

Luton Borough Council

5 Year Housing Land Supply Statement 2025

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1. Introduction

- 1.1. This Housing Land Supply Statement has been prepared in March 2026. The housing completion and permission data it relies upon is that verified at 31 March 2025.
- 1.2. The review of the projections for future delivery was undertaken between January and March 2026 informed by consultations with the development industry, development management colleagues and historic information.
- 1.3. This statement assesses the housing land supply position for Luton for the five year period 1 April 2025 to 31 March 2030.
- 1.4. The five year housing land supply is published annually as a standalone report.
- 1.5. The next 'annual' update will be published following the completion of the annual completion and permission monitoring following the end of the monitoring year 2025 to 2026.

2. National Policy Context

- 2.1 The revised National Planning Policy Framework was published on 12 December 2024 and included substantial changes to the requirement for local planning authorities to identify and update annually a supply of specific deliverable sites.
- 2.2 Paragraph 78 of the revised NPPF makes it clear that all local planning authorities are required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years; worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.
- 2.3 For Luton this means that because it is more than five years since the Local Plan was adopted the housing land supply should be demonstrated against the local housing need for Luton. Further details of how the local housing need is calculated are set out below in Paragraphs 3.2 and 3.3.
- 2.4 Paragraph 78 of the revised NPPF requires a buffer (moved forward from later in the plan period) to be added to the local housing need of either:
 - 5% to ensure choice and competition in the market for land; or
 - 20% where there has been significant under-delivery in the previous three years to improve the prospect of achieving the planned supply. This is measured against the Housing Delivery Test (HDT). The 2023 test results

covering the three years prior to 2023 were published alongside the revised NPPF on 12 December 2024.

- 2.5 Paragraph 78 of the revised NPPF requires that where there has been significant under delivery of housing over the previous three years, the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period). Footnote 40 to Paragraph 78 explains that significant under delivery over the previous three years will be measured against the HDT, where this indicates that delivery was below 85% of the housing requirement. In the latest published HDT results – 2023 measurement, Luton met the HDT for the years 2020/21 to 2022/2023 with a HDT 2023 measurement of 499%. This means that the Council is not required to include a buffer of 20% in the five year housing land supply. However, the Council is still required to include a buffer of 5% in accordance with Clause a) of Paragraph 78 of the revised NPPF.
- 2.6 In summary, this means that Luton Council is required to identify and update annually a supply of specific deliverable sites to demonstrate a five year housing land supply against the local housing need for Luton. The inclusion of a 5% buffer in the housing land supply is required.
- 2.7 Annex 2: Glossary of the revised NPPF continues to include definitions for ‘Deliverable’ and ‘Developable’ sites which are relevant to the calculation of the housing land supply.
- 2.8 Deliverable sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. There are two categories of deliverable sites:
- Category a) - sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans); and
 - Category b) – where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 2.9 Developable sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

- 2.10 The national Planning Practice Guidance (PPG) - Housing Supply and Delivery sets out guidance on the five year housing land supply and the Housing Delivery Test. It was first published on 22 July 2019 and revisions made on 12 December 2024 to reflect updates to the revised NPPF published on the same date.

3. Luton's Five Year Housing Land Supply Requirement

- 3.1 The Luton Local Plan 2011-2031 was adopted in 2017 and hence is over five years old. This means that in accordance with the current NPPF (December 2024) the housing land supply for Luton should be demonstrated against the local housing need.

Local Housing Need

- 3.2 The local housing need is calculated using the Standard method set out in the national Planning Practice Guidance – Housing and economic needs assessment¹.
- 3.3 Using the most recent figures the annual local housing need for Luton is 1,095 dwellings per year, which is 5,477 dwellings for the five year period 2025 to 2030².

Past Performance

- 3.4 In accordance with Paragraph 78 of the NPPF only a 5% buffer will be added to Luton's annual local housing need as there has not been significant under-delivery in the previous three years, which would have required the addition of a 20% buffer.
- 3.5 Significant under-delivery over the previous three years is measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement. In the latest published HDT results – 2023 measurement, Luton met the HDT for the years 2020/21, 2021/22 and 2022/23 with a HDT 2023 measurement of 499%, incurring no sanctions.

The Annual Housing Requirement

- 3.6 Taking into account the local housing need and the 5% buffer, the annual housing requirement for Luton of 1,150.2 dwellings will be applied to assessing the five year supply of deliverable housing sites in Luton for the period 2025/26 to 2029/30.

¹ In accordance with Paragraph 78, Footnote 39 of the National Planning Policy Framework (December 2024). <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessment>

² The Annual Local Housing Need for Luton is 1095.41. The Five year Local Housing Need is calculated by multiplying the Annual Local Housing Need by 5. For Luton this calculation is 1095.41 x 5 which equals 5477.0518. This has been rounded to the nearest whole number of 5477.

4. Luton's Five Year Housing Land Supply

4.1 The Council identified all housing sites from the annual monitoring records and identified those that it considered could meet the NPPF 'deliverable' definition and can be considered as part of the five year housing land supply work. The sites were categorised by size and planning status. Details of the numbers of sites by category and the delivery assumptions are set out below.

Sites of 9 dwellings or less

4.2 There are 118 sites of 9 dwellings or less identified in the Schedule of Sites in Appendix 1 to this report. Of which:

- NPPF Category A - 115 sites with detailed planning consent (43 sites under construction totaling 108 remaining dwellings and 72 sites construction not started totaling 210 dwellings) and 3 sites with outline planning permission for a total of 6 dwellings.

4.3 All these sites are considered deliverable within five years. These 118 sites have a total dwelling capacity of 324 dwellings.

4.4 It is not feasible for the Council to explore the delivery of these sites individually. Therefore, the Council has used the following assumptions for the build out rate of these sites:

- Sites of 9 dwellings or less under construction at the end of the monitoring year (31 March) will be completed within the next two years, with 75% of dwellings in the first year and 25% of dwellings in the second year; rounded to whole dwelling units; and
- Sites of 9 dwellings or less not started at the end of the monitoring year (31 March) will be completed within the next five years, with 10% of dwellings in the first year, 25% of dwellings in the second year, with 35% of dwellings in the third year, 20% of dwellings in the fourth year, and 10% of dwellings in the fifth year; rounded to whole dwelling units.

Table 1: Luton Build Rate Assumptions – Sites under construction at 31/03/25

Number of Units (Dwellings)	Year 1	Year 2	Year 3	Year 4	Year 5
1	1	0	0	0	0
2	2	0	0	0	0
3	2	1	0	0	0
4	3	1	0	0	0
5	4	1	0	0	0
6	4	2	0	0	0
7	5	2	0	0	0
8	6	2	0	0	0
9	7	2	0	0	0

Table 2: Luton Build Rate Assumptions – Sites not started at 31/03/25

Number of Units (Dwellings)	Year 1	Year 2	Year 3	Year 4	Year 5
1	0	0	1	0	0
2	0	1	1	0	0
3	0	1	1	1	0
4	0	1	1	1	1
5	1	1	2	1	0
6	1	2	2	1	0
7	1	2	3	1	0
8	1	2	3	2	0
9	1	3	3	2	0

- 4.5 For sites of 9 dwellings or less with outline planning permission the Council has taken the same approach as for sites of 9 dwellings or less not started at the end of the monitoring year by applying the same build out rate. However, due to the need to obtain reserved matters permission, the build out rate is assumed to start a year later than those sites with detailed permission at the end of the monitoring year.
- 4.6 For sites of 9 dwellings or less permitted after the end of the monitoring year, the Council has taken the same approach as for sites of 9 dwellings or less not started at the end of the monitoring year by applying the same build out rate. However, due to the more recent permission dates of these sites, the build out rate is assumed to start a year later than those sites with permission at the end of the monitoring year.

Large Sites - Sites of 10 to 399 dwellings

- 4.7 There are 60 sites of between 10 and 399 dwellings identified in the Schedule of Sites in Appendix 1 to this report. Of which:
- NPPF Category A - 48 sites with detailed planning consent (21 sites under construction totaling 1,735 remaining dwellings and 27 sites construction not started totaling 1,659 dwellings);
 - NPPF Category B - 1 site with outline planning permission; and
 - NPPF Category B - 11 sites allocated in the Adopted Luton Local Plan 2011-2031 without planning permission.
- 4.8 All the Category A sites are considered deliverable within five years. These 48 sites have a total remaining dwelling capacity of 3,394 dwellings.
- 4.9 The Category B site with outline planning permission is also considered deliverable within five years. This site has a total dwelling capacity of 207 dwellings.

4.10 The eleven Category B sites allocated in the Adopted Luton Local Plan without planning permission are considered developable and not included in the five year housing land supply. These sites have a total dwelling capacity of 699 dwellings. This includes one Local Plan allocated site which has been granted planning permission since 1 April 2025 – 13 - 31 Dunstable Road and Trent House³.

4.11 The Council explored the delivery of all of the sites of between 10 and 399 dwellings individually and requested an estimate of the build start date and build-out rate from the site promoters/ developers. Where no response was received, the Council applied the following assumptions:

- Sites of 10 to 49 dwellings under construction at the end of the monitoring year (31 March) assumed will be completed within the next year. If a response had been received from the site promoters/ developers that informed the previous year's Five Year Housing Land Supply then those build-out assumptions were used; and
- Sites of 10 to 49 dwellings not started at the end of the monitoring year (31 March) assumed will be completed within the next year.
- For sites of 10 to 49 dwellings permitted after the end of the monitoring year, or where a condition/ conditions have been discharged after the end of the monitoring year, the Council has taken the same approach as for sites of 10 to 49 dwellings not started at the end of the monitoring year by applying the same build out rate. However, due to the more recent permission dates of these sites, the build out rate has been assumed to start a year later than those sites with permission at the end of the monitoring year.
- For sites of 50 to 99 dwellings the Council has assumed an average build out rate of about 30 dwellings per year or 30 flats/ apartments per year reflecting local knowledge and evidence from Lichfields 'Start to Finish' research report⁴. Flats/ apartments assumed to be completed in blocks in accordance with the layout of individual sites. Where sites of 50 to 99 dwellings were not started at the end of the monitoring year (31 March) it has been assumed that first completions will be in Year 3.
- For sites of 100 to 399 dwellings the Council has assumed an average build out rate of about 50 dwellings per year or 50 flats/ apartments per year reflecting local knowledge and evidence from Lichfields 'Start to

³ Site allocated for 124 dwellings. 24/00847/FUL permitted 11/12/25 for 291 dwellings.

⁴ Figure 4.1: Average build-out rate by size of site (dwellings), Page 13, Lichfields – 'Start to Finish - How quickly do large-scale housing sites deliver?' Third Edition, March 2024.

Finish' research report⁵. Flats/ apartments assumed to be completed in blocks in accordance with the layout of individual sites.

Sites of more than 400 dwellings with planning permission

- 4.12 There are 4 sites of more than 400 dwellings identified in the Schedule of Sites in Appendix 1 to this report. Of which:
- NPPF Category A - 3 sites with detailed planning consent (2 sites under construction totaling 998 remaining dwellings and 1 site construction totaling 414 dwellings not started); and
 - NPPF Category B - 1 site with outline planning permission.
- 4.13 All the Category A sites are considered deliverable within five years. These four sites have a total remaining dwelling capacity of 1,412 dwellings.
- 4.14 The Category B site with outline planning permission has a total dwelling capacity of 1,195 dwellings and is considered developable.
- 4.15 The Council explored the delivery of all the sites of more than 400 dwellings individually and requested an estimate of the build start date and build-out rate from the site promoters/ developers. A response was received for the following Category A site:
- Land opposite Whitbread House, Flowers Way – Site capacity increased from 402 to 414 dwellings. All 414 dwellings expected to be completed by 2027/28 due to firm progress on site and discharge of conditions.
- 4.16 For the other three sites, where no response was received, the Council applied the following assumptions:
- 4-11 Burr Street (Category A site) – This site has 406 apartments in four separate blocks which can be built concurrently. Application awaiting determination at 1st April 2025 to increase site capacity by 8 units to 414 units. Site progressing with discharge of conditions and site cleared. Blocks A and B totaling 121 apartments to be completed in Year 3, i.e. by 31st March 2028. Blocks C and D totaling 285 apartments to be completed in Year 5, i.e. by 31st March 2030;
 - Napier Park (Category A site) - Lu2on – 401 dwellings completed prior to 1st April 2024. The remaining 592 dwellings are expected to be completed by 31st March 2030; and
 - Power Court (Category B site) – this site includes a new football stadium which will be built in Phase 1 with residential development in Phase 2. The

⁵ Figure 4.1: Average build-out rate by size of site (dwellings), Page 13, Lichfields – 'Start to Finish - How quickly do large-scale housing sites deliver?' Third Edition, March 2024.

residential development is estimated to start in 2028/29 with the first completions beyond this current five year period, i.e. after 1 April 2030.

Summary of Total Housing Land Supply and Deliverable and Developable Sites at 1st April 2025

- 4.17 As of 1st April 2025 land was available for a total of 7,231 dwellings within Luton. Table 3 below outlines the breakdown of this supply.

Table 3: Total Housing Land Supply for Luton (1st April 2025)

Planning Status	Total Dwellings
Planning Permission – Outline	1,408
Planning Permission – Full/ Reserved Matters	5,124
Allocated in the Adopted Luton Local Plan 2011-2031 – Without Planning Permission	699
Total	7,231

- 4.18 As identified in the Schedule of Sites in Appendix 1 to this report not all of these dwellings are expected to be delivered within the five year period 2025/26 to 2029/30. As explained above, for the purposes of the five year housing land supply assessment, each site has been assessed to determine the realistic prospect of development taking place within the five year period, in line with the definition of ‘deliverable’ set out in the Glossary of the current NPPF (December 2024) and taking into account the national Planning Practice Guidance. Each site has been categorised into ‘deliverable’ within five years or ‘developable’ beyond the five years. Table 4 below sets out the number of sites and dwellings by site category.

Table 4: Number of Sites and Dwellings by NPPF Site Category

NPPF Category A or B	Category A & B Sub Category	Deliverable or Developable	Number of Sites	Number of Dwellings
A	Detailed Consent	Deliverable	166	5,124
A	Outline Consent ⁶	Deliverable	3	6
B	Outline Consent	Deliverable	1	207
B	Outline Consent	Developable	1	1,195
B	Allocated in the Adopted Luton Local Plan 2011-2031 – without planning permission	Developable	11	699
Total			182	7,231

Luton’s Five Year Housing Land Supply Position

- 4.19 Using the standard method housing local need figure as the requirement and the projected supply for the five year period 2025 to 2030, the five year housing land supply calculation for Luton Borough is set out below.

⁶ Sites of 9 or less dwellings.

4.20 The five year housing land supply position in the Borough is 4.64 years (see Table 5).

Table 5: Luton Five Year Housing Land Supply Position 2025/26 – 2029/30

	Net number of dwellings⁷
Annual Local Housing Need (2025-30) (Standard Method)	1,095.41
Five year Local Housing Need 2025/26 – 2029/30 (Rounded)	5,477
5% Buffer (Rounded)	274
Five Year Land Supply Requirement (Rounded)	5,751
Total Supply of Deliverable Sites	5,337
Total Supply compared to requirement (Shortfall)	- 414
Total number of years supply	4.64 years

⁷ As explained in Footnote 2 of this report the Annual Local Housing Need and the Five year Local Housing Need have been rounded to the nearest whole number. The 5% buffer is 273.85259 unrounded, and has been rounded to 274. The consequent Five Year Housing Land Supply Requirement is 5,750.90 unrounded, which has been rounded to 5751.