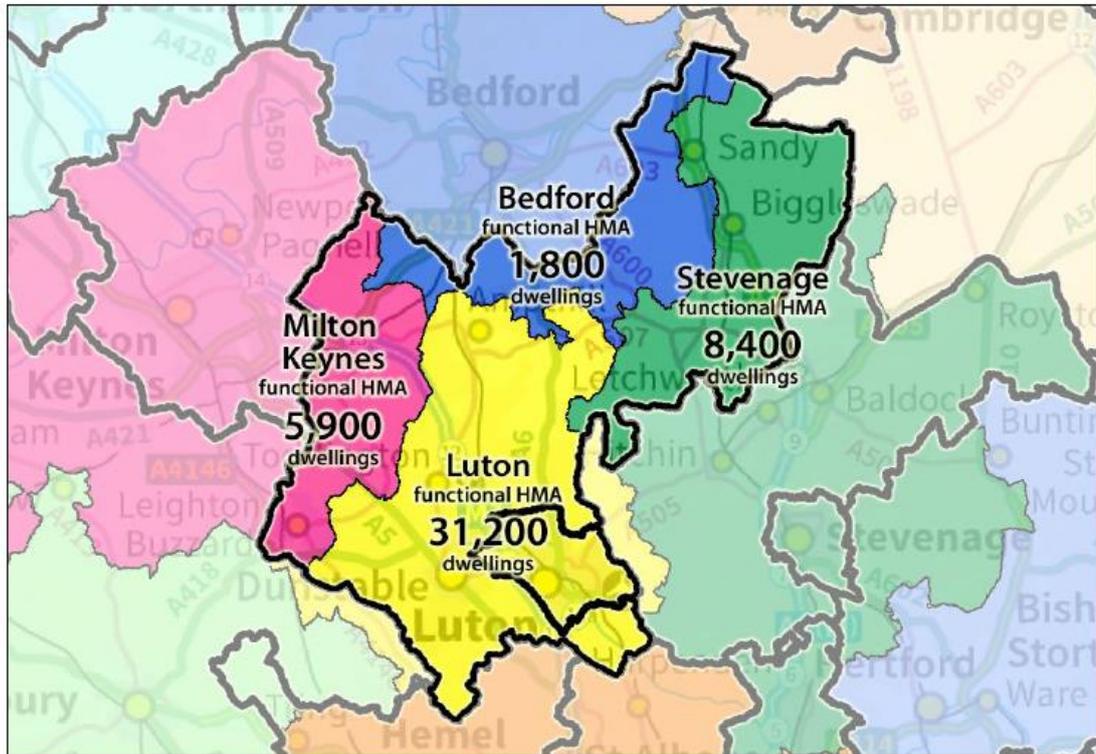


Fig.1 – Diagram showing Functional Housing Market Areas in Luton and Central Bedfordshire

- 5.17. This diagram identifies that of the combined objectively assessed need in Luton and Central Bedfordshire of 47,300 dwellings, 31,200 dwellings of this need is related to the Luton functional HMA. This comprises the full OAN of Luton of 17,800 dwellings and 13,400 of the 29,500 dwellings OAN calculated for Central Bedfordshire. This represents 45.4% of the objectively assessed for Central Bedfordshire, and over 66% of the total projected need for the ‘best fit’ Housing Market Area.
- 5.18. The spatial coverage of the different functional housing market areas in Central Bedfordshire generally reflects the proximity of the relevant urban centre of those markets – for example locations associated with the Bedford HMA adjoin the Bedford Borough boundary. However, the largest geographic area is covered by the Luton Functional HMA.
- 5.19. Strong links in terms of migration and Travel to Work flows span a relatively wide area, incorporating settlements further afield such as Toddington and Ampthill. However, in terms of population the 114,900 Central Bedfordshire residents apportioned to the Luton Functional HMA over 54,000¹ can be identified as residing in the Built-Up Areas of Dunstable and Houghton Regis. Coupled with Luton’s population (203,200) this gives a total population for the ‘conurbation’ of 256,730. This does not include other village

¹ Based on 2011 Census estimates

settlements in close proximity to Luton which are nonetheless very well-related to the main urban area.

- 5.20. The conurbation population represents 56% of the combined population of Luton and Central Bedfordshire. More importantly, it represents over 80% of the population in the Luton Functional HMA. This pattern highlights a significant local concentration of population which establishes a strong sub-regional role for the main urban area. This is considered to be highly important for the objectives of the Luton Local Plan as a whole and the balance of land uses to be provided for. It also represents a determining factor in understanding local drivers of growth and provides a basis to understand where the greatest proportion of need should be met.
- 5.21. This understanding of the local housing market raises important considerations in the context of achieving key aspects of national policy. For example, objectives such as significantly boosting the supply of housing are relevant to the conurbation as well as Luton as a single administrative area. Delivery across the conurbation over the past 5-13 years has varied between c.460 to c.650 dwellings per annum (depending on the period chosen) (c.320dpa – 480dpa in Luton and 140 – 180dpa in Dunstable and Houghton Regis).
- 5.22. The SHMA (2015) does not apportion a specific need to the 'conurbation'. However, the needs of Luton plus a proportion of the need associated with the Luton functional HMA within Central Bedfordshire (i.e. approximately half of the 114,900 referred to in Para 5.19 above) could suggest a total 2011-2031 requirement of around 24,000 to 26,500 dwellings (1,200 to 1,325dpa) for the conurbation. This level of need would represent around 200% of output compared to years prior to the downturn; and upwards of 280% on more recent trends. In reality this rate of delivery would need to increase to offset shortfall since the start of the plan period in 2011 – in some instances to levels 300% of those recently recorded.
- 5.23. Achieving such increase will realistically include the delivery of major schemes in greenfield locations. Such schemes are not typically represented in recent patterns of delivery, and will be critical to complementing the overall make-up of supply as well as their relationship to wider strategic objectives such as delivery of key infrastructure. This includes some existing committed examples, such as land North of Houghton Regis and its relationship with delivery of the A5-M1 Link Road. The balance of delivery from greenfield and brownfield sources will also be relevant at the conurbation scale, particularly given the exceptionally high reliance on previously developed land within Luton.
- 5.24. The Growth Options Study, being jointly prepared by Luton and Central Bedfordshire Council, will explore important aspects associated with any appropriate opportunities to achieve this scale of development. This Study, and subsequent considerations, will comprehensively need to evaluate the extent to which meeting these needs is realistic and deliverable in terms of the housing market and to what extent it remains consistent

with the policies of the NPPF as a whole. It is also critical to understand the relationship between the required large-scale growth and to ensure that it does not compromise future regeneration objectives within Luton (e.g. in terms of additional infrastructure requirements).

- 5.25. The Council considers that Submission, Examination and the intended adoption of the Luton Local Plan represent crucial plan-making benchmarks to inform these broader conclusions across the conurbation and Housing Market Area. The Local Plan provides a full range of policies to deliver its main strategic objectives. This includes an appropriate basis for boosting housing output within the context of the town and its overall strategic priorities, such as the role of the Town Centre and key sites such as London Luton Airport. It is appropriate to put in place planning policies at the earliest opportunity to secure and enhance the key roles and functions of Luton and its main strategic opportunities within this complex housing market context.

Consider Sensitivity Testing and Take Account of Local Evidence

- 5.26. In accordance with national guidance, the assessment of housing need should, where appropriate, consider sensitivity testing specific to their local circumstances (NPPG: ID: 2a-017-20140306). Luton's demography warrants detailed analysis due to a variety of factors but principally associated with the high turnover of population, the proportion of BME groups and the degree of fluctuation in these trends recorded in different secondary data sources and over different periods. Also relevant are methodological changes at the national level (as derived by the Office for National Statistics) which makes comparing different time-series of official projections more difficult.
- 5.27. Understanding of these issues has developed over a number of years, meaning that investigation had begun prior to the most recent data being made available. For example, Luton Borough Council commissioned work on the reliability of the 2001 Census estimate for the town prior to any data being collected or release for the 2011 Census for England and Wales. This work has been complemented by internal work conducted by the Council's Research and Geospatial Information team, meaning that preparation of the SHMA has been informed by a range of evidence to improve the granularity of data sources.
- 5.28. A key element of the evidence informing projections in the Luton and Central Bedfordshire SHMA is the high degree of analysis they provide into longer-term trends and most likely patterns of population change. For example, analysis undertaken by Mayhew Harper Associates (MHA) identified a minimum confirmed population of 202,700 people in Luton Borough at 2010. Evidence to inform this estimate includes interrogation of records such as registration with GPs and the pupil population in local schools. This has provided a robust basis to re-base estimates of population change and understand longer-term linear trends. The analysis has since been supplemented by work underpinning the SHMA, such as National Insurance Number (NiNo) registrations to overseas nationals.

- 5.29. The implications for these revisions are set in a longer-term context. The revised mid-2001 population estimate was 185,900 people, which represented an increase of 2,600 on the original estimate; nevertheless, whilst the Council did not produce an official alternative population estimate for 2001, they believed that the resident population was likely to be at least 190,000 people at that time.
- 5.30. The 2011 Census estimate for the population within Luton Borough was relatively close to that provided by the preceding series of mid-year population estimates from 2002-2010 (and based on the estimate for Luton calculated by the Mayhew Harper Associates). However, this overlooks a highly uneven pattern of estimated population growth in the previous decade: effectively showing rapid population growth in the years immediately prior to the Census. To some degree this is also accentuated by revisions to the mid-year estimates based on methodological changes (including the distribution of international migrants) which mainly affect the latter end of the series.
- 5.31. The SHMA uses this information to highlight that there is likely to be no single correct figure for projected population growth within Luton, but that broadly consistent findings can be identified from the mid-point of longer-term trends (over a 10 and 20-year horizon) based on official estimates and the revised estimates produced as a result of local work in Luton. Overall this outlines the potential unreliability of shorter-term trends over the preceding five years (2007-2012) and overall benefit of taking a longer-term view.
- 5.32. This revised series of projections provides a baseline against which to undertake the remaining elements of work needed to identify full objectively assessed housing need as well as the starting point for updating the SHMA. For example, the SHMA (Update) 2015 uses as inputs the more recent evidence for household formation provided from the 2012-based CLG Household Projections.
- 5.33. Appropriate adjustments to the revised series of projections are also applied within the SHMA as part of taking account of market signals. Within Luton this represents an uplift of 10% of the housing need identified based on the household projections, taking account of recent trends in affordability and concealed households.

Relationship with Evidence to inform the East of England Regional Plan

- 5.34. The Luton and Central Bedfordshire SHMA (2015) adopts a markedly different approach to assessing housing need for the area compared with some previous work.
- 5.35. Whilst the SHMA presents a figure for housing need for the 'functional' Luton and Central Bedfordshire HMA, it also incorporates a 'best fit' estimate of need specifically for Luton Borough based on the administrative data and projections prepared specifically for the area as described above. The results offer a markedly different output from previous studies, which to varying degrees reflect a "dwelling-led" forecast for population growth and sought to 'apportion' an element of growth requirements specifically towards Luton.

- 5.36. In relation to assessing housing requirements and supply, National Planning Practice Guidance recognises that “*evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs*” (ID: 3-030-20140306). It should be kept in-mind that previous forecasts are also likely to pre-date more recent annual estimates of population change (from the second half of the 2002-2010 period) also suggesting a higher rate of growth (notwithstanding the accuracy of these).
- 5.37. However, in terms of understanding the relationships within the ‘functional’ Luton and Central Bedfordshire Housing Market Area it is relevant to take account of how the area was considered in the context of Regional plan-making. In principle, the evidence in the latest (NPPF-compliant) SHMA and that used to identify a broader requirement for 26,300 dwellings between 2001 and 2021 within “Luton / Dunstable / Houghton Regis together with Leighton Linlade” Policy Area (first identified in the Milton Keynes-South Midlands Sub-Regional Strategy) both point to a high degree of self-containment. This is underpinned by the linkages across the ‘functional’ Housing Market Area. The relevance of such linkages (e.g. migration flows) remains pertinent to national guidance for identifying housing market areas (ID: 2a-011-20140306).
- 5.38. Various iterations of evidence support the definition of a Luton and Central Bedfordshire Housing Market. Formally, this was identified for the combined area of the Luton and South Bedfordshire administrative areas. Subsequent alterations to administrative boundaries mean that the ‘best fit’ market area now incorporates the entire authorities of Luton and Central Bedfordshire. However, for the purposes of analysis the specific ‘Luton and Central Bedfordshire’ functional HMA follows a broadly similar geography to earlier studies. This provides a good starting point for information.
- 5.39. It is relevant that previous projections were ostensibly ‘dwelling-led’ (particularly for Luton) and therefore have little comparative merit to the preparation of full objectively assessed housing needs. However, indicators and estimates of demographic change were used as part of ‘benchmarking’ for the dwelling targets chosen. This provides a useful basis from which to understand recent changes in trends and compare against the overall requirement for housing provided by the latest SHMA.
- 5.40. Evidence for the Regional Plan compared a forecast of population growth for the Policy Area based on the plan-led (“policy-on”) dwellings target and a demographics-driven ‘net-nil migration’ in which Luton did not generate a net outflow of migrants (as recorded in population estimates around the turn of the millennium). This generated a difference of some 3,800 households between the total regional requirement under the RSS (26,800 households) and the “local” growth forecast (23,000). This suggests that the bulk of growth requirements would actually be providing for need generated locally within the Luton and South Bedfordshire (using pre-2009 administrative boundaries) area rather than outside the area.

- 5.41. In reality, it has been regularly acknowledged (see elsewhere in this Background Paper for a summary) that a lack of space, physical capacity and other policy considerations (e.g. open space, nature conservation) that such levels of growth could not be accommodated within Luton’s administrative boundary. In such circumstances, the growth expected in Luton would be diverted to other parts of the surrounding area.
- 5.42. The Strategic Housing Market Assessment (and crucially the identification of the Luton and Central Bedfordshire Housing Market Area) provides an essential link with this understanding. This provides an important context for how and where unmet needs are likely to arise. There are a number of important points for this comparison.
- 5.43. Firstly, Luton is no longer a significant generator of net out-migration. This reflects a number of factors observed in more recent trends, in-particular increased rates of international in-migration but also the increased attractiveness to in-migrants from elsewhere in the UK due to opportunities for employment, further education or access to cheaper housing. Secondly, the change in the balance of net-migration does not necessarily reflect a significant change in all gross migration flows; or flows between specific places. In-particular, levels of out-migration from Luton Borough have not themselves generally reduced and gross out-migration flows to Central Bedfordshire specifically remain by far the most significant movement of people.
- 5.44. Paragraph 4.28 of the SHMA provides some commentary on the potential implication for these changes when considering ‘fixed’ migration flows or migration rates as part of future projections:

“Assuming that Luton’s population did grow in line with the projections, it is likely that out-migration would also increase in future; but if in practice the population growth is dispersed (with a proportion of the growth accommodated in surrounding areas), future outmigration levels from the borough would also not increase to the same extent – so the consequences of these higher figures should also be considered. (Paragraph 4.28)”

- 5.45. This provides the context to consider growth across the housing market as part of the full objectively assessed housing needs. In summary, although Luton now appears as a net recipient of migrants (with needs broadly similar to the ‘net-nil’ migration outcome explored above) for the purposes of identifying objectively assessed housing need this does not in itself significantly affect the understanding of the functional housing market area.

iii. The Approach to Assessing Housing Capacity in National Policy and Guidance

- 5.46. The evidence base for the Luton Local Plan 2011-2031 is supported by the preparation of a number of Strategic Housing Land Availability Assessments. These have been prepared at regular intervals and updated as necessary in-line with national policy and guidance, also providing an update on the five year supply of land for housing.

5.47. National planning policy and guidance attaches great importance to the assessment of land availability and making realistic assumptions for delivery as part of the evidence for the preparation of Local Plans (NPPF Paragraph 159 and NPPG ID: 3-001-20140306). The process of assessing the availability of land for housing (and economic development) to meet the needs of the plan does not itself complete the work required to support the allocation of any specific sites for development.

5.48. This work allows important conclusions to be reached on the suitability of a given location (e.g. having explored what constraints may affect the land). It also helps to establish whether the site is likely to be made available for a given use at a given point in time and whether there is a realistic possibility of development being achieved – essentially whether a site is viable based on the best information available. It is important, however, that national guidance recognises:

“It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs. (NPPG ID: 3-003-20140306)

5.49. Guidance (NPPG ID: 3-019-20140306) recognises that in assessing the suitability of land for housing or other economic development uses:

“the suitability of sites or broad locations for development should be guided by:

- *the development plan, emerging plan policy and national policy;*
- *market and industry requirements in that housing market or functional economic market area.”*

5.50. Where assessing sites against adopted policies, it is important to consider whether these are up-to-date and represent relevant constraints on development. Equally, however, the planning landscape following the introduction of the NPPF and since revocation of Regional Planning Policy has generated a significant demand for new evidence and an understanding of the role and function of different places. This ultimately generates important influences on the overall Local Plan strategy and the requirement to direct the right amount of land uses to the most sustainable places. It is therefore appropriate that the assessments in the SHLAA to some degree take into account the competing land use pressures within the town and the findings of the latest evidence in terms of Luton’s sub-regional role in terms of employment, retail and leisure; albeit seeking to maximise the scope for housing delivery where possible.

5.51. NPPG ID: 3-011-20140306 sets out that *“an important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints, rather than simply to accept them”*. It is therefore of significant benefit that the SHLAA process in Luton has been able to actively consider where sites conditions for development might have changed, such as through the greater prospects for Change of

Use, intensification of activity or improvement in the underlying economy or environment. There is a relationship between this revised assessment for known locations and using associated evidence – such as within the 2013 review of town centre office premises (CEN004) – to actively identify new locations.

- 5.52. The approach further echoes NPPG ID: 3-012-20140306 in ensuring that a full range of sources for site identification are considered (such as surplus public sector land or records of refused and expired planning applications). It is important to note that the identification of sites cannot then be separated from the guidance (NPPG ID: 3-014-20140306) on what should be included as part of site assessments. This takes into account that assessments should highlight an up-to-date view of development progress; resolve any inconsistent information; understand what scale of development may be appropriate; and how any barriers might be overcome.
- 5.53. A number of factors addressed in national guidance are particularly relevant for Luton when assessing sites in detail. For example, there is extensive evidence of sites where the planning background shows a history of unimplemented planning permissions; leading to 'lumpy' patterns of delivery and land availability even when consent is in place (NPPG ID: 3-020-20140306).
- 5.54. Guidance also states that a realistic understanding of development potential is important to the site assessment process. This provides important links with the evidence base for Local Plan-making. NPPG ID: 3-017-20140306 goes on to state that:
- “[A]ssessing achievability (including viability) and suitability can usefully be carried out in parallel with estimating the development potential.”*
- 5.55. It is therefore important that national guidance is followed in terms of identifying a realistic and deliverable supply of land for the future provision of housing as part of the plan-making process. Essential outputs will include the indicative trajectory of development and consideration of associated risks. The preparation of the Luton Local Plan is consistent with this approach, as explored in more detail below.

iv. Identifying Housing Capacity in Luton Borough

- 5.56. The Luton Local Plan 2011-2031 takes a supply-led approach to identifying the appropriate level of housing provision in the plan and which is in-line with the guidance referred to above. The Plan makes provision for 6,700 dwellings over the plan period because this is the greatest output considered to be realistically achievable in the context of the best available evidence of overall supply and the key housing sites central to the delivery of the strategy.
- 5.57. The level of provision identified represents a significant increase on previous estimates of capacity. Historic evidence from preparation and review of the East of England Regional Plan identifies a “Luton element” of 3,500 dwellings (from 2001-2021) comprising a proportion of the overall target of 26,300 dwellings from the overall

requirement for the “Luton / Dunstable / Houghton Regis with Leighton Linlade” Policy Area. This target was informed by a series of ‘capacity-led’ estimates arising from a range of studies (with key evidence dated 2002, 2005 and 2007). The Local Plan 2011-2031 does not rely on the same starting point or assumptions, but this common understanding is important to the overall context for the spatial strategy. The Local Plan 2011-2031 provision for a minimum 6,700 dwellings (at an annual average of 335 dwellings per annum) represents a step-change from this historic position.

- 5.58. By definition the target is a minimum, due to the nature of sites and sources of supply that are specifically considered likely to comprise the elements of provision. By extension, the target is also indicative, on the basis that proposals for individual schemes may be subject to change or delay (e.g. an increase or reduction in density). These are matters for monitoring and review in the first instance and dealt with later in this paper. However, the key point is that based on both long-term delivery trends and the significant upturn in output which the plan supports over years 0-10 (from adoption) in particular, the provision remains the maximum that can realistically be expected to be achieved.
- 5.59. Having identified full objectively assessed housing needs, the capacity of the Borough to accommodate a given levels of development must also be considered in order to achieve sustainable policies. Luton is the most densely populated Borough across (for example) Bedfordshire, Hertfordshire and Buckinghamshire, and largely built up, relying on previously developed land for the provision of most of its new housing. Its peripheral areas contain Green Belt land, retention of which the Government regards as important (paragraph 79 onwards of the Framework). In many respects, its characteristics reflect those of outer London Boroughs or locations immediately adjacent the London urban fringes e.g. Crawley, Watford. Annex A of this Background Paper sets out a comparative assessment against other nearby urban locations in terms of land use, population density and dwelling mix.
- 5.60. The Luton Local Plan does not in principle need to make apologies in setting out that this is the correct approach to follow as part of the long-term strategic planning for the area. It is an approach which has successfully been followed by a number of other authorities with similar spatial characteristics. Recently, for example, the Crawley Local Plan (adopted December 2015) was found sound following Examination after advancing a ‘supply-led’ requirement which reflects the compact nature of the borough, its limited land availability and significant environmental, airport noise and safeguarding constraints². The Watford Core Strategy Local Plan (adopted 2013) represents a plan prepared in similar circumstances; although in that case not backed by a full objective assessment of housing needs).
- 5.61. The precise context for plan-making is clearly unique to each area and the merits of specific approaches will vary to some degree. For example Luton’s relative strategic role

² See: <http://www.crawley.gov.uk/pw/web/pub270981> for Inspector’s Report

and priorities in terms of jobs, retail, leisure and open space etc. will not be the same as those in Crawley, Watford or any other area. However, it is clearly logical that the outcomes for plan-making may be similar in the Luton context.

- 5.62. What is important, however, is that the approach clearly demonstrates how a ‘no stone left unturned’ approach has been taken to urban capacity; and how this continues to be reflected through an iterative process of evidence-gathering and monitoring.
- 5.63. How these matters have been thoroughly researched and addressed through the gathering and analysis of evidence in accordance with national policy and guidance and the wider strategic priorities for the area forms the remainder of this section.

Background to the Luton Strategic Housing Land Availability Assessment

- 5.64. The Luton Strategic Housing Land Availability Assessment (April 2015) (HOU004A) comprises the main element of the evidence base to determine the level of housing provision identified in the Luton Local Plan 2011-2031. It identifies a deliverable and developable supply of around 5,800 dwellings for the remainder of the plan period. Coupled with completions since 2011 and extant permissions for smaller schemes (under the SHLAA threshold of five units) this supports the identification of the target to provide for 6,700 units over the plan period. The total supply identified from these sources is around 6,900 dwellings, giving approximately 3% contingency above the total requirement that the Local Plan intends to deliver.
- 5.65. The SHLAA has been updated regularly and this Background Paper presents a comparative analysis using information from the 2009 assessment. This aims to indicate the extent of efforts made to establish the capacity for housing that can be realistically identified and also the evolving information for specific allocations identified in the Local Plan. This analysis is presented in Annex B. A number of key points from the comparison are as follows:
- The 2009 SHLAA assessed 129 sites for development, of which 104 were considered deliverable or developable. The 2015 SHLAA assessed 238 sites, of which 127 were considered deliverable or developable;
 - The 2009 SHLAA identified a deliverable and developable capacity of up to 6,971 dwellings of which 914 units have either been completed or the site lost to non-residential uses. By comparison the SHLAA 2015 identifies a deliverable and developable supply of 5,814 dwellings;
 - The estimates in the 2009 SHLAA were exaggerated due to the expectation of deliver 2,595 dwellings solely from the strategic sites at Napier Park and Power Court. If adjusted to current developer estimates (see Annex B), the 6,971 dwellings identified in 2009 effectively reduces to 5,576 dwellings.
- 5.66. In summary, the 2015 SHLAA has assessed a broader range of sites and identified a significantly greater deliverable and developable supply than previous work. It is also

significant that the supply currently identified more than replaces the capacity removed since the 2009 assessment was undertaken (following completion or loss to other uses), helping to maintain supply over the longer plan term. This allows the SHLAA to set a challenging but deliverable trajectory for housing supply providing the basis for provision through the Local Plan.

- 5.67. The Luton SHLAA contains an extensive range of sites, many of which have seen little or no development activity but which have nonetheless been subject to repeated detailed assessment. This paper further sets out below how this extensive evidence has supported the strategy set out in the Local Plan in terms of identified Site Allocations and other land expected to come forward. However, it is important to set out at this stage that the approach taken is fully consistent with national guidance, which highlights key points of relevance to the complex urban environment in Luton.
- 5.68. The viability evidence for the Luton Local Plan 2011-2031 demonstrates the complex outcomes and considerations for development across the town. Principally, this reflects that notwithstanding local policies on density, 'high-rise' development above 5 storeys often appears less viable due to associated development costs and constraints and market demand. This ultimately has an effect on reducing development potential, albeit circumstances appear capable of changing rapidly or on a site-by-site basis, further reinforcing the justification for the regular updates and approach taken in the Luton SHLAA.

Relationship to Previous SHLAAs and Future Updates

- 5.69. National Planning Practice Guidance (NPPG ID: 3-007-20140306) recognises that assessments of land availability should ideally take place for the area identified as the Strategic Housing Market Area or Functional Economic Market Area. The history of joint-working in the local area is such that for several years a SHLAA was prepared jointly for South Bedfordshire and Luton Borough Councils.
- 5.70. Although this resource was not subsequently updated jointly since the authorities decided to withdraw and not continue preparation of a Joint Core Strategy for the two areas, this nevertheless highlights a degree of common understanding of matters affecting land availability across the wider area. This history of joint working has also provided a baseline against which Luton Borough has continued to take forward, update and review the methodology for its own SHLAA.
- 5.71. Luton Borough Council recognises that as part of ongoing monitoring and review, there is significant potential benefit in completing an up-to-date assessment of land availability across the Luton HMA comprising all of Luton Borough and part of Central Bedfordshire.
- 5.72. In the first instance, monitoring outputs and a review of the SHLAA within Luton Borough will be important to ensure that the assumptions informing the level of housing provision remain robust. For example, outputs from the 2015/16 monitoring

period will help to benchmark performance against the SHLAA, Local Plan housing trajectory and other sources of supply. This will also help to update the SHLAA to a base-date of April 2016, with an update to be provided prior to the start of the Examination Hearings. It is not anticipated that this will have a significant effect on overall capacity, but may help to clarify specific impacts such as changes to Permitted Development Rights.

- 5.73. In the context of preparation of the Growth Options Study and potential review of the Local Plan, comparable information across the functional Housing Market Area would enable a common understanding of the existing position and factors affecting land availability in the adjoining urban areas of Dunstable and Houghton Regis, which have many characteristics in common with Luton.
- 5.74. This work may also support additional resources being identified to refine the assessment of housing (and employment) land availability within Luton Borough. Coupled with an up-to-date understanding of potential sites identified in rural areas, this has scope to give a more complete understanding of land availability across the housing market and inform the best combination of sites to meet overall needs, including any unmet needs for Luton Borough arising under the Duty to Cooperate.
- 5.75. Luton Borough Council anticipates that future outputs from the emerging Growth Options Study will provide the basis to take forward refinements to the assessment of land availability, if required. This will include a comparative scan of capacity across the study area, including the Luton urban area. It is not considered likely that the outputs from this work in itself will materially alter the strategy as set out in the Pre-Submission Luton Local Plan.
- 5.76. However, this will provide an important input to monitoring, including reviewing the delivery assumptions for capacity already identified in the Local Plan and the possibility of other sources contingency or additional capacity. However, such outputs will also continue to be reviewed as part of the wider strategic priorities for plan-making (such as Luton's sub-regional employment role) and work under the Duty to Cooperate.

v. Comparing Past and Future Housing Delivery

5.77. This Background Paper complements the Luton Strategic Housing Land Availability Assessment to provide a detailed analysis of the sources of housing provision identified in the Luton Local Plan 2011-2031 and how these contribute towards the most appropriate requirement for the strategy as a whole.

5.78. The overall provision for 6,700 dwellings identified from 2011 – 2031 (335 dwellings per annum) must be viewed in the context of several factors including:

- Historic Rates of Delivery and Market Activity (pre-2011);
- The identification of sites to comprise a deliverable and developable supply;
- Delivery since the start of the Local Plan Period; and
- The Development Trajectory for identified provision

5.79. The trajectory set out at Appendix 5 of the submission Local Plan is effectively ‘front-loaded’ for the plan at the point of adoption. In accordance with national guidance, this represents a step-change in the expected rate of housing delivery and looks to significantly boost the supply of housing (see Paragraph 5.57 for other plan-making comparisons). The annual average rate of completions anticipated in the first five years upon adoption (405 dwellings per annum) and 10-year trajectory to 2026 (461 dwellings per annum) are both significantly higher than the 20-year requirement and the historic record of delivery since 2001 or from the start of the plan period in 2011.

5.80. The lower delivery rates in the last five years are largely an effect of the SHLAA methodology. Most of Luton’s supply is from specific, identified sites that are either deliverable (first five years) or developable (mostly years 6-10 of the trajectory). Due to the built up nature of Luton, there are few broad locations for housing delivery that would otherwise be considered to come forward towards the end of the plan period.

(see over)

	Historic Delivery	Last Five Years³	Remaining Plan Period
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³ Figures are based on recorded delivery 2011/12 to 2013/14 and projected delivery 2014/15 and 2015/16 as set out in Appendix 5 of the Submission Plan

Delivery Period	01/02 – 05/06	06/07 – 10/11	11/12 – 15/16	16/17 – 20/21	21/22 – 25/26	26/27 – 30/31
Average Completions Per Annum Within Stated Period	349	384	349	405	517	110
	2001/2 - 2013/4					
	357					
	2004/5 – 2013/4			2016/17 – 2025/26		
	403			461		
	2004/5 – 2008/9 ⁴					
486						
Local Plan 2011-31			335 per annum (6,700 total from Policy LP2)			

Table 2: Comparison of Local Plan (Appendix 5) Housing Trajectory Delivery Rates With Relevant Historic Periods

5.81. This is considered to accord with national guidance as a whole, in-particular the need to provide realistic assumptions for delivery and in terms of setting out projected supply:

The National Planning Policy Framework asks local planning authorities to identify a supply of specific developable sites or broad locations for growth in years 6-10 and where possible for years 11-15. (NPPG ID: ID: 3-032-20140306)

5.82. Within Luton, the pattern of land use and overall area that might be considered for development (taking into account the nature of administrative geography and limited areas of open space) limits the consideration that can be given to ‘broad locations’ later in the plan period. Identification of additional sites later in the plan period is likely to rely on significant assumptions on future availability or release from other uses which is not presently supported by the evidence base or information from the development industry.

5.83. In-line with national guidance, the judgements regarding whether a site should be considered deliverable over the plan period should be made in the plan-making context when looking at matters such as suitability and availability. It is not therefore considered appropriate to identify additional sites that might compromise the overall objectives of the Local Plan or where insufficient evidence is available to support their development simply to maintain projected rates of delivery from earlier in the plan period.

5.84. Given the type and location of sites contributing to the housing provision in the Luton Local Plan, the majority could be considered developable in the ‘6-10’ year period even where extant constraints need to be overcome e.g. in terms of availability or performance in the market. This is not true for all sites, for example where anticipated dates for relocation of existing uses occur later in the plan period; or where delivery of strategic locations such as Power Court are expected to be phased over several years.

⁴ Represents the five years prior to the economic downturn

- 5.85. The approach in the Luton Local Plan also looks to support an aspirational but realistic level of delivery as early in the plan period as possible. As well as specific site allocations in Policy LP15, policy coverage for broad areas such as the Town Centre, Creative Quarter and High Town look to support and stimulate delivery across broad locations.
- 5.86. The potential start-date and phasing of individual sites is also based on specific information, but assessments nevertheless indicate that in principle a range of individual sites, often in close proximity, could start at similar points.
- 5.87. The trajectory should be viewed in the context of historic records of delivery, particularly noting that in previous periods (for example between 2009 and 2014) estimates of delivery assumed in earlier SHLAAs appear to have been somewhat optimistic. However, this includes the impact of the sharp economic downturn and longer-term depressed rates of development activity. The Local Plan trajectory also includes estimates of delivery from a much broader range and type of sites.
- 5.88. As a result, the trajectory is considered to be challenging but one which can realistically be achieved in the context of a recovering economy and the support for development provided by the Local Plan policies as a whole. The fact that the projected delivery profile is concentrated in the early and middle parts of the plan period is appropriate based on individual site assessments and also provides flexibility and contingency over the 15-year horizon to offset delayed delivery at any specific locations.

Monitoring and Calculation of Five Year Land Supply:

- 5.89. The level of housing provision set out in the Luton Local Plan 2011-2031 must be regarded as a minimum but it is the greatest capacity that can realistically be planned for at the point of preparing the plan. The Local Plan identifies provision from a broad range of sources and it is therefore to be expected that the monitoring of delivery through different routes will evolve from the point at which the plan is adopted. For example, the Local Plan sets the context to record delivery on a variety of spatial bases. This includes monitoring as part of the relatively detailed pattern of delivery anticipated in the High Town area (as part of the High Town Masterplan and sites assessed in the SHLAA) as well as other strategic locations where estimates can be provided based on current site information but the scale, location and type of activity may fluctuate. The plan also provides the basis to record specific development activity associated with site allocations under Policy LP15.
- 5.90. National planning practice guidance highlights that as part of assessing land supply (including calculating the five year housing land supply) *“local planning authorities should consider both the delivery of sites against the forecast trajectory and also the deliverability of all the sites in the five year supply”* (NPPG ID: 3-033-20150327). At the point at which the Local Plan was finalised and upon adoption there is likely to be a high degree of correlation between these two sources. However, past records of delivery demonstrate that this relationship may evolve and change over time based on the prospects and activity for specific sites.

- 5.91. The rate of delivery for years 2026 to 2031 appears low at 110 dwellings per annum. However, this is in-line with the methodology for identifying deliverable and developable sites set out above. It should also be considered highly likely that the Local Plan will be reviewed by this stage and additional supply potentially identified. Another factor is that the trajectory is not adjusted for a 'lapse rate' or discounting projected delivery. This is appropriate in principle, as all of the sites identified can realistically expect to be delivered over the plan period; although some locations have a history of unimplemented consents historically these were either renewed or alternative schemes granted.
- 5.92. For comparison, if the trajectory set out at Appendix 5 of SUB001 'under-delivered' by 20% compared to the 10-year output expected from 2016 to 2026, delivery across Luton would still reflect long-term average rates of housing output. However, the 'shortfall' against the Local Plan trajectory would need to be made up in the final five years (2026 to 2031), setting a more challenging annual average of around 255dpa at the end of the plan period. This is considered to provide a reasonable degree of flexibility.
- 5.93. The preparation of future Authority Monitoring Reports and updates to the SHLAA will contribute to an iterative process of monitoring delivery against the provision set out in the Local Plan. Given the high degree of site-specific information used to inform the estimates for provision in the Local Plan, future updates are essential to understand where the pattern of delivery accords with previous estimates. Alternatively, where alternative sites are recorded through the planning process (and not currently part of the housing trajectory) monitoring as a whole provides a pragmatic context to determine where they might offset delays or substitute for other sites e.g. those within the same strategic location such as the Creative Quarter but which are unlikely to become available as previously expected.
- 5.94. Crucially, this will provide a framework to support monitoring and review of the plan as a whole, for example the relationship between land uses and the need for other infrastructure such as provision for additional education facilities or open space. In the event that delivery of any of the sites key to the overall strategy is delayed, it will be important for such a review to ensure that the Local Plan continues to provide support for them to come forward (barring a significant change in circumstances such as availability).
- 5.95. In the first instance, the Luton Local Plan supports monitoring against the overall average annual requirement. This annual requirement is based on the estimate for provision derived by assessing the broadest possible range of sites over the full horizon of the 2011-2031 plan period and taking account of the overall strategy. However, the trajectory for the Local Plan also takes account of the realistic phasing over which this delivery is expected to be achieved. This provides flexibility and contingency both in the later years of the trajectory, but also the possibility of acknowledging additional sources

of supply and their relationship with the overall strategy and contribution to sustainable development.

5.96. Calculated on this basis, the housing trajectory in the Luton Local Plan provides for a five year supply of housing significantly in excess of the annualised requirement with an allowance for a 5% buffer as required by NPPF Paragraph 47.

vi. Approach to Windfall Allowances in the Luton Local Plan

5.97. The Luton Local Plan 2011-2031 does not include an estimate or allowance for windfall within the overall level of provision identified. The justification for this is as follows.

5.98. Paragraph 48 of the NPPF states that:

“Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply”

5.99. Windfall can also be considered in years 6-15 where justifiable (NPPG ID: 3-24-20140306).

5.100. It is significant that the SHLAA (HOU004A) now assesses sites of 5 dwellings and larger in-line with the NPPG. This includes a number of sites with expired planning permission but where there is some evidence of continued availability. Annex B of this Background Paper provides further details of the delivery and non-delivery rates from sites that were identified in previous SHLAAs (from 2009); rates of non-implementation have been historically high but sites remain assessed as part of SHLAA capacity. This reflects that information often reveals that sites remain vacant or available and remain suitable for development in principle. In addition, there is a high incidence of sites renewing or updating consents despite not being delivered. As an indication, 52 sites were identified as ‘deliverable’ in the 2009 SHLAA, but were not delivered in the last five years as previously anticipated. At least 14 already show an updated estimate of capacity and alternative expectation for delivery based on new planning consent, contact with the developer or identification in the Town Centre Offices Study, compared with the 2009 assessment.

5.101. This accords with the approach of the Local Plan in not including a lapse rate or discount rate to the identified provision, based on a realistic estimate that these sites would come forward over the whole plan period.

5.102. In addition, a number of the sites are at the early stage of coming forward (e.g. based on information from Call for Sites and Employment Land Review evidence). The SHLAA has taken great steps to identify and assess all potentially deliverable and developable sites

and therefore it is not considered that providing an estimate of further sites coming forward would comprise a reliable source of supply.

- 5.103. National guidance requires plan-makers to take account of historic rates of development in a number of ways both as part of assessing needs and projecting future supply. In terms of assessing supply, evaluation against longer-term trends is considered more robust to cover both peaks and troughs in the housing market (NPPG ID: 3-035-20140306). Conversely, adjusting the assessment of need for market signals should take account of past rates of development and aim to increase future supply to reflect the likelihood of under-delivery of a plan.
- 5.104. The trajectory for the Local Plan takes account of both circumstances by providing for an annual average rate of delivery broadly consistent with historic trends but supporting delivery for a step-change in output earlier in the plan period. This is also consistent with the adjustment for market signals in the SHMA Update 2015.
- 5.105. Based on the delivery of housing as anticipated through the Local Plan, the context does not provide support for identifying an element of 'windfall' supply additional to the provision identified for 6,700 dwellings. National guidance states that this may be justified within the five year supply where a local planning authority has compelling evidence that such sites have consistently come available over the plan period and would provide a reliable source of supply. Alternatively, broad locations identified within years 6-15 of the plan period may also comprise an element of windfall supply (NPPG ID: 3-24-20140306).
- 5.106. The housing trajectory for the Luton Local Plan provides for an estimate of supply across a wide range of sites, many of which are not covered by any specific policy or site specific allocation. These findings are based on specific site assessments, which cumulatively help to identify the capacity for various broad locations as well as overall supply, in addition to provision from specific strategic allocations. The range and overall scale of specific potential supply identified is greater than previous work for site identification and assessment. This reflects refinements in the overall evidence base and SHLAA methodology, including taking account of the latest national guidance.
- 5.107. This is considered to provide the most reliable estimate of supply. An additional allowance for 'windfall' would not be based on the same robust assumptions and could undermine the reliability of the overall estimates of supply. The overwhelming majority of recent historic completions (since 2009) arise from sites identified in previous assessments of supply (the 2009 SHLAA). One should also take account of the additional sources of supply identified in the SHLAA (for example due to the completion of more recent evidence on Town Centre Offices) and the fact that having adjusted for capacity estimates on the largest strategic sites, the 2014 SHLAA provides significantly more capacity than previous assessments. There is no compelling evidence to include assumptions for additional components of 'windfall' capacity that might not be captured in these estimates.

5.108. Completions that might be regarded as ‘windfall’, having not been assessed in previous SHLAAs, are typically small-scale. Relevant exceptions include completions from sites coming forward under Permitted Development. For example, approximately 25% of all completions recorded as ‘windfall’ between 2009 and 2015 comprise a single site of 134 units brought forward through the Prior Approval process for office-to-residential conversion. It should be noted that although not included in the 2009 SHLAA, this location was identified in more recent SHLAAs prior to coming forward for development (for example see the section on Permitted Development in this Background Paper). It already forms part of the identified housing provision in the Local Plan – see SHLAA ID452 in the Appendix 5 Housing Trajectory.

5.109. In theory a ‘windfall’ allowance for smaller sites could potentially be justified in addition to the provision set out in the Local Plan. However, the overall scale of this allowance is likely to be limited, particularly in terms of its contribution to overall supply per annum. Any such allowance is likely to be capped to sites only providing four or fewer dwellings. This is significant as it represents locations below the threshold for identification and assessment in the SHLAA. The contribution that smaller sites make to strategic locations such as High Town and the Creative Quarter has already been assessed in terms of recent delivery and extant permissions. Analysis reveals that these represent a very minimal contribution to capacity in these areas and do not materially affect the policy approach to these locations. This provides additional justification for not including and specific ‘windfall’ allowance.

5.110. Such schemes are not considered to be central to the plan-led strategy and achieving the objectives of the plan as a whole. In effect they represent additional supply to the figures identified in the Plan, but do not in principle represent a substitute or contingency for the main locations identified. However, the overall reliability of this source of supply is likely to be generally limited, particularly taking account of Paragraph 48 of the NPPF and accepting that some delivery (such as that from residential gardens) should not form part of any estimate of ‘windfall’. Future provisions for monitoring will take account of the overall scale of delivery from these sources, including their cumulative contribution and whether there is any overall impact on matters such as infrastructure capacity. If necessary these matters can be considered as part of any future review of the Local Plan.

vii. Relationship Between Permitted Development and Identified Housing Provision

- 5.111. The Luton Local Plan does not include a specific allowance for additional housing provision expected to arise from Permitted Development Rights. The justification for this is provided within the evidence base for the plan as a whole and subsequently because recent iterations of the SHLAA have taken account of the implications of delivery from these sources. The main scope for capacity arising through this route comprises office-to-residential (B1a to C3) conversion.
- 5.112. The starting point for this approach is provided through the Luton Borough Council “Review of Town Centre Office / Business Premises for Alternative Re-Use” (May 2013) (CEN004) prepared by Peter Brett Associates. This identified that potential re-use for residential accommodation overwhelmingly represents the most economically attractive possibility to provide an alternative use for office floorspace. The study looked assessed the scope for redevelopment or conversion across 31 separate sites identified in the town centre area on the following basis:
- “This is achieved through testing two scenarios. The first scenario assumes the current status quo that a developer/land owner requires planning permission to convert/redevelop their site from offices to residential. The second scenario assumes the developer/owner proceeds with residential conversion through permitted development rights. This is reflected in lower professional fees and some buildings yielding a lower number of units because conversion will be within the existing building fabric thus restricting development.”* (CEN004 Paragraph 1.9)
- 5.113. The high level assessments also took account of factors including the potential viability of redevelopment (including benchmarks for Existing Use Value and residential values in the town centre) and where appropriate looked at the relationships with neighbouring buildings and uses – for example where parts of a larger adjoining building might need to be utilised to enable the most effective redevelopment of the site. The overall viability of locations covered in the study was considered to be marginal and likely to inhibit development in some cases.
- 5.114. The study as a whole reveals the complexity of providing housing capacity through Permitted Development sources. Many of the sites identified are for fewer than five units and fall outside the scope of the SHLAA. Following Paragraph 5.110 above such sites are not considered to be strategically significant in scale and do not justify the identification of a windfall component. In addition, a number of the other sites looked at have been vacant for a number of years, such as Whitbread House. In such cases, sites may also benefit from planning permission and / or their suitability has already been explored in previous SHLAAs (see SHLAA ID401 identified in the Appendix 5 Housing Trajectory in SUB001).
- 5.115. The comparison from the 2009 and 2014 SHLAA reveals that some town centre office locations previously regarded as ‘deliverable’ in 2009 have since changed in status and are no longer expected to provide housing – for example where they have returned to

commercial use or been lost to other non-residential uses. There is often limited historic evidence of delivery from these locations.

- 5.116. Implications following the introduction of Permitted Development Rights also include their impact on sites that have planning permission. For example, landowners and developers may consider allowing existing consents to lapse to take advantage of the savings in terms of planning obligations (including affordable housing) from taking forward a scheme under Permitted Development Rights. This may have knock-on effects in terms of delaying a start on-site or changing the overall number of units to be provided. These effects may be accentuated following the Government's recent announcements to make Permitted Development Rights for B1(a) to C3 conversions permanent.
- 5.117. The converse is also possible where owners and developers initially consider bringing forward a scheme under Permitted Development Rights. These intentions may change, for example based on market circumstances (where returns could be greater from development secured through full planning permission), where changes to the external building are greater than first envisaged or where a comprehensive scheme can best be achieved by incorporating parts of a larger building or neighbouring uses. This may also result in delays to a site coming forward, including delays to estimates of delivery where the site was already included in the SHLAA.
- 5.118. It should also be kept in-mind that requests for Prior Approval may be refused, particularly following the more stringent tests introduced as part of the Government's decision to extend Permitted Development Rights. Luton Borough Council may also consider other mechanisms such as an Article 4 Direction to remove such Rights in certain instances in the future. For example, this could include instances where sites have an unacceptable impact in highway terms or the amenities of future occupiers may be prejudiced e.g. through locations in an AQMA or exposure to noise⁵.
- 5.119. Other instances of residential development through Permitted Development Rights are expected to be more limited and it would be inappropriate to predict such activities as a component of overall supply. For example, change from the upper floors of retail (A1) uses to housing are likely to fall below the threshold of five units applied in the SHLAA. Conversion of storage and distribution uses (B8) to housing will be affected by the Prior Approval process taking account of the relationship with surrounding uses and impact on future amenity, particularly given the high intensity uses and high occupancy of the majority of industrial and employment areas within the town.
- 5.120. The approach to take account of the implications for Permitted Development in the Local Plan 2011-2031 is considered to be a positive and pragmatic in the context of the

⁵ In-Particular this takes account of Luton Borough Council's intention to declare a new Air Quality Management Area for Stuart Street and parts of Dunstable Road in the Town Centre. See: http://consult.luton.gov.uk/portal/lbc/environmentandplanning/declaration_of_an_air_quality_management_area_on_stuart_street_part_of_dunstable_road_and_parts_of_adjoining_roads

PBA Study and assessments provided by the SHLAA. The decision to increase the housing provision identified through the Local Plan from 5,700 to 6,700 dwellings between the August 2014 and October 2015 consultations in-part⁶ reflects these changes at the national level. A number of additional sites have been added to the SHLAA and where sites were already identified assessments have been updated based on the latest evidence. Many of these locations already have consent and some have recorded completions in the most recent monitoring years.

- 5.121. It is therefore appropriate to monitor future trends in delivery from Permitted Development sources as part of the provision for housing identified in the plan as a whole. This will allow maximum account to be taken of the relationship with the overall trajectory, including where delivery is on sites already identified. Monitoring can also take account of the relationship of Permitted Development to specific locations (e.g. High Town and the Creative Quarter) and identify where activity under Permitted Development Rights might frustrate activity at other locations (for example due to impact on the local housing market). Future updates of the SHLAA will also help to assess these trends in terms of the most realistic estimates of capacity from sites arising through Permitted Development.
- 5.122. It will be possible, for example, to monitor the delivery of housing against the forecast trajectory both with and without taking account of any additional supply that has specifically arisen through Permitted Development Rights.
- 5.123. Monitoring and Review will allow account to be taken of where, if anywhere, supply through Permitted Development Rights is additional to the provision identified in the Luton Local Plan as a whole. This may support the wider review of aspects of the Local Plan, in terms of the relationship of such sites with infrastructure provision (for example the availability of school places) and also any long-term effects on the availability of office floorspace and the balance between homes and jobs.
- 5.124. It will also be necessary to have regard to the mix of units delivered through Permitted Development Rights against the overall requirements in the SHMA (see Policy LP15) as part of informing any future review of the plan, taking account that this will not have been determined within the scope of traditional development management powers. To a greater degree, mix is likely to reflect the capacity of the building for conversion (e.g. location of service space and bathrooms) and market demand and may have implications for the longer-term sustainability of housing stock, such as meeting the needs of family-sized households with young children.

viii. Relationship with Student Population and Provision for Specialist Accommodation:

⁶ The September 2015 Committee Report recommending the Pre-Submission Luton Local Plan 2011-2031 be published for consultation identified approximately 300 dwellings from this source now identified in the SHLAA and providing justification for an element of the increased housing provision.

- 5.125. A proportion of the supply identified within the overall provision identified for the Local Plan 2011-2031 (including as part of a number of the allocations identified as part of Policy LP15) comprises accommodation for students under Use Class C2.
- 5.126. The evidence base and local context of the town supports this approach.
- 5.127. As a whole, the policies in the Luton Local Plan 2011-2031 look to provide clear direction to ensure the sufficient provision of suitable and sustainable accommodation well-suited to the needs of student occupiers over the life of the plan period. The background for this approach draws upon the approach taken in determining proposals under the existing development plan by the Council (as well as taking into account comments and evidence from consultees from individual applications) and takes into account national policy and guidance and having regard to the wider evidence of housing need set out in the latest Strategic Housing Market Assessment.
- 5.128. National policy in the NPPF sets out at Paragraph 50 that good planning should look to provide for a mix of housing based on a number of factors including current and future demographic trends and the needs of different groups in the community. Whilst not specifically listing student accommodation amongst different interest groups, the examples provided are not exhaustive. Paragraph 50 of the NPPF also sets out that the size, type, tenure and range of properties than planning looks to provide should be based on the requirements identified in particular locations and to reflect local demand.
- 5.129. Paragraph 51 of the NPPF is also relevant to the extent that it seeks to ensure empty buildings are brought back into use. Planning permission should normally be granted for the change of use from B-Use commercial buildings to residential use and any associated development subject to an identified need for additional housing in the local area and providing that there are not strong economic reasons why development would be inappropriate.
- 5.130. To a large degree, the extent of supply is determined by the range of sites considered potentially suitable to include elements of student accommodation and in-part reflects the fragmented nature of non-residential land uses (many of which are or were previously redundant or under-occupied) in close proximity to both the town centre and higher education facilities towards the south and east of the town in-particular. In recent years, delivery of specialist student accommodation has allowed some sites to be brought forward that have traditionally been unattractive or unviable as traditional residential uses.
- 5.131. The National Planning Practice Guidance provides further instruction on the contribution that student accommodation may make towards the overall housing requirement and achievement of sustainable planning outcomes. NPPG ID-3-038 sets out that in relation to assessing land supply:

“All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double-counting.”

5.132. In order to reflect the importance of student accommodation as a specialist category of supply contributing to the wider housing market, the NPPG in relation to this matter was updated in March 2015 specifically introducing a new sub-section for such supply:

“Local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Student housing provided by private landlords is often a lower-cost form of housing. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Plan makers are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside of university-provided accommodation. Plan makers should engage with universities and other higher educational establishments to better understand their student accommodation requirements.” (NPPG ID-2a-021)

5.133. The change in guidance primarily reflects the benefits student accommodation can provide to the wider supply of housing. However, recent Caselaw also emphasises the need for clarity in terms of the relationship between the provision of specialist accommodation and the calculation of objectively assessed housing need. For example, in *Exeter City Council vs. SSCLG, Waddeton Park Ltd. and The RB Nelder Trust* [2015] EWHC 1663 (Admin), the Local Planning Authority’s claim was dismissed partly due to the findings in terms of the correctness of counting student accommodation as part of the supply to deliver overall needs in those circumstances. Paragraph 20(i) of the judgment noted:

“The objective assessment of need for housing (and thus the housing requirement) in this case did not therefore take into account the fact that, for Exeter, the unmodified housing projection figure would be inappropriate as it would not reflect the peculiar circumstances of the student population in Exeter.”

5.134. Such circumstances cannot be said to apply within the context of Luton. Available evidence demonstrates that the opposite is likely to be the case. Specifically, the University of Bedfordshire has submitted representations to a number of planning applications in the recent past highlighting that there is not a specific need for further specialist accommodation for students in the town (see Annex C). In principle this reflects the relatively recent expansion of the University and completion of a significant volume of new accommodation (predominantly for first-year students) in 2008. It is reflects the particular demographic make-up of the institution and the high proportion

of students living locally. There is no evidence of further plans for expansion generating a specific needs for specialist accommodation. The University’s comments can also, validly, be seen in the context of their own commercial interests with respect to the accommodation which it owns and manages.

5.135. Nevertheless, it is apparent that a reasonable proportion of the student population rent housing privately on the open market. Furthermore, recent activity within the development industry would suggest that there is a commercial market for more specialist accommodation. This provides a firm context for such accommodation potentially releasing traditional housing back into the wider residential market. Policy LP17A provides the basis for the Local Plan to support such developments in appropriate circumstances.

5.136. The total student population is much higher than those likely to need specialist accommodation or private market housing. This is because the total count of students includes those still at schools and a high proportion of people in further education living with parents (and presumably studying locally). However, it is possible that the secondary information identifying the population in non-residential accommodation (C2) (and therefore excluded from the population in households) under-estimates the total population living in facilities such as University Halls of Residence. The recent expansion of the University (and completion of new bedspaces around 2008) may not yet be reflected in the latest projections, taking into account matters such as the accuracy of Census data and when the units were first occupied.

5.137. Data from the 2001 and 2011 Census shows a significant growth in the student population, and indicates that there was no population in ‘Halls of Residence’ communal establishments in 2001. This seriously further questions the robustness of the 2001 Census, as a number of Student Halls of Residence were operated by Universities in the town during 2001. The population in communal establishments shown in 2011 is also significantly lower than the approximately 1,100 bedspaces the University states it provides. The majority of these trends will therefore be reflected in projections for future change in population and households, not the growth of institutional populations.

Student accommodation: 2001 Census	All categories: Age 4 and over	Age 18 to 19	Age 20 to 24	Age 25 and over
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Living in a Household (All Categories)	45572	2377	3788	1552
Living with parents	40067	1800	1178	140
Living in a communal establishment: Total	97	22	49	11
Living in a communal establishment: University (for example halls of residence)	0	0	0	0
Living in a communal establishment: Other	97	22	49	11
Living in all student household	2267	306	1486	374
Student living alone	645	96	325	217
Living in other household type	2593	175	799	821

Table 3: Student Population by Accommodation Type – 2001 Census

Student accommodation: 2011 Census	All categories: Age 4 and over	Age 18 to 19	Age 20 to 24	Age 25 and over
All categories: Student accommodation	50,947	3,588	5,363	4,460
Living with parents	41,044	2,735	1,694	193
Living in a communal establishment: Total	540	233	219	62
Living in a communal establishment: University (for example halls of residence)	500	225	215	58
Living in a communal establishment: Other	40	8	4	4
Living in all student household	3,843	363	1,995	1,458
Student living alone	730	42	208	463
Living in other household type	4,790	215	1,247	2,284

Table 4: Student Population by Accommodation Type – 2011 Census

5.138. By comparison, the CLG 2012-based household projections for Luton assume a constant institutional population of 663 people aged 15-34 not included as part of the population expected to form households. This too is lower than the capacity in existing University accommodation.

5.139. In effect, the proportion of the total population estimate expected to form households may be slightly lower than that assumed in the SHMA. This could have the effect of slightly reducing the identified level of objectively assessed housing need. The impact is likely to be minimal, but given there are also no future plans for large-scale expansion of the University, this reinforces the point that any additional accommodation delivered (including Use Class C2) should be counted towards the overall requirement for housing identified.

5.140. The Council also takes an approach which monitors the completion of specialist student accommodation based upon the nature of units provided. Essentially, where buildings are of modular construction and comprise larger 'flats' which include several bedrooms (sometimes as many as 7 or 8) alongside shared living and kitchen space then these are calculated as a single unit. In reality, one such unit may release more than one existing

dwelling back onto the market; or meet the needs of more than only newly forming household derived as part of the objectively assessed housing need.

5.141. Where accommodation is provided as 'single occupancy' one-bed flats or bedsits then these are typically counted as separate units. Such examples may make less of a contribution in releasing existing housing back to the market, albeit that there is a projected growth in single person households over the plan period. Such examples are also relatively less common.

5.142. It should also be kept in mind that the Plan must be read and applied as a whole. In-particular, policies LP15 and LP17A set out that the requirements set out in the latest SHMA should be taken into account as part of assessing and determining future proposals. The Local Plan supports monitoring and review if the specific requirements for student groups were to change over time.

ix. Relationship Between Local Plan and Provision for Older Person's Housing:

5.143. The Luton and Central Bedfordshire SHMA (Update) 2015 identifies that the projected population of older residents in non-residential institutions or communal establishments increases in absolute terms as it is calculated as a fixed proportion (or percentage) of the total population within the 75+ age groups. In Luton (as with the country as a whole) the population profile is expected to age significantly over the plan period.

5.144. The growth in this element of the population anticipated to require accommodation in communal establishments is additional to the calculation for objectively assessed housing needs. For Luton, the baseline population projections indicate an increase of 352 people aged 75+ living in communal establishments at the end of the plan period in 2031. However, Paragraph 2.85 of the SHMA correctly highlights that it is also necessary to consider the most appropriate types of housing in the context of future plans for delivering care and support for older people.

5.145. National guidance (in-particular NPPG ID: 3-037-20150320 and 2a-021-20160401) recognises that many older people may not want or need specialist accommodation but that providing for an appropriate mix of general housing (e.g. bungalows, adaptable homes) can free up under-occupied homes to meet wider market needs. On this basis, accommodation in residential institutions for the elderly can be counted towards the housing requirement. However the SHMA is clear that if fewer older people than projected were to live in communal establishments (for example due to closures or reformed Health and Social Care), the needs of any additional people in the household population should be added to the objectively assessed need for Luton.

5.146. In-line with this guidance, the SHMA (see Fig. 80 of HOU003c) provides a more detailed breakdown on the need for specialist accommodation for the elderly, including that which can be provided as particular types of general housing (e.g. Leasehold Schemes

for the elderly) where delivery is likely to better meet the needs of specific groups and benefit meeting needs across the wider housing market by freeing up property. This evidence justifies Policy LP18 of the Luton Local Plan in looking to support these types of accommodation.

5.147. The delivery of all specialist accommodation to meet the needs of older people will therefore be counted against the housing requirement and considered as part of both the wider assessment of the needs identified in the SHMA and the number of spaces available in communal establishment (Use Class C2 accommodation).

6. CONCLUSIONS

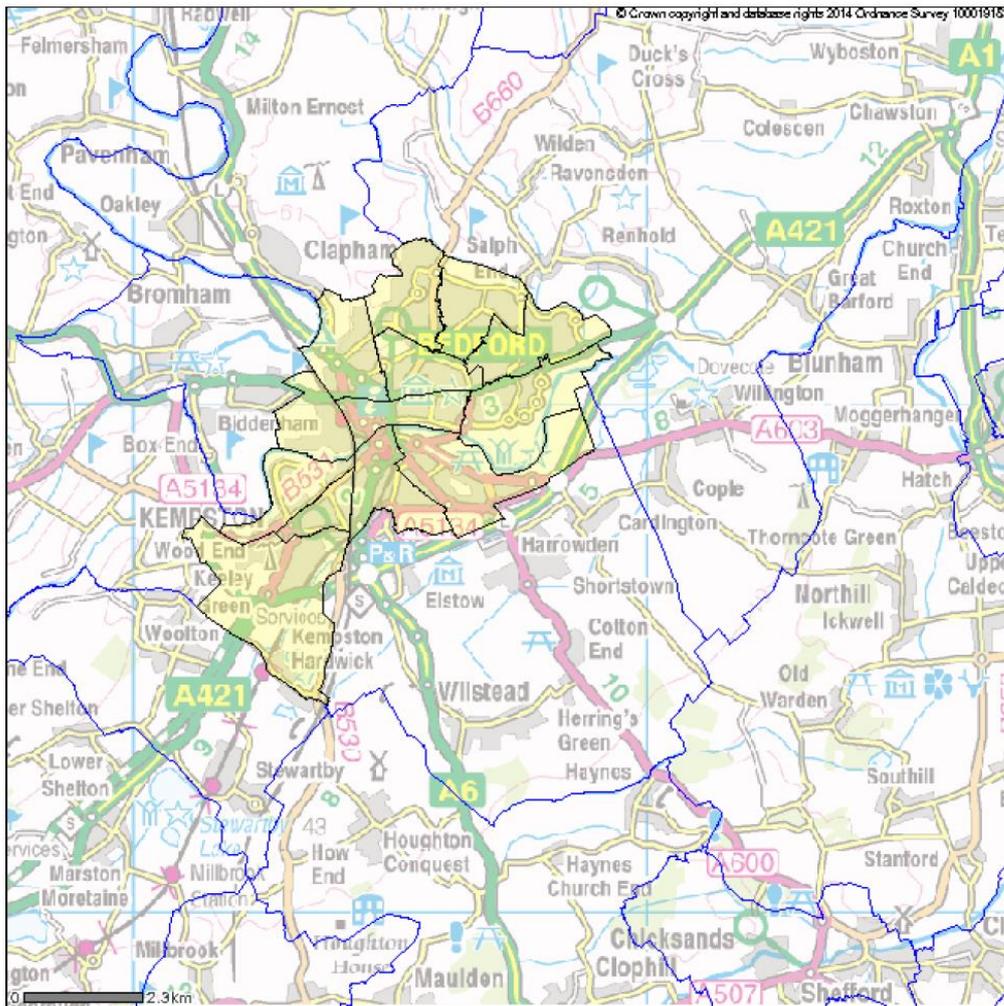
- 6.1. The approach to identifying the level of housing provision set out in the Luton Local Plan 2011-2031 has directly followed the two-stage process required by national guidance on this subject. The overall requirement for the Luton Functional Housing Market Area and the specific projections for the Luton Borough area are derived from a full objective assessment of housing needs.
- 6.2. This is fully in accordance with national guidance, including appropriate testing for local sensitivity and a significant upward adjustment for market signals. There was a significant need for this evidence in the context of previous plan-making regimes covering Luton and the surrounding sub-region (including Central Bedfordshire). The total requirement identified through this evidence represents a significant uplift to previous assessments of need for this area and reflects the significant drivers of growth locally in terms of migration and demographic change.
- 6.3. This evidence sets an important benchmark for the housing requirements of Luton, but also helps to inform the scale and pattern of delivery that would be needed to provide for full objectively assessed housing needs. This is particularly true in terms of the relationship with Dunstable and Houghton Regis, forming a larger conurbation and when viewed against historic delivery rates. It is clear that a significant boost to housing supply – in accordance with national policy – will be essential to meet these requirements. In-turn, it is inconceivable in principle how this can be achieved without large scale provision of land (including greenfield sites) for residential development.
- 6.4. However, the Luton Local Plan and its evidence base make a significant and immediate contribution to setting out the strategic priorities for plan-making. Particularly in relation to a realistic and achievable trajectory and overall provision of land for housing, the Local Plan is founded upon the long-term preparation of evidence to identify the deliverable and developable sources of supply. Analysis of the town, and comparison with other areas, reveals a high degree of competition for different land uses and the need to balance the different roles and functions of the town – such as for retail, leisure and employment. This understanding is consistent with previous assessments, and analysis against other comparable areas, indicating the appropriateness of the conclusion that Luton is unable to meet identified needs within its own administrative area.
- 6.5. Understanding of previous delivery rates, delays and changes to estimates for strategic locations (e.g. land at Napier Park) goes hand-in-hand with the preparation of policies to specifically support achieving development at these locations as well as providing further support to specific housing allocations and important policy areas such as High Town.
- 6.6. The Luton Local Plan is therefore based on evidence which identifies more potentially deliverable and developable sites than previous work; sets out a challenging trajectory to deliver these sites in the middle of the plan period; and provides an appropriate

benchmark for monitoring and review. Care has been taken to ensure that specific locations and rates of delivery are consistent with the objectives for the plan as a whole; with appropriate provision for flexibility over the longer plan period should delivery be delayed on particular schemes for any reason.

- 6.7. For these reasons the Local Plan should be considered aspirational and positively prepared. The Council commits to updating evidence to an April 2016 baseline in the 2016 SHLAA to inform the Local Plan Examination and review assumptions regarding expected rates of delivery and whether the sources and levels of supply are consistent with the provision in the identified Local Plan. The Council has confidence in its approach and that when viewed over longer-term horizons the level of provision identified is aspirational but realistic and strikes the appropriate balance in terms of supporting the Local Plan and priorities of the area as a whole.

ANNEX A: LUTON AND COMPARATOR AREAS:

- A.1A The Borough of Luton comprises a complex built environment which represents a climate for the type and scale of development opportunities that differs markedly from many of the conditions in surrounding areas. In principle the town offers very few longstanding opportunities for development on greenfield land and there an intensive use and high degree of pressure on the remaining areas parkland and amenity open space. There is intensive competition between the different existing and potential purposes of land which is already developed and this is an important material consideration to ensure that the Local Plan strategy as a whole supports an appropriate mix of uses.
- A.1B This background highlights the complexity against which the assessment of land availability in Luton is undertaken. It represents the principle reason that Luton Borough Council has consistently produced a Strategic Housing Land Availability Assessment annually (also containing the calculation for housing land supply).
- A.1C A key part of this technical paper looks to draw comparisons with other urban areas which have similar characteristics and highlight common aspects for plan-making and determining an appropriate spatial strategy. As each place is by definition unique, identifying the most appropriate comparator areas in terms of scale, form and function is not straightforward. This is further complicated where potentially suitable 'urban' areas form part of a larger overall District with substantial rural hinterland – for example the town of Bedford. It is also apparent that even small differences in urban boundaries, the extent of other policy designations (such as Green Belt) and ongoing influence from previous Regional Plan policies will have large effects on the nature of growth and distribution of development opportunities.
- A.1D For the purposes of this review, Luton is compared against Stevenage, Watford and a modelling of the Bedford and Kempston urban area using Middle Super Output Area (MSOA) geographies (see Fig. A.1 below). Stevenage and Watford are particularly suitable as they represent distinct administrative areas. For Bedford, most relevant data from the 2011 Census is available to MSOA level although some information on the wider economy can only be accessed for the whole Borough. Such analysis provides the background context to understanding the different drivers for plan-making and the approach to preparing the relevant evidence base. It is also useful to highlight the specific approach taken by the Luton Local Plan and how this reflects the unique aspects of the plan area.



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Fig. A.1 – Bedford MSOAs Comprising Comparator Urban Area

Table A.1 – Population and Population Density in Luton and Comparator Areas				
Area:	Luton	Stevenage	Watford	Bedford (urban area)
Population (2011)	203,201	83,957	90,301	101,066
Land Area (ha)	4335	2596	2142	3395
Density (persons per ha)	46.9	32.3	42.1	29.77
Density (persons per km ²)	4687	3234	4216	2977
Dwellings (2011)	76,014	35,569	37,404	43,304
Dwellings per ha (gross)	17.53	13.70	17.46	12.76

Land Use Statistics (Generalised Land Use Statistics) – Enhanced Basemap (2005)

Table A.2 – Land Use Statistics (total ha) for Luton and Comparable Areas (Source: Generalised Land Use Statistics – Enhanced Basemap 2005)				
Area:	Luton	Stevenage	Watford	Bedford (urban area)
Total Land Area (ha)	4314.437	2541.238	2130.234	3351.099
Area Domestic Buildings (ha)	403.256	196.664	182.203	244.853
Area Non-Domestic Buildings (ha)	220.951	104.129	109.362	160.941
Area Road (ha)	558.344	306.21	272.191	358.732
Area Path (ha)	32.683	61.807	17.363	27.658
Area Rail (ha)	24.617	15.751	26.084	16.643
Area Domestic Gardens (ha)	1357.567	534.135	642.93	738.012
Area Greenspace (ha)	1288.17	1112.676	683.407	1354.125
Area Water (ha)	6.987	9.766	21.051	157.776
Area Other Land Uses (ha)	421.861	200.1	175.644	292.363

Table A.3 – Land Use Statistics (% of Land Use) for Luton and Comparable Areas (Source: Generalised Land Use Statistics – Enhanced Basemap 2005)				
Area:	Luton	Stevenage	Watford	Bedford (urban area)
Total Land Area (ha)	4314.437	2541.238	2130.234	3351.099
Area Domestic Buildings (%)	9.30%	7.70%	8.60%	7.3%
Area Non-Domestic Buildings (%)	5.10%	4.10%	5.10%	4.8%
Area Road (%)	12.90%	12.00%	12.80%	10.7%
Area Path (%)	0.80%	2.40%	0.80%	0.8%
Area Rail (%)	0.60%	0.60%	1.20%	0.5%
Area Domestic Gardens (%)	31.50%	21.00%	30.20%	22.0%
Area Greenspace (%)	29.90%	43.80%	32.10%	40.4%
Area Water (%)	0.20%	0.40%	1.00%	4.7%
Area Other Land Uses (%)	9.80%	7.90%	8.20%	8.7%

Dwelling and Tenure Mix

Area:	Luton	Stevenage	Watford	Bedford (urban area)
<i>Unshared Dwellings (Total)</i>	73969	34879	36474	40772
<i>House or Bungalow – Total (%)</i>	78.7%	80.2%	66.9%	77.0%
<i>House or Bungalow – Detached (%)</i>	13.0%	11.6%	10.6%	18.3%
<i>House or Bungalow – Semi-Detached (%)</i>	40.6%	18.3%	28.5%	34.2%
<i>House or Bungalow – Terraced (%)</i>	25.1%	50.3%	27.7%	24.5%
<i>Flat or Apartment – Total (%)</i>	21.1%	19.7%	33.1%	22.9%
<i>Flat – Purpose Built (%)</i>	17.8%	18.1%	26.7%	17.3%
<i>Flat – Converted / Shared House (%)</i>	2.6%	0.9%	5.0%	4.5%
<i>Flat – Part of Commercial (%)</i>	0.8%	0.7%	1.4%	1.0%

Area:	Luton	Stevenage	Watford	Bedford (urban area)
<i>All Households</i>	72493	34898	36681	41060
<i>Owned Outright (%)</i>	25.1%	22.2%	24.4%	28.0%
<i>Owned with Mortgage (%)</i>	35.1%	36.1%	37.2%	31.2%
<i>Shared Ownership (%)</i>	0.4%	1.2%	1.2%	0.8%
<i>Social Rented – from LA (%)</i>	10.7%	22.8%	4%	2.4%
<i>Social Rented – Other (%)</i>	5%	5.6%	12.3%	17.0%
<i>Private Rented – Landlord or Agency (%)</i>	21.3%	10.4%	18.9%	18.1%
<i>Private Rented – Other (%)</i>	1.4%	1%	1.2%	1.4%
<i>Living Rent Free</i>	1%	0.7%	0.8%	1.2%

Area:	Luton	Stevenage	Watford	Bedford Borough
<i>Date of Last Published Document</i>	<i>April 2015</i>	<i>June 2015</i>	<i>October 2008</i>	<i>January 2011</i>
<i>Deliverable / Developable Supply Identified</i>	5,814	7,610 ⁷ (of which 3,180 'Town Centre' Regeneration)	3,404 ⁸	13,883 ⁹
<i>Of which Greenfield</i>	660	3,628	0 ¹⁰	Unknown
<i>Of which Brownfield</i>	5,154	3,982	3,404	Unknown
<i>Of Which Sites 500+</i>	1,200	4,512 ¹¹	2,181	10,260
<i>Proportion of Supply Identified Allocated or Proposed for Specific LP Allocation</i>	3,620 ¹²	5,604	2,181 ¹³	Unknown

A.1E Analyses of the above trends in data highlight important considerations for the approach in the Luton Local Plan and the value of the latest SHLAA in informing the strategy as a whole. This assessment of trends in secondary data and site identification evidence in nearby towns (as well as their application in providing allocations for adopted or emerging plans) highlights key differences with the role and character of Luton. Two key points are relevant.

A.1F Firstly, Luton has a significantly lower proportion of potentially suitable land for housing identified on greenfield sites or as part of large scale opportunities on sites delivering more than 500+ units. This is particularly important in the context of sites identified through the SHLAA exercise being incorporated into emerging plans. In Luton, only two such sites (Napier Park and Power Court) provide 'strategic' scale allocations of 500+

⁷ Deliverable and Developable supply excludes existing commitments in supply pipeline. Total including completions and commitments from sites already in housing land supply equals 9,391

⁸ Figures cover 2010-2021 and exclude 2,478 recorded or anticipated completions over the period 2001-2010 and potential additional capacity of 2,749 beyond 2021

⁹ Plus 756 dwellings from sites otherwise 'suitable' but where there was no known developer intention or availability for development

¹⁰ Total of 107 units on greenfield land not included in supply estimate but found suitable

¹¹ Excluding composite of 1154 from 'Other Town Centre Sites' but including Matalan and Stevenage Leisure Park (2,026 of total shown)

¹² Does not include Strategic Locations with multiple sites e.g. Castle Quarter, High Town.

¹³ Comprising 681 dwellings at General Hospital Site (based on Outline consent) and 1,500 dwellings at Watford Junction. Other smaller sites may be carried forward from the Local Plan 2000.

units – comprising approximately 49.6% of the total. In Watford, the two sites at ‘Watford Junction’ and the former General Hospital make up over 64% of the total identified in the SHLAA.

- A.1G Sites comprising over 500 units made up over 74% of the deliverable and developable supply in the previous Bedford SHLAA. It is not possible to simply compare these with sites subsequently allocated or proposed for allocations as many of the locations such as the extension at Wixams represent long-standing commitments. However, the comparison highlights the substantially greater extent of greenfield opportunities in the town of Bedford.
- A.1H At Stevenage, the emerging Local Plan relies on a very high proportion of larger sites of 500-plus dwellings and use of greenfield land from the total of potentially deliverable or developable sites identified in the SHLAA as part of the evidence base. The 5,604 dwelling capacity identified in the Pre-Submission Draft Local Plan is effectively the ‘residual’ of the original SHLAA capacity having removed land considered undeliverable, necessary for other uses, unsuitable in Green Belt terms or likely to deliver fewer dwellings than initially assessed. Sites that have gained consent through the planning process (and now comprise existing commitments) have also been removed.
- A.1I This ‘residual’ SHLAA capacity identified in the emerging Local Plan along with existing commitments and previous completions in the plan period is sufficient to meet the full objectively assessed housing needs for Stevenage claimed by the plan’s evidence base. As a result the emerging plan relies on the identification of very few smaller sites to deliver the remaining requirements for the plan period. Whilst it is conceivable that some additional development might come forward on sites currently considered unavailable or less suitable the risks to the overall strategy are reduced due to the identification of large, predominantly greenfield allocations.

ANNEX B: COMPARISON WITH 2009 SHLAA AND BREAKDOWN OF CAPACITY ESTIMATES

B.1A The approach to the delivery of housing within the Borough through the Local Plan is driven forward and shaped by the SHLAA. This supports an ongoing process of site assessment and identification, incorporating methodological revisions and taking account of relevant changes in the evidence base and policy considerations. It also helps to highlight complex patterns of delivery and pressures for competing land use. In short, the SHLAA provides the most appropriate evidence to support the delivery of sites and locations that are key to the success of the strategy as well as providing the best of estimate of the housing requirement that is appropriate and capable of being achieved over the plan period.

Initial Comparison with the 2009 SHLAA

B.1B SHLAAs prepared since 2009 have used a consistent 'Unique ID' for each entry on the database. Sites are inevitably removed if they are built out and completed (whether for residential or other uses). Occasionally sites 'merge' or become part of a larger overall scheme. In this case, it is still possible to treat the old IDs as 'relic' entries and ensure that they are matched with the latest information.

B.1C It is therefore possible to produce a full reconciliation between the 2009 SHLAA and the April 2015 SHLAA which supported preparation of the Pre-Submission Luton Local Plan. In the first instance this reveals that the vast majority of all sites assessed in the 2009 version remain relevant for current assessments of land.

Count of 2009 SHLAA Capacity	SHLAA (HOU004) Status (at April 2014 Baseline)						
	Complete	Deliverable	Developable	Suitable	Unsuitable	Non-Residential Completion	Grand Total
2009 SHLAA Status							
deliverable	28	21	20	13		4	86
developable		3	10	2	3		18
not developable	1	1		1	9	2	14
Suitable			5	4	2		11
Grand Total	29	25	35	20	14	6	129

Table B.1 – Status of Sites Identified in 2009 SHLAA against 2015 SHLAA (Count of Sites)

B.1A All sites with statuses in 2014 except 'Complete' or 'Non-Residential Completion' continue to be assessed. 94 or 129 sites assessed in 2009 remain in the April 2015 SHLAA. This comprises nearly 73% of the original total.

B.1B This generally relates to the very 'patchy' records of residential development activity; or occasionally that there has been some change between non-residential uses but the site is still assessed in case there is a likelihood of further land use change (e.g. from vacant site to car park but still a potential redevelopment site).

B.1C This presents a significant challenge to ensuring that the most appropriate sites are identified, supported and can contribute towards delivery of the strategy as a whole.

B.1D Where development has not taken place there is a general consistency in terms of the overall potential for development. For example, of the sites previously assessed as deliverable in 2009 most still remain either “deliverable or developable” at 2015. Many still have an active planning status such as an existing consent or undecided application. However, there has clearly been slippage on a number of sites – for example where consent has lapsed; viability has worsened; additional constraints have been identified; or a site can no longer be considered available. Issues may in-fact be a combination of these factors.

B.1E It has therefore been a key objective in preparing the Local Plan to ensure that such circumstances are avoided and the policies are put in place to support the delivery of sites that are key to the overall strategy. The identification of specific housing allocations through Policy LP15 of the Luton Local Plan is an important element of the policy framework to ensure that this is achieved. This can be demonstrated by identifying sites previously identified from the 2009 SHLAA included as allocations within the Local Plan, and their capacity for housing:

2009 SHLAA Status	Count of Local Plan Allocations	Sum of Capacity (# homes)
Deliverable	9	736
Developable	3	157
Suitable	5	271
Grand Total	17	1164

Table B.2 – Sites Identified In 2009 SHLAA included as Policy LP15 Housing Allocations

B.1F The majority of sites identified as allocations were previously considered “Deliverable” in the 2009 assessment. However, various factors have demonstrably prevented development taking place. Whilst in some cases the sites may have existing consent or have active applications within the development management process, Allocation is considered essential to safeguard the opportunities within the plan period.

B.1G Of equal or greater importance is the range of allocations arising from sites previously assessed as “Suitable” for housing but with no realistic prospect of delivery or clarity that constraints to development (whether physical, environmental, infrastructure or policy) could be overcome. In identifying allocations, the Local Plan acknowledges the evolution of evidence for such locations, which includes matters such as increased developer or landowner interests, recommendations from Employment Land Review evidence or other commitments for delivery. This demonstrates that the Local Plan process has actively sought to bring forward opportunities for housing.

B.1H It should be noted that the Capacity Assessment from the 2014 SHLAA may differ from those in the 2009 SHLAA for a number of reasons. These might relate to changes in the planning status of sites (e.g. a revised assessment of capacity following an expired permission or new information from developers) or reflect the most realistic estimate necessary to enable delivery (e.g. taking account of viability or retained areas for other uses).

B.1I In addition to taking forward historic information for the identification and assessment of land for housing, the evidence base for the Local Plan has allowed a more comprehensive strategy to be established. This has involved the assessment of a significant number of additional locations which make up the remainder of the allocations proposed in Policy LP15 of the Plan:

2009 SHLAA Status	2014 SHLAA Status		Sum of Capacity (# homes) (from 2014 SHLAA)		Total Capacity
	Deliverable	Developable	Deliverable	Developable	Total
Not Identified	8	10	544	712	1256

Table B.3 – Local Plan (Policy LP15) Housing Allocations Not Identified in the 2009 SHLAA

B.1A The only row of this table indicates that these additional sites were not previously identified in the 2009 SHLAA. The basis for identifying these additional locations can be found within the main SHLAA document, but in summary reflects the positive approach to reviewing the SHLAA methodology in-line with revised national policy and guidance and taking account of new local evidence.

B.1B Whilst some of the sites are active in the development management process, many others are longer-term prospects and reflect a relationship with the wider policy options and strategy within the Local Plan – for example the relocation of open space, community facilities and regeneration of Public Sector Land. The fact that none of the sites were identified in 2009 and many are (or were) in other active uses reflects the dynamic market for development within Luton. However, it is of significant value that ‘Call for Sites’ exercises in 2010 and 2012 assisted with initial identification for some of the locations.

B.1C Whilst it is clearly the intention to promote and safeguard the opportunities within the proposed allocations, the phasing estimates provided by the 2014 SHLAA provide an accurate and realistic projection for delivery based on particular circumstances. Coupled with support from the policy allocations themselves, the evidence base provides a stronger foundation to predict delivery patterns:

	Projected Deliver Period (Year 1 = 2014/15)			Grand Total
	1 to 5	6 to 10	10 to 15	
Local Plan 2011-2031 Allocations	780	1395	245	2420

Table B.4 – Expected Delivery Profile of Policy LP15 Housing Allocations (Plan Period from 2016 onwards)

Major Strategic Allocations

B.1D It should also be noted that the Local Plan Allocations in Policy LP15 do not include the significant total of housing to be provided as part of sites identified which comprise specific strategic locations identified in the strategy. The largest individual sites related to Policies LP8, LP9 and LP11. The table also indicates that these sites were identified previously identified in the 2009 SHLAA along with their capacity in the 2014 SHLAA and anticipated start date:

Site name and address	2009 SHLAA Status	Projected Deliver Period (Year 1 = 2014/15)		Grand Total	2009 SHLAA Capacity (Information Only)
		1 to 5	6 to 10		
Napier Park, Kimpton Road	Deliverable	600		600	1,795
Power Court	Developable	600		600	800
Station Quarter	Deliverable		375	375	375
Total		1200	375	1575	2970

Table B.5 – Comparison of Major Strategic Allocations Between 2009 SHLAA and 2015 SHLAA

High Town

B.1E Beyond these large sites, other specific policies in the Plan are supported by a strategy developed from careful preparation and assessment of sites in the SHLAA evidence base. One key example is the ‘High Town’ Action Area, which provides for the delivery of around 750 new units in the plan period. Approximately 50 of these units have already been completed or represent supply from very small sites (fewer than five dwellings). The remaining elements of supply are derived from locations and sites specifically identified and assessed in the SHLAA. The number of sites and their estimated delivery timeframe is shown below, with a separate table reflecting the policy capacity:

2009 SHLAA Status	Projected Deliver Period (Year 1 = 2014/15)			Grand Total
	1 to 5	6 to 10	10 to 15	
Deliverable	4	3	1	8
Developable	1	3	2	6
Not Identified in 2009 SHLAA	4	1		5
Grand Total	9	7	3	19

Table B.6 – Count of Sites in High Town Policy Area Compared with Status in 2009 SHLAA

2009 SHLAA Status	Projected Deliver Period (Year 1 = 2014/15)			Grand Total
	1 to 5	6 to 10	10 to 15	
Deliverable	123	165	46	334
Developable	97	65	86	248
Not Identified in 2009 SHLAA	112	6		118
Grand Total	332	236	132	700

Table B.7 – Capacity of Sites in High Town Policy Area Compared with Status in 2009 SHLAA

B.1F This breakdown identifies a number of key aspects. Firstly, a number of the sites comprising the High Town Policy Area / sub-location have been identified through work since 2009. This has helped to ensure that the Local Plan looks to provide the maximum capacity realistically achievable from the sub-location. Secondly, the large number of sites means that many do not meet the criteria for specific policy allocation (delivering 25+ units) and are therefore better-assisted by policy support for the wider High Town Area. Finally, a high proportion of the sites had already been identified as ‘Deliverable’ in the 2009 SHLAA. Looking back historically is beneficial in terms of reflecting the constraints on delivery in the area and limited development to date. Therefore, this evidence-based support for the High Town area through the Local Plan as well as other initiatives such as the High Town Masterplan provides the optimum framework for a realistic but deliverable strategy for the opportunities in the location.

Creative Quarter

B.1G On the same basis, the SHLAA informs the following estimate of capacity within the ‘Creative Quarter’ (Policy LP11) in addition to the large site at the Station Quarter (375 units) also falling under this designation – giving a total estimate of 577 Units. The approach to supporting delivery can be compared with that at High Town described above.

2009 SHLAA Status	Projected Deliver Period (Year 1 = 2014/15)			Grand Total
	1 to 5	6 to 10	10 to 15	
Deliverable	22	14	59	95
Developable			101	101
Not Identified In 2009 SHLAA	6			6
Grand Total	28	14	160	202

Table B.8 – Capacity of Sites in Creative Quarter Policy Area Compared with Status in 2009 SHLAA

Castle Quarter

B.1H The ‘Castle Quarter’ is the final sub-location referred to within the Local Plan, as part of Policy LP3 for the Town Centre. However, there is no specific dwelling estimate for this area given in the Plan. However, the contribution that the area might make towards overall housing land supply has been driven through the SHLAA evidence. The area as a whole has an estimated capacity of around 330 dwellings; however this is based on a more limited number of sites (4 in total):

2009 SHLAA Status	Projected Deliver Period (Year 1 = 2014/15)		Grand Total
	1 to 5	6 to 10	
Deliverable		219	219
Not Identified In 2009 SHLAA	14	96	110
Grand Total	14	315	329

Table B.9 – Capacity of Sites in Castle Quarter Policy Area Compared with Status in 2009 SHLAA

- B.1I Two of these sites comprise almost 300 dwellings from this total (one historically identified in the 2009 SHLAA and another identified through more recent work). It is appropriate that the Local Plan supports these as specific allocations (and therefore part within the 2,420 total shown from Policy LP15). The remaining two sites are relatively small but provide part of the estimate for deliverable and developable supply informing the Local Plan requirement as a whole.
- B.1J The remaining housing requirement for the Luton Local Plan 2011-2031 has been derived from sites which are not identified as part of the strategy either as specific allocations meeting the criteria for Policy LP15 nor part of the strategic policy 'sub-locations' identifying a broad capacity based on SHLAA evidence. These former two categories largely reflect policy choices critical to the delivery of the overall strategy. For example, this includes support from residential development as part of the mixed-use regeneration of strategic sites and areas; and support for specific allocations delivering a scale of housing above the threshold of 25-units based on specific justification from the evidence base, SHLAA assessment and / or development management process. This ensures that the sites with the greatest potential for housing delivery have the greatest policy support; although given past records the challenge for delivery should not be under-estimated.

Non-Site Specific Estimate of Capacity

- B.1K The SHLAA provides evidence for a wide range of sites that are not part of a specific allocation or policy sub-location. These are shown in the tables below in terms of the count of the number of sites and their assessment of capacity:

2009 SHLAA Status	Projected Deliver Period (Year 1 = 2014/15)			Grand Total
	1 to 5	6 to 10	10 to 15	
Deliverable	9	8		17
Developable	1			1
not developable	1			1
Not Identified In 2009 SHLAA	32	12	1	45
Grand Total	43	20	1	64

Table B.10 – Count of Sites in Outside Strategic Policy Areas Compared with Status in 2009 SHLAA

2009 SHLAA Status	Projected Deliver Period (Year 1 = 2014/15)			Grand Total
	1 to 5	6 to 10	10 to 15	
Deliverable	159	103		262
Developable	18			18
not developable	42			42
Not Identified In 2009 SHLAA	453	130	12	595
Grand Total	672	233	12	917

Table B.11 – Capacity of Sites in Outside Strategic Policy Areas Compared with Status in 2009 SHLAA

B.1L Beyond the specific spatial strategy for key sites and rationale for individual site allocations, it remains appropriate that the Plan as a whole seeks to achieve the highest level of housing output that it realistically can.

B.1M 45 of the 64 total sites identified in this category were not identified in the 2009 SHLAA. These have an estimated capacity of 595 units, or approximately 65% of the total from this source. This demonstrates the extent to which the SHLAA has identified potentially suitable, available and achievable sites and which the Local Plan commits to delivering as part of the provision for housing. It is also relevant that the remaining sites were recorded in the 2009 SHLAA; the majority previously recognised as 'deliverable'. Although there has been little or no activity at these sites since 2009 (often contrary to previous estimates) the Local Plan commits to recognising their potential contribution to future supply where this is supported by evidence. For example, some may still have extant planning permission while others represent long-term redundant or vacant sites.

**ANNEX C: UNIVERSITY OF BEDFORDSHIRE CONSULTATION RESPONSE TO PROPOSALS UNDER
15/01075/FUL:**



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Luton Borough Council
Development Control
Town Hall
Luton
LU1 2BQ

5 October 2015

Dear Sirs,

Reference 15/01075/FUL

Site: 42 – 44 Park Street, Luton

Description: Erection of a five storey building consisting of 33 bedroom student accommodation

The University considers it has more than sufficient rooms for its students who wish to live in halls or similar purposely designated student accommodation. There is currently a large and growing surplus of this type of accommodation following a number of permissions that have been granted since 2010, some of which is currently under construction.

From a meeting held between David Gauntlett and myself on 4th November 2014 it was evident that while no policy existed, previous applications had been made and therefore approved based upon flawed assumptions about student numbers in Luton. The total number of students registered with the University is approximately 25,000, but those based at the Luton Campus is less than 10,000, many of whom are in part time study and many live at home or commute.

The new accommodation being built, whilst very pleasing to the townscape, is expensive to rent and therefore not attractive to many of our students who are highly sensitive to price.

Any decisions to grant further student accommodation in Luton is therefore unsustainable and we suggest no further planning consent for this type of accommodation is granted until demand is demonstrated to avoid the risk of the community having such specialist accommodation unoccupied and at risk of deterioration.

Yours faithfully
[REDACTED]