

Authority Monitoring Report 2017/18

May 2019

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1. Introduction

This authority monitoring report (AMR) describes plan-making and development activity in Luton between 1 April 2017 and 31 March 2018. During this period, the Luton Local Plan 2011-2031 was adopted (7 November 2017), replacing the previous Luton Local Plan 2001-2011.

While the focus of this report is the 2017/18 financial year, tables have also been included that summarise trends and total change since April 2011 (the start date of the current local plan).

Purpose of this Report

National planning practice guidance provides the following role of AMRs:

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

This information should be made available publicly. Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out what information the reports must contain. The reports can include other information, for example, the reports can draw on Infrastructure Funding Statements to highlight the contributions made by development, including section 106 planning obligations, Community Infrastructure Levy and New Homes Bonus payments, and how these have been used. (Paragraph: 073 Reference ID: 61-073-20190315)

2. Plan Progress

Local Development Scheme

The local development scheme (LDS) sets-out the scope and timings of plan-making. The most recent LDS is dated 24 January 2017. The following paragraphs identify the planning documents set-out in the LDS, the stage they have reached in their preparation and an explanation for any delays.

Luton Local Plan 2011 – 2031

The Secretary of State appointed a planning inspector to undertake the examination of the plan, which took place between July 2016 and January 2017. Following examination, a consultation on proposed modifications was undertaken between April and May 2017. This stage was not planned for in the LDS and resulted in a delay to the identified timings. Considering the responses to this consultation, the inspector issued their report in August 2017. The report states that the plan provides an appropriate basis for the planning of the borough, subject to a number of modifications being made to it.

The local plan was adopted on 7 November 2017 with the required modifications.

Table 1: Progress against the LDS (Luton Local Plan 2011-2031)

Stage	LDS 2017 timings	Actual timings
Evidence gathering and preparation	Completed	Completed June 2014
Regulation 18 consultation	Completed	June - August 2014
Consideration of consultation responses	Completed	September - November 2014
Evidence gathering and preparation	To September 2015	December 2014 - September 2015
Regulation 19 Consultation	October - November 2015	October - December 2015
Consideration of consultation responses	December 2015 - February 2016	January - March 2016
Submission	April 2016	April 2016
Examination	July 2016 - January 2017	July 2016 - January 2017
Adoption	July 2017	November 2017

Gypsy & Traveller Local Plan Part 2 2011 – 2031

As of March 2018, the initial evidence gathering and preparation stage had not completed in-line with the timings set-out in the LDS. This delay was due to the Government changing the definitions of travelling people, which required a review of previous needs assessments.

The next AMR will report on progress since March 2018.

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

Stage	LDS 2017 timings	Actual timings
Evidence gathering and preparation	April 2016 - March 2017	Completed May 2017
Regulation 18 consultation	April - May 2017	June - August 2017
Consideration of consultation responses	June - August 2017	Ongoing
Regulation 19 Consultation	September - October 2017	N/A
Consideration of consultation responses	November 2017 - January 2018	N/A
Submission	March 2018	N/A
Examination	June 2018	N/A
Adoption	December 2018	N/A

Neighbourhood Development Orders and Plans

No neighbourhood development plans or orders have been made.

Duty to Co-operate

The Localism Act 2011 introduced the duty to co-operate to maximise the effectiveness of development plans. This duty requires local planning authorities to co-operate with other local planning authorities, county councils and certain organisations as defined by the Town and Country Planning (Local Planning (England) Regulations 2012) (as amended). The requirement came into force on 15th November 2011. The National Planning Policy Framework (NPPF) (2019) explains that public bodies have a have a duty to co-operate on strategic planning issues that cross administrative boundaries.

In November 2017, we adopted the Luton Local Plan 2011-2031, which effectively ended duty-to-cooperate matters on the production of our development plan. One of the final pieces of co-operation for our plan was the publication of a joint growth options study that was signed off by Luton, Aylesbury Vale, Central Bedfordshire and North Hertfordshire councils in June 2017.

The majority of activities between April 2017 and March 2018 relate to the plans being produced by other authorities. The following text outlines the actions taken.

Bedford Borough Council

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

- May 2017: Duty-to-cooperate meeting between both authorities
- June 2017: Response issued to the Bedford borough local plan consultation
- February 2018: Duty-to-cooperate meeting between both authorities

Central Bedfordshire Council

Strategic matters include Luton's unmet housing needs (especially affordable tenures), balanced employment provision, location of new development and traffic congestion.

- April 2017: Joint Green Belt study signed off by Central Bedfordshire and Luton
- May 2017: Duty-to-cooperate meeting between both authorities
- May 2017: Comments submitted on the Central Bedfordshire draft strategic housing market assessment
- August 2017: Duty-to-cooperate meeting between both authorities
- August 2017: Response issued to Central Bedfordshire local plan consultation
- December 2017: Duty-to-cooperate meeting between both authorities
- February 2018: Response issued to Central Bedfordshire local plan examination

Dacorum, Hertsmere, Three Rivers and Watford councils

These authorities are more remote from Luton and there are no urgent, strategic cross-boundary matters to be addressed.

- December 2017: Information supplied for their joint retail and leisure study

London

We are concerned about migration from London and its ability to meet its own needs. These concerns are shared by other authorities around London.

- December 2017: Developing the East of England Local Government Association's response to the Mayor of London's Housing Strategy

Milton Keynes Council

Milton Keynes is more remote from Luton and there are no urgent, strategic cross-boundary matters to be addressed.

- June 2017: Response issued to their local plan consultation.

North Hertfordshire District Council

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

- May 2017: Discussion over proposed modifications to the Luton local plan.
- October 2017: Statement of common ground agreed between both authorities.
- November 2017 to February 2018: Attendance at North Hertfordshire's local plan examination.

Watford Borough Council

Watford is more remote from Luton and there are no urgent, strategic cross-boundary matters to be addressed.

- September 2017: Information supplied to inform their assessment of accommodation needs for travellers.

Welwyn Hatfield Borough Council

Welwyn Hatfield is more remote from Luton and there are no urgent, strategic cross-boundary matters to be addressed.

- May 2017: Statement issued of our position on housing and employment matters.

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

Community Infrastructure Levy

It is not our intention to implement the levy until market conditions and development viability have improved.

3. Housing

More data, including lists of planning applications and their build status can be found within the Strategic Housing Land Availability Assessment, December 2018. That document and other related information can be found in the 'housing' section of our [local plan evidence web page](#).

The Housing Target for Luton

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires us to declare performance against any housing target within our current local plan.

The Luton Local Plan 2001 - 2011 contained a target that arose from the Structure Plan 2011. This required that 6,200 dwellings should be completed between 1991 and 2011 within Luton.

Table 3: Housing Target 1991-2011

Target	Achieved	Surplus over 20 year target
6,200	7,014	814

The 20-year target was comfortably achieved. With the end of the plan period, and with a surplus having been delivered against it there is little reason to continue to look to this target which was based on old population forecasts.

The Luton Local Plan 2011-2031 provides a new target of 8,500 new homes across its 20-year period. This equates to an average of 425 homes per year. The table below shows that rates of development have exceeded that new target.

Table 4: Housing Target 2011-2031

Year	Net gain in homes	Cumulative gain	Cumulative annualised plan target
2011/12	490	490	425
2012/13	351	841	850
2013/14	147	988	1,275
2014/15	415	1,403	1,700
2015/16	624	2,027	2,125
2016/17	798	2,825	2,550
2017/18	873	3,698	2,975

Affordable Housing

The Luton Local Plan 2001-2011 required 50% affordable housing from sites delivering 15+ dwellings or on land greater than half a hectare. The Luton Local Plan 2011-2031 requires 20% affordable housing from developments that deliver a net gain of at least 11 dwellings or have a combined floorspace of more than 1,000sq.m.

134 homes were provided as affordable tenures in 2017/18. This represents 15% of total housing delivery.

Table 5: Affordable housing delivery since 2011/12

Year	Net housing gain	Gross affordable housing gain	% of net housing gain
2011/12	490	125	26
2012/13	351	131	37
2013/14	147	0	0
2014/15	415	14	3
2015/16	624	226	36
2016/17	798	127	16
2017/18	873	134	15
<i>Total</i>	<i>3,698</i>	<i>757</i>	<i>20</i>

Table 5 shows that 20% of net housing gain has been delivered as affordable tenures since 2011/12 and that rates of delivery vary significantly between years. It should be noted that net housing gain includes developments that are too small to be liable to provide affordable housing. The actual percentage of affordable housing delivered from sites above the policy threshold will therefore be greater than reported in the table above. Considering this, rates of 15% or greater indicate that current policies are being met.

Student Accommodation

During 2017/18, there was a net gain of 126 bedrooms built for student accommodation. These were all delivered at one site at Spring Place/ Dumfries Street.

There is extant consent for the gain of another 233 rooms. 230 of these are due to come from development at 1-11 Cumberland Road, while the remaining 3 are from additional development at Spring Place/ Dumfries Street.

There is extant consent for the loss of 153 rooms at the former university accommodation site on Eaton Green Road.

Table 6: Student accommodation delivery since 2011/12

Year	Net bedroom gain
2011/12	580
2012/13	74
2013/14	62
2014/15	147
2015/16 to 2016/17	528
2017/18	126
<i>Total</i>	<i>1,517</i>

Table 6 shows that there have been net gains every year in the number of bedrooms for students. There is no clear reason for this because there is no significant expansion at the local university.

Residential Care Homes

There was a gain of 3 rooms through the conversion of a dwelling to residential care home on Oakley Road.

There was a loss of 14 rooms as the following facilities converted to houses in multiple occupation:

- 77-79 Marsh Road (7 rooms)
- 1 Western Road (7 rooms)

Extant permission exists for a gain of 35 rooms and a loss of 31 rooms.

Table 7: Residential care home accommodation since 2011/12

Year	Net bedroom gain
2011/12	39
2012/13	0
2013/14	0
2014/15	-64
2015/16 to 2016/17	-103
2017/18	-11
<i>Total</i>	<i>-139</i>

Table 7 shows that there has been an overall loss in the number of bedrooms within residential care homes. This reflects the current approach where more people are expected and supported to live independently, rather than communally.

Permitted Development/ Prior Approvals

In recent years, the Government has extended the range of permitted development rights in order to increase the supply of new homes. These include conversions from retail and employment uses to housing and the applications are subject to a process of prior approval where a limited number of concerns can be considered.

During 2017/18, this type of development resulted in a net gain of 257 dwellings. 210 of these were 1-bed units, 44 were 2-bed units and 3 were 3-bed units.

A further 314 dwellings were under construction, while extant permissions for a further 293 had yet to commence. 537 of these are for 1-bed units, 65 are 2-bed homes and 3 are 3-bed homes and 2 are 4-bed homes.

Table 8: Dwellings from permitted development since 2011/12

Year	Net bedroom gain	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
2011/12	/				
2012/13	/				
2013/14	/				
2014/15	/				
2015/16 to 2016/17	138	76	62	0	0
2017/18	257	210	44	3	0
<i>Total</i>	<i>395</i>	<i>286</i>	<i>106</i>	<i>3</i>	<i>0</i>

Table 8 shows that a total of 395 new dwellings have been delivered through the permitted development rights. 72% of these are one-bed homes, which are not helping to meet identified needs. Data is not available before 2015/16.

4. Employment

The gain or loss of employment land and floorspace is outlined below and given in both gross and net areas. The figure for land is inclusive of the area of any buildings upon it. The figure for floorspace generally covers enclosed space within a development, usually within a traditional building space (a covered yard would not necessarily count). Multiple storeys are recorded.

Table 9: Employment land gained/lost in hectares 2017/18

Use class	Gross gain	Gross loss	Net change
B1a	0	-1.6413	-1.6413
B1b	0	0	0
B1c	0	-0.9438	-0.9438
<i>Sub Total B1</i>	<i>0</i>	<i>-2.5851</i>	<i>-2.5851</i>
B2	0.1237	-0.0975	0.0262
B8	0	-0.0902	-0.0902
<i>Total</i>	<i>0.1237</i>	<i>-2.7728</i>	<i>-2.6491</i>

Table 10: Employment floorspace gained/lost in square metres 2017/18

Use class	Gross gain	Gross loss	Net change
B1a	3,138	-13,874	-10,736
B1b	0	0	0
B1c	0	-4,481	-4,481
<i>Sub Total B1</i>	<i>3,138</i>	<i>-18,355</i>	<i>-15,217</i>
B2	1,400	-3,086	-1,687
B8	483	-1,466	-983
<i>Total</i>	<i>5,021</i>	<i>-22,908</i>	<i>-17,887</i>

Table 11: Employment land change since 2011/12

Use class	2011/12	2012/13	2013/14	2014/15	2015/16 to 2016/17	2017/18	Total
B1a	-0.2196	-0.06	-0.061	-0.61	-1.5545	-1.6413	-4.1464
B1b	0	0	0	0	0	0	0
B1c	-0.1334	-0.2674	-1.15	-0.43	-6.2941	-0.9438	-9.2187
<i>Sub-total B1</i>	<i>-0.353</i>	<i>-0.3274</i>	<i>-1.211</i>	<i>-1.04</i>	<i>-7.8486</i>	<i>-2.5851</i>	<i>-13.3651</i>
B2	6.073	-1.9168	0.66	-1.29	-17.6989	0.0262	-14.1465
B8	-4.0589	0.35	0.07	-0.37	-0.2429	-0.0902	-4.342

Table 12: Employment floorspace change since 2011/12

Use class	2011/12	2012/13	2013/14	2014/15	2015/16 to 2016/17	2017/18	Total
B1a	-5,195	1,471	-3,146	-13,089	-17,617	-10,736	-48,312
B1b	-400	0	0	0	1,426	0	1,026
B1c	-1,341	-645	-6,493	-2,460	-29,324	-4,481	-44,744
<i>Sub-total B1</i>	<i>-6,396</i>	<i>826</i>	<i>-9,639</i>	<i>-15,549</i>	<i>-45,515</i>	<i>-15,217</i>	<i>-91,490</i>
B2	16,819	-7,411	2,626	-4,971	-20,403	-1,687	-15,027
B8	-14,166	843	-6,640	-1,973	-4,926	-983	-27,845

Offices (B1a)

The highest loss of employment uses was seen in office accommodation. The highest losses of floorspace were witnessed at the following sites:

- Regent Court (-6,820sq.m.)
- Napier House (-1,194sq.m.)
- Arndale House (-1,189sq.m.)

The greatest gain (1,190sq.m.) was at 29-35 Bolton Road, where a certificate of lawfulness of existing use was issued. 11,023sq.m. was lost through the permitted development to residential uses.

Analysis:

The provision of new office floorspace lags considerably behind loss. The granting of permitted development rights allowing the conversion of offices to residential use took effect from 29 May 2013. The effect of this has been notable within Luton, especially over the time period covered by this report. The Government intended this right to help provide alternative uses for old and disused office stock that was no longer suitable for modern use. It is notable that some minor offices are being converted in this way however it is equally notable that office stock in good condition has also been lost.

Since 2011/12, 48,312sq.m. of office floorspace has been lost, with only one year seeing a net gain. This appears contrary to the local plan, which seeks to protect existing employment land until new provision has been made at strategic sites.

Research and Development (B1b)

There were no gains or losses in this use class.

Analysis:

There has been no significant change in B1(b) provision since 2011/12.

Light Industry (B1c)

The highest loss of floorspace was witnessed at 20 Charles Street (-3,272sq.m.)

There were no gains in this use class.

Analysis:

The re-development of light industrial units at Charles Street was expected and broadly in-line with the expectations of the High Town Masterplan.

Since 2011/12, 44,744sq.m. of light industrial floorspace has been lost. This appears contrary to the local plan, which seeks to protect existing employment land until new provision has been made at strategic sites.

General Industry (B2)

The highest loss of floorspace was recorded at 29-35 Bolton Road (1,990sq.m. changing to office use). This site is allocated by the local plan as designated employment land (category B).

The greatest gain was recorded at Unit 2, North Luton Industrial Estate (604sq.m.)

Many losses of B2 uses involve changes from vehicle repair workshops to MOT testing centres, which are sui generis.

Analysis:

Rates of change in B2 uses are lower than in previous years.

Since 2011/12, 15,027sq.m. of general industrial floorspace has been lost. Two years have seen net gains, which indicates that new provision is being made but not to a level that would offset losses.

Storage and Distribution (B8)

The greatest loss was recorded at 40-58 Collingdon Street (-1,000sq.m.). The premises were demolished to make way for a housing scheme. This site is allocated for residential uses in the local plan.

The greatest gain from an extension at Unit 1, The Trading Estate, Chaul End Lane (360sq.m.)

Analysis:

The net loss in B8 land represents a reduction in recent trends.

Since 2011/12, 27,845sq.m. of general industrial floorspace has been lost. Two years have seen net gains, which indicates that new provision is being made but not to a level that would offset losses. This appears contrary to the local plan, which seeks to protect existing employment land until new provision has been made at strategic sites.

Employment Pipeline

Table 13: Net employment land permissions as at April 2018

Use Class	Net Employment Land (ha)	Net Floorspace (sq.m.)
B1a	-0.2655	1,235
B1b	0	0
B1c	16.9759	67,843
<i>Sub Total B1</i>	<i>59.7104</i>	<i>110,175</i>
B2	-7.9943	56,267
B8	0.91941	55,830
<i>Total</i>	<i>52.63551</i>	<i>222,272</i>

Table 13 describes the forecast net change in employment land and floorspace if all schemes with extant planning permission are built-out. Note that the subtotal for B1 uses is greater than the sum of its parts. This is because it includes a gain of 43ha of land and 41,097sq.m. of floorspace relating to the development of Century Park. There is a

long-standing policy application to create this business park but there is no detail on the proposed break-down of B1 uses from the extant permission.

A total of 24,479sq.m. of B1a floorspace is due to be lost through the permitted development of offices to homes. Against these losses, the forecast net gain is driven by the potential for 28,330sq.m. of new office accommodation proposed at Napier Park.

There are no extant permissions relating to B1b uses.

The net gains in B1c uses are largely influenced by the build-out of the remaining land at Butterfield Green Technology Park (67,400sq.m. of floor space).

The pipeline for B2 uses is heavily influenced by 41,097sq.m. of new B2 floorspace expected at Century Park.

Gains in B8 use floorspace are largely driven by the future development of Century Park (41,097sq.m.) and Napier Park (20,250sq.m.). A total of 413sq.m. of B8 floorspace is due to be lost through the permitted development of warehouses to homes.

5. Other Development

The following information includes town centre uses, for which the National Planning Policy Framework definition has been used. The Luton Local Plan 2011-2031 defines boundaries for every centre. Main town centre uses within 300m of a frontage are defined as being on the edge of the centre.

The location of uses is relevant because national and local policies direct main town centre uses to allocated centres or their edges. Only if there are no suitable and available premises in those preferable locations can out-of-centre sites be considered.

The tables in the following pages explain which land use any floorspace was gained from or lost to. Where such a source is listed as 'extensions', this means that there was an increase (or decrease) of the same use on site (e.g. a rear extension to a shop or demolition of old structures).

Table 14: Net change in other uses since 2011/12

Year	A1	A2	A3	A4	A5	C1	D1	D2	SG
2011/12	/	/	/	/	/	/	21,172	6,570	/
2012/13 to 2014/15	-4,571	-2,208	3,499	-893	245	/	8,663	-473	/
2015/16 to 2016/17	1,366	-125	735	-882	708	3,025	29,742	2,479	44,912
2017/18	-2,526	194	1,772	-890	937	799	-11,253	-794	18,542
<i>Total</i>	<i>-5,731</i>	<i>-2,139</i>	<i>6,006</i>	<i>-2,665</i>	<i>1,890</i>	<i>3,824</i>	<i>48,324</i>	<i>7,782</i>	<i>63,454</i>

Table 14 summarises the total change in floorspace by use class since 2011/12. '/' indicates that monitoring data does not exist. Information from this table is discussed in more detail in this chapter.

Shops (A1)

There was a gross floorspace gain of 1,870sq.m. and a gross loss of 4,396sq.m. This equates to a net loss of 2,526sq.m.

The main driver of new floorspace was the phase 1 redevelopment of the Marsh Farm central area (965sq.m.).

The majority of new floorspace was provided at or on the edge of allocated centres, in-line with national and local policy.

The losses to floorspace were driven by:

- Demolition of the Purley Centre (-1,174sq.m.)
- Demolition of the former Staples shop at Castle Street (-899sq.m).

It is notable that there were no new gains in Luton town centre, only losses.

Since 2011/12, 5,731sq.m. of floorspace has been lost to other uses. This implies that access to general retail (including fresh fruit and vegetables) is decreasing.

Table 15: Gross gain in general shop floorspace 2017/18

Number of applications	Location	Floorspace gained sq.m	Gained from	Element sq.m
2	Out of centre	508	Extensions	417
			Offices	91
3	Edge of centre	218	Extensions	34
			Offices	184
3	Neighbourhood or district centre	1,144	Light Industry	125
			Dwelling houses	965
			Sui generis	54

Table 16: Gross loss in general shop floorspace 2017/18

Number of applications	Location	Floorspace lost sq.m	Lost to	Element sq.m
3	Out of centre	-570	Financial/ professional service	-45
			Hot food takeaway	-58
			Dwelling houses	-467
7	Edge of centre	-854	Hot food takeaway	-502
			Dwelling houses	-352
7	Neighbourhood or district centre	-1,741	Financial/ professional service	-100
			Restaurants and cafés	-145
			Hot food takeaway	-110
			Offices	-85
			Dwelling houses	-1,174
2	Town centre	-1,232	Financial/ professional service	-899
			Restaurants and cafés	-333

Professional and Financial Services (A2)

There was a gross floorspace gain of 967sq.m. and a gross loss of 773sq.m. This equates to a net gain of 194sq.m.

The majority of new floorspace was provided within allocated centres, in-line with national and local policy.

Although there was net gain in 2017/18, there has been a net loss of 2,139sq.m. since 2011/12. This implies that access to general retail (including fresh fruit and vegetables) is decreasing.

Table 17: Gross gain in professional and financial services floorspace 2017/18

Number of applications	Location	Floorspace gained sq.m	Gained from	Element sq.m
1	Out of centre	45	General shops	45
1	Edge of centre	96	Offices	96
3	Neighbourhood or district centre	332	General shops	100
			Extensions	140
			Dwelling houses	92
1	Town centre	494	General shops	494

Table 18: Gross loss in professional and financial services floorspace 2017/18

Number of applications	Location	Floorspace lost sq.m	Gained from	Element sq.m
1	Out of centre	-150	Dwelling houses	-150
1	Edge of centre	-48	Non-residential institution	-48
1	Neighbourhood or district centre	-57	Dwelling houses	-57
3	Town centre	-518	Hot food takeaway	-157
			Offices	-274
			Sui generis	-87

Restaurants and Cafés (A3)

There was a gross floorspace gain of 1,900sq.m. and a gross loss of 128sq.m. This equates to a net gain of 1,772sq.m.

A high proportion of new floorspace was delivered in out-of-centre locations, which does not necessarily follow national and local policy. This was mostly due to development on car parking areas at retail parks.

Since 2011/12, there have been continuous gains in both A3 and A5 uses, indicating that access to prepared meals is increasing.

Table 19: Gross gain in restaurant and café floorspace 2017/18

Number of applications	Location	Floorspace gained sq.m	Gained from	Element sq.m
3	Out of centre	721	Sui generis	721
2	Edge of centre	385	Drinking establishments	155
			Sui generis	230
5	Neighbourhood and district centres	461	General shops	185
			Dwelling houses	95
			Non-residential institution	181
1	Town centre	333	General shops	333

Table 20: Gross loss in restaurant and café floorspace 2017/18

Number of applications	Location	Floorspace lost sq.m	Lost to	Element sq.m
1	Out of centre	-93	Hot food takeaway	-93
1	Edge of centre	-35	Dwelling houses	-35

Drinking Establishments (A4)

Drinking establishments continue to be lost with no re-provision. This is consistent with recent trends.

The reduction in floorspace relates to the redevelopment of the Purley Tavern and The Compasses to residential uses.

Table 21: Gross loss in drinking establishment floorspace 2017/18

Number of applications	Location	Floorspace lost sq.m	Lost to	Element sq.m
1	Out of centre	-191	Dwelling houses	-191
1	Neighbourhood and district centre	-699	Dwelling houses	-699

Hot Food Takeaway (A5)

There was a gross floorspace gain of 937sq.m. and no losses.

Most new floorspace was delivered within or on the edge of centres, in-line with national and local policy.

Since 2011/12, there have been continuous gains in both A3 and A5 uses, indicating that access to prepared meals is increasing.

Table 22: Gross gain in hot food takeaway floorspace 2017/18

Number of applications	Location	Floorspace gained sq.m	Gained from	Element sq.m
3	Out of centre	168	General shops	58
			Restaurants and cafés	93
			Extension	17
2	Edge of centre	502	General shops	502
1	Neighbourhood and district centre	110	General shops	110
1	Town centre	157	Financial/ professional service	157

Hotels (C1)

There was a net floorspace gain of 799sq.m. and no losses.

While all of the new provision was delivered in out-of-centre locations, this is not necessarily in conflict with policy. The need for hotels in Luton is largely driven by the airport and it is reasonable that new development is located close to the origin of need.

Since 2011/12, there has been a net floorspace gain of 3,824sq.m.

Table 23: Gross gain in hotel floorspace 2017/18

Number of applications	Location	Floorspace gained sq.m.	Gained from	Element sq.m.
4	Out of centre	799	Extension	330
			Assembly and leisure	469

Non-residential Institutions (D1, including schools and places of worship)

There was a gross floorspace gain of 2,850sq.m. and a gross loss of 14,103sq.m. This equates to a net loss of 11,253sq.m.

The main drivers behind the increase in floorspace are:

- Expansion of Challney High School for Boys (999sq.m.)
- Conversion of the first floor of Arndale House from offices to a medical clinic (1,189sq.m.)

The main drivers of losses are:

- Demolition of Stopsley High School (-10,812sq.m.)
- Demolition of the Bramingham Centre (-1,958sq.m.)

The demolition of Stopsley High School followed new-build re-provision on the same site. The associated gain was reported in 2016/17.

Since 2011/12, there has been a net floorspace gain of 48,324sq.m, which is mainly the result of school expansions.

Table 24: Gross gain in non-residential institution floorspace 2017/18

Number of applications	Location	Floorspace gained sq.m	Gained from	Element sq.m
4	Out of centre	1,206	Dwelling houses	35
			Extensions	1,171
2	Edge of centre	53	Extensions	53
4	Neighbourhood or district centre	354	General shops	127
			Dwelling houses	167
			Extensions	60
2	Town centre	1,237	Financial/ professional service	48
			Office	1,189

Table 25: Gross loss in non-residential institution floorspace 2017/18

Number of applications	Location	Floorspace lost	Lost to	Element sq.m
2	Out of centre	-12,770	Dwelling houses	-1,958
			Extensions	-10,812
3	Neighbourhood or district centre	-780	Restaurants and cafés	-181
			Dwelling houses	-526
			Sui generis	-73
1	Town centre	-553	Dwelling houses	-553

Assembly and Leisure (D2)

There was a gross floorspace gain of 361q.m. and a gross loss of 1,155q.m. This equates to a net loss of 794sq.m. The level of loss is significantly greater than previous, recent years.

The delivery of new assembly and leisure uses in out-of-centre locations is not necessarily in-line with local and national policy.

Since 2011/12, there has been a net gain of 7,782sq.m, which is mostly the effect of a recent trend for trampoline parks.

Table 26: Gross gain in assembly and leisure floorspace 2017/18

Number of applications	Location	Floorspace gained sq.m.	Gained from	Element sq.m.
2	Out of centre	297	Extensions	297
1	Edge of centre	64	Extensions	64

Table 27: Gross loss in assembly and leisure floorspace 2017/18

Number of applications	Location	Floorspace lost sq.m.	Lost to	Element sq.m.
2	Out of centre	-970	Dwelling houses	-415
			Sui generis	-555
1	Town centre	-185	Dwelling houses	-185

Development of Its Own Kind (sui generis)

There was a gross floorspace gain of 20,961sq.m. and a gross loss of 2,419sq.m. This equates to a net gain of 18,542sq.m.

The biggest driver of new floorspace was the ongoing enhancement of London Luton Airport (18,191sq.m.). This has been the case since 2011/12.

While most new development occurred in out-of-centre locations, sui generis uses include a wide variety of development types that are not appropriate within centres (e.g. MOT testing stations).

Table 28: Gross gain in sui generis floorspace 2017/18

Number of applications	Location	Floorspace gained sq.m.	Gained from	Element sq.m.
11	Out of centre	19,906	General industry	658
			Residential institutions	235
			Dwelling houses	722
			Small houses in multiple occupation	100
			Extensions / other sui generis	18,191
2	Edge of centre	512	Offices	180
			Residential institutions	332
3	Neighbourhood or district centre	138	Dwelling house	57
			Non-residential institution	73
			Extensions / other sui generis	8
2	Town centre	405	Financial/ professional service	87
			Dwelling house	318

Table 29: Gross loss in sui generis floorspace 2017/18

Number of applications	Location	Floorspace lost sq.m.	Lost to	Element sq.m.
1	Out of centre	-260	Restaurants and cafés	-260
2	Edge of centre	-615	Dwelling houses	-615
3	Neighbourhood or district centre	-998	Dwelling houses	-990
			Extensions / other sui generis	-8
2	Town centre	-546	Dwelling houses	-546

6. Key Findings

Housing

The old housing targets of the Luton Local Plan 2001-2011 were exceeded. The new targets from the Luton Local Plan 2011-2031 are being met.

Compared to the 50% target from the Luton Local Plan 2001-2011, there has been a significant under-provision of affordable housing. Rates of delivery are, however, broadly in-line with the 20% policy expectation in the new Luton Local Plan 2011-2031.

Significant volumes of student accommodation continue to be delivered despite there being no obvious growth in student numbers.

Losses in the number of rooms at residential care homes continue in-line with the approach for more people to live independently.

Permitted development rights are delivering a significant amount of 1-bed homes that do not meet identified needs.

Employment

Net losses continue across all types of employment uses bar B1b (research and development), which saw no changes. This appears contrary to the local plan's ambition to retain existing stock until new provision has been delivered in strategic locations.

The majority of B1a (office) losses were through permitted development rights. A further 24,479sq.m. of floorspace is forecast to be lost through these rights in the coming years. This indicates an imbalance between the number of jobs and homes, contrary to the expectations of the local plan.

The majority of B1c (light industry) losses were due to expected re-development in High Town.

The majority of B2 (general industry) losses took place on designated employment land (category B). This is contrary to the expectations of the local plan.

Losses to B8 (storage and distribution) took place on sites allocated for housing and were mostly in-line with policy.

Other Development

There was a net loss in general shops (A1). There were no gains of general shops (A1) in Luton town centre, only losses. The majority of new provision was located in neighbourhood and district centres.

There was a net gain in professional and financial services (A2), much of which was delivered within Luton town centre.

Restaurants and café (A3) provision continues to increase. The biggest gains were seen in out-of-centre locations.

Drinking establishments (A4) continue to decline, with the closure of two pubs and no new provision.

Hot food takeaways (A5) continue to increase, with the majority of new development in edge-of-centre locations.

There was a net gain of hotel uses (C1), all of which was located in out-of-centre areas.

There was a net loss in non-residential institutions (D1), driven by the demolition of old buildings at Stopsley High School.

Assembly and leisure uses (D2) decreased, with most change taking place at out-of-centre locations.