

Strategic Housing Land Availability Assessment

November 2019

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1. Introduction

What is a Strategic Housing Land Availability Assessment?

The National Planning Policy Framework (NPPF), published February 2019, requires Luton Council to:

'...have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment...' (paragraph 67)

and

'...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...' (paragraph 73)

For plan-making purposes, this strategic housing land availability assessment (SHLAA) meets the requirements of paragraph 67 of the NPPF to identify a supply of:

- 'a) specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.'

National planning practice guidance (NPPG) on land availability assessments can be accessed on-line¹. This report applies the guidance as it was on 23 October 2019. The guidance advises that the primary role of the SHLAA is to:

- identify sites and broad locations with potential for development;
- assess their development potential;
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability).¹²

It is not the role or purpose of the SHLAA to make judgements as to what strategy should be adopted and it does not allocate land for housing. Any sites without planning permission that have been identified in the SHLAA will need to be subject to the planning process for housing development to be allowed.

Context and Study Area

The NPPG states that the geographical area to be covered should be the plan-making area³. This assessment covers the administrative area of Luton Council.

Further Information

If you would like to discuss this report, please telephone 01582 547090 or send an email to LocalPlan@luton.gov.uk

¹ [National planning guidance on housing and economic land availability assessment](#)

² Housing and economic land availability assessment, Paragraph 001, Reference ID 3-001-20190722

³ Housing and economic land availability assessment, Paragraph 006, Reference ID 3-006-20190722

2. Recent Housing Development Profile

By examining the profile of housing development it is possible to identify some key characteristics and challenges relating to housing delivery in Luton.

Completions by Location

Table 2.1 Net Dwelling Completions by Location, 01 April 2011 to 31 March 2019

Year	Central Area and 300m Buffer	Strategic Sites	Rest of Luton	Total
2011/2012	179	-12	323	490
2012/2013	130	7	214	351
2013/2014	31	-2	118	147
2014/2015	286	15	114	415
2015/2016	204	79	341	624
2016/2017	567	57	174	798
2017/2018	549	121	203	873
2018/2019	188	195	244	627
Total	2,134	460	1,731	4,325

In total, 49% of new dwellings have been delivered in the central area, 11% in strategic sites and 40% throughout the rest of Luton.

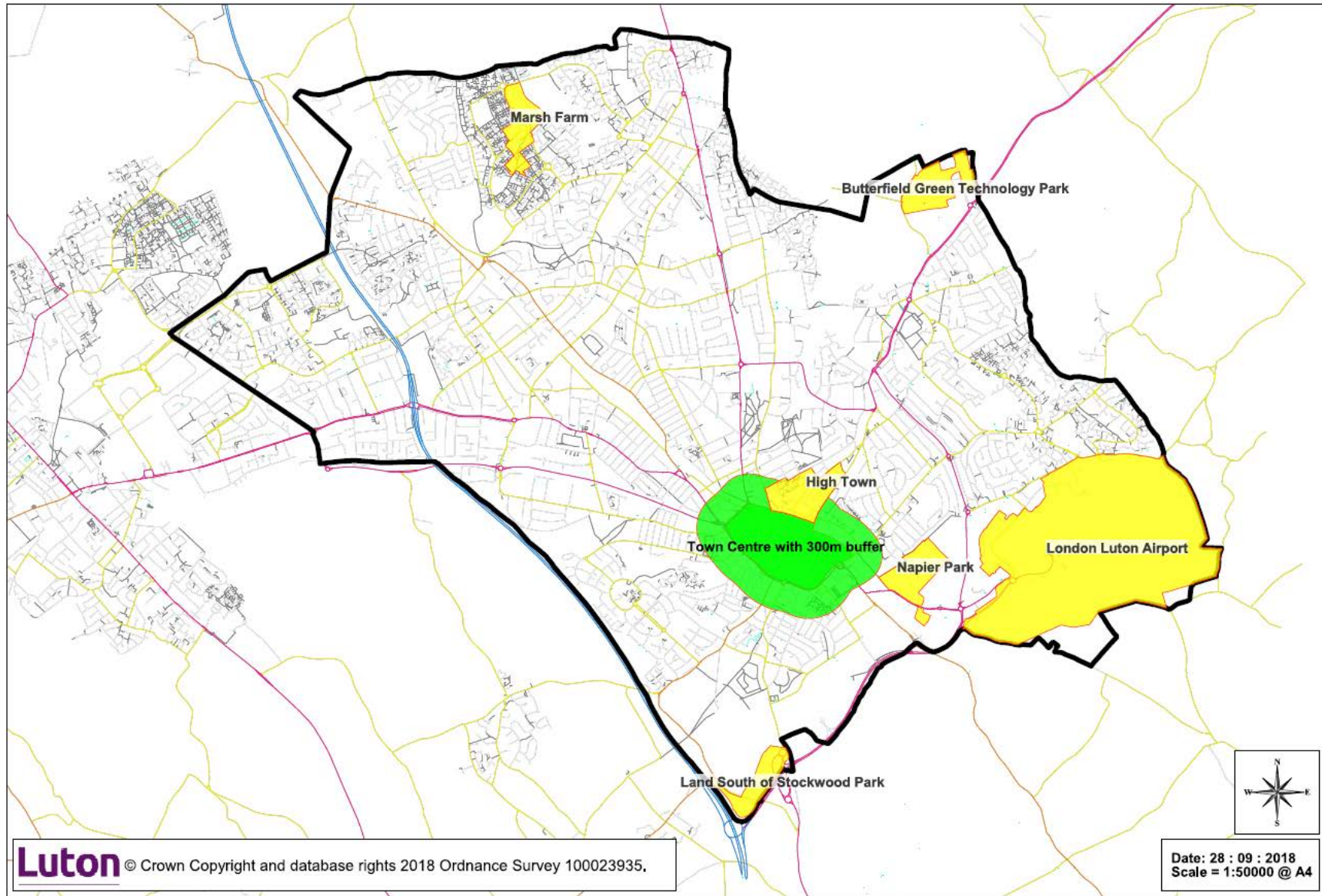
Between 2016 and 2018, a much higher proportion of development took place in the central area, predominantly resulting from the conversion of offices to residential accommodation under permitted development rights and the provision of student accommodation.

In 2018/19, a higher proportion of development took place in strategic sites. This reflects the start of development at Napier Park and the continuing regeneration of Marsh Farm and High Town.

Also of significance is that 2018/19 saw a decline in total delivery, following four years of consecutive increases. This reflects a reduction in numbers of office-to-residential conversions and new student accommodation.

The following page describes the location of strategic sites and the extent of the town centre with 300m buffer. Note that the central area and 300m buffer includes strategic sites within the town centre but excludes the High Town strategic site.

Strategic allocations and town centre with buffer



Development Sites by Size

Table 2.2 Number of Completed Permissions by Gross Number of Homes, 01 April 2011 – 31 March 2019

Total #Dwellings in Scheme	Central Area and 300m Buffer	Strategic Sites	Rest of Luton	Total
1-10 dwellings	113	27	220	360
11-24 dwellings	29	5	22	56
25-49 dwellings	10	3	8	21
50-99 dwellings	6	5	7	18
100+ dwellings	4	0	3	7
Total	162	40	260	462

In total, 78% of development schemes involved the construction of 10 dwellings or fewer. This pattern of development is likely to continue due to the built-up nature of Luton.

Previously Developed Land

Table 2.3 Percentage of New Dwellings on Previously Developed Land, 01 April 2011 – 31 March 2019

Year	Central Area and 300m Buffer (%)	Strategic Sites (%)	Rest of Luton (%)	Total (%)
2011/2012	100	N/A	69.3	79.8
2012/2013	100	100	28.9	56.7
2013/2014	100	N/A	67.8	74.1
2014/2015	100	100	50.0	86.3
2015/2016	100	100	19.0	55.8
2016/2017	100	100	90.8	98.0
2017/2018	99.6	99.2	91.6	97.7
2018/2019	100	100	62	85

The majority of development on greenfield sites between 2011 and 2016 was the result of the 'New Homes for Luton' scheme, which used open spaces to provide affordable housing. 2015/16 saw the completion of the final site. Following this, the percentage of development on previously developed land has now returned to levels seen under the previous local plan.

During 2018/19 there was an increase in development on greenfield sites. This was largely driven by historic permissions from the 1950's being built-out at Felstead Way and Clinton Avenue and also development on a wildlife site at Turnpike Drive.

Other than in exceptional circumstances, the built-up nature of Luton and limited supply of open spaces results in a high proportion of development occurring on previously developed land.

Density

Table 2.4 Gross Dwelling Density (Dwellings per Hectare), 01 April 2011 - 31 March 2019

Year	% completions less than 30dph	% completions between 30dph and 50dph	% completions over 50dph
2011/2012	0.5	26.8	72.7
2012/2013	0.5	15.9	83.5
2013/2014	6.5	41.6	51.9
2014/2015	1.0	11.7	87.4
2015/2016	1.1	32.5	66.3
2016/2017	0.7	7.7	91.6
2017/2018	3.9	5.7	90.5
2018/2019	7.1	8.1	84.9

The data between 2011 and 2016 show a significant percentage of development taking place between 30 and 50 dwellings per hectare (dph). This is largely an effect of the completion of large greenfield sites (particularly the New Homes for Luton programme and development at Birchen Grove allotments). Now that those schemes have completed, the vast majority of development occurs above 50dph.

The recent increase in lower density developments in 2018/19 relates to the development of greenfield sites (previously discussed). The development of the western side of Napier Park is slightly under 50dph, which will influence future statistics as this site is built-out over the coming years.

Due to the built-up nature of Luton and limited supply of open spaces, it is likely that the majority of development will continue to be delivered above 50dph.

Bedroom Size

Table 2.5 Net Dwellings by Number of Bedrooms, 01 April 2011 – 31 March 2019

Year	1 bed	2 bed	3 bed	4+ bed	Unknown	Total
2011/2012	212	138	58	119	-37	490
2012/2013	133	136	35	50	-3	351
2013/2014	77	32	24	10	4	147
2014/2015	202	123	43	17	30	415
2015/2016	278	234	62	51	-1	624
2016/2017	566	169	50	53	-40	798
2017/2018	571	251	22	33	-4	873
2018/2019	268	202	89	69	-1	627
Total	2,307	1,285	383	402	-52	4,325

Development activity continues to be concentrated on the provision of smaller properties, reflecting the delivery of flatted accommodation. Activity to convert offices to residential accommodation under permitted development rights and the provision of apartments and smaller properties when delivering larger schemes on previously developed land has meant this trend has been maintained in-line with the increase in overall completions.

Most of the 4+bed units delivered are clusters of student rooms or houses in multiple occupation. In 2018/19, the majority of 4+bed homes came from the lower density, greenfield development noted earlier in this report.

3. Method

Updating the Previous Assessment

This SHLAA is the latest in a series of housing land availability reports, each of which has built-on and updated information from the preceding report. Sites from the previous SHLAA (December 2018) were re-assessed, based on the latest knowledge from:

- Senior planning officers and project managers at Luton Council
- Contact with applicants, land owners and agents
- Visits to sites with current planning permission
- Review of recent planning applications

New sites were also assessed following identification through:

- Senior planning officers and project managers at Luton Council
- Contact with applicants, land owners and agents
- Review of planning applications approved between April 2018 and March 2019
- Review of council committee agendas regarding public land disposals

This review does not include information on the development status of sites after March 2019. This allows the SHLAA to inform (and be consistent with) housing monitoring and trajectory reports covering the 2018/19 financial year. Development status post-March 2019 will be reported through the next SHLAA update.

Minimum Site Size and Housing Yield

Identifying and appraising every potential, residential development site would require an excessive amount of resources. For an appropriate level of robustness, the SHLAA focuses on sites that are able to deliver at least 5 dwellings. This is in line with national planning practice guidance, which states:

'...It may be appropriate to consider all sites and broad locations capable of delivering five or more dwellings.'⁴

Where there is no other information available, a site size threshold of 0.1 hectares is applied, equating to 5 homes at a density of 50 dwellings per hectare. As shown in table 2.4, it is reasonable to assume that such densities will be achieved.

This basic density assumption is superseded by more considered, technical evidence where available. Such sources of information include the:

- Review of town centre office/ business premises for alternative re-use (Peter Brett, May 2013)
- Employment land review (NLP, March 2013)
- High Town Masterplan (LBC, September 2016)

Higher density assumptions (75 dwellings per hectare) are employed in locations within 300 metres of town centres. This reflects policy LLP15 of the Luton Local Plan 2011-2031, which encourages higher densities near these areas.

⁴ Housing and economic land availability assessment, Paragraph 009, Reference ID 3-009-20190722

Information from planning applications and other statements of development intent (e.g. through 'call for sites' exercises) generally supersedes assumptions on housing yield where this is considered reasonable.

For student and older people's housing, national planning practice guidance states that:

' All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply based on:

- the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or
- the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.

This will need to be applied to both communal establishments and to multi bedroom self-contained student flats. Several units of purpose-built student accommodation may be needed to replace a house which may have accommodated several students.

Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published census data, and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling.⁵

Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market...⁶

For Luton, the average number of students living in student only households is 2.5. The average number of adults living in households is 2.

It is noted that the above guidance only applies to the calculation of new dwellings for housing forecasts. Alternative methods apply to student and older person dwellings for the purposes of calculating housing completions.

Site Surveys and the use of Building Control Records

For each site with extant planning permission, annual surveys are undertaken to identify the progress of development. For this report, surveys were undertaken during summer 2019.

If a site has been substantially prepared (cleared, site notices up, activity ongoing), this is counted as a start. Sometimes sites are cleared and then stall. These are tracked over time and sites that have stalled for a few years may be excluded from the immediate 5-year land supply until such time as development re-commences or new information is obtained from relevant parties.

Completions are recorded in-line with government advice relating to housing flow reconciliation. Residential units are generally considered complete when a building becomes habitable. During site survey, the degree to which a

⁵ Paragraph: 034 Reference ID: 68-034-20190722

⁶ Paragraph: 035 Reference ID: 68-035-20190722

building is habitable is based on evidence of internal fittings such as kitchens and bathrooms. New houses should look like they can be moved into immediately.

Building control records are a useful source of information, particularly where there is uncertainty as to whether a development has started or completed. They can also indicate any issues during construction that may impact on delivery timings. Relevant information is reflected in the assessment but exact details are not recorded due to the confidential nature of building control data.

Assessment Criteria

Having identified the sites to be considered in the study, a spreadsheet is employed to ensure a consistent assessment across all sites. This accords with guidance and includes specific criteria to assess suitability, availability and achievability.

Suitability

The main factors underlying the assessment of suitability for housing include:

- Policy restrictions (is residential development constrained by local or national policy?);
- Physical restrictions (is there a feature of the land, such as access or pollution, that constrains residential development?);
- Potential adverse impacts (could residential development result in adverse effects, including effects on landscape and conservation?); and
- Environmental/ amenity conditions (could future/ existing residents be faced with an oppressive environment?)

Sites that have received planning permission or are allocated for housing through the local plan are generally considered to be suitable.

Much of the land within Luton is suitable for residential development. The majority of sites assessed as being unsuitable are those within areas of discordant land uses (e.g. within existing employment estates), at locations of poor air quality (e.g. next to the motorway) or on areas of open space (including Green Belt land). Development of residential uses in these locations would generally be in conflict with local planning policies.

Unsuitable sites might become suitable in the future but only when realistic proposals have been identified/ agreed to address the policy concerns. For example, there might be an agreement to provide open space elsewhere in the town that would meet the policy requirements for the residential re-development of existing open space.

Availability

National planning practice guidance advises that:

‘A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available...⁷¹

Sites that have extant planning permission are generally considered to be available unless there is evidence to suggest otherwise.

⁷¹ Housing and economic land availability assessment, Paragraph 019, Reference ID 3-019-20190722

Where sites are not currently available, the assessment considers whether they are likely to become available in the foreseeable future.

Achievability

National planning practice guidance advises that:

'A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.'⁸

Preparing a detailed valuation of every site is not reasonable given the number of sites within the SHLAA. Where site-specific information is not available, a view is taken that is based on the local knowledge of planning officers.

Sites that have extant planning permission are generally considered to be achievable unless there is evidence to suggest otherwise.

Where the development of a site is not currently viable, the assessment considers whether it is likely to become achievable in the foreseeable future.

Chapter 6 of the SHLAA provides an overview on the current status of the housing market and risks to delivery.

Assessment Conclusion

Taking all the information into account, each site is allocated an overall classification: deliverable, developable, suitable or unsuitable. These classifications are based on the following logic:

- **Deliverable.** The site is suitable, available and achievable. There is a reasonable prospect that housing will start to be delivered within 5 years.
- **Developable.** The site is suitable but availability or achievability hinder development. There is a reasonable prospect that housing will start to be delivered at the point envisaged, after the immediate 5-year period.
- **Suitable.** The site is suitable for residential uses but not available or achievable. There is no certainty when, or whether, housing will be delivered.
- **Unsuitable.** The site is unsuitable for residential development. Note that earlier editions of the SHLAA referred to this as 'not developable'.

The following matrix is employed to estimate when development might start.

Matrix to Estimate Delivery Timings

		Achievability	
		No concerns	Concerns can be resolved
Availability	No concerns	Years 1 to 5	Years 6 to 10
	Concerns can be resolved	Years 6 to 10	Years 11+

⁸ Housing and economic land availability assessment, Paragraph 021, Reference ID 3-020-20190722

Deliverable sites

For assessment purposes, a site is considered deliverable if there is a reasonable prospect that residential units will be provided in the current or next 5 financial years. For this SHLAA, the current year is 2019/20.

Annex 2 of the NPPF provides the following explicit definition of deliverable sites:

" To be considered deliverable, sites for housing 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. In particular:

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).

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."

4. Housing Land Availability in Luton

The appendices of this report detail the assessment of each site and provide overview maps as to their location.

Table 4.1 provides an overview of the assessment results for each classification of site. These classifications reflect the types of sites suggested by national planning practice guidance⁹. The table shows how many sites were appraised and the number of dwellings that they could deliver.

The total estimated capacity of the 250 sites identified in Luton is 16,657 dwellings. These numbers refer to all of the sites assessed, including those considered unsuitable for housing. The paragraphs below explain how many of these sites are considered to have a reasonable prospect of delivering new homes.

24% of sites (60) are considered to be deliverable within the next 5 years. These sites have an estimated yield of 3,659 dwellings. The majority (97%) of those either have planning permission for housing or are currently under construction. Deliverable sites include land at Marsh Farm and Napier Park, which are important for the regeneration of Luton. It should be noted that Napier Park is a large scheme that is also expected to deliver dwellings beyond the next 5 years.

A further 23% of sites (58) are considered to be developable and appropriate for inclusion within the longer-term land supply. These sites have an estimated yield of 2,966 dwellings. These include locations that are important to the redevelopment of High Town.

15% of sites (38) are categorised as being suitable only and have a total capacity of 588 dwellings. Some of these sites may become part of the land supply in the future, once issues of availability and achievability are resolved. These sites could be considered as a source of future windfall.

The 94 remaining sites are unsuitable for residential development and have a total capacity of 9,444 dwellings. They are likely to remain unsuitable until an applicant can bring forward a scheme that addresses the specific constraints of the site and/or policy requirements. Many of these sites comprise valuable employment land and open spaces.

It should be noted that sites with full planning permission with a yield of less than 5 dwellings have not been assessed through the SHLAA. Planning permission for 179 dwellings currently exists on these sites, which form part of the 5-year housing land supply.

⁹ Housing and economic land availability assessment, Paragraph 012, Reference ID 3-012-20140306

The following information should be used in relation to table 4.1:

- AllocPerm - land allocated/with permission for employment or other uses that might no longer be required;
- HousAlloc - housing allocations/site development briefs;
- HousComp - comprehensive redevelopment or redesign of existing residential areas;
- HousExpired - sites relating to expired planning permissions;
- HousExtant - unimplemented planning permissions for housing;
- HousIntens - intensification of existing housing areas through release of garage blocks etc;
- HousU/C - permissions for housing under construction;
- NewSett - new standalone settlements (not applicable in Luton);
- NonRes - non-residential land potentially suitable for redevelopment for housing, including mixed-use schemes;
- PubSector - surplus public sector land;
- SiteRural - sites in rural settlements or rural exception sites (not applicable in Luton);
- UrbExt - urban extension sites (not applicable in Luton); and
- VacDerelict - vacant or derelict land.

Table 4.1 Land Availability by Site Type

Source	Suitable Only		Unsuitable		Developable		Deliverable	
	#Sites	#Dwellings	#Sites	#Dwellings	#Sites	#Dwellings	#Sites	#Dwellings
AllocPerm	0	0	35	5,269	0	0	0	0
HousAlloc	13	224	3	57	30	1,567	1	39
HousComp	0	0	0	0	0	0	0	0
HousExpired	12	124	1	38	10	149	0	0
HousExtant	0	0	0	0	6	1,128	33	1,347
HousIntens	8	115	4	37	3	21	0	0
HouseU/C	0	0	0	0	3	18	25	2,248
NewSett	0	0	0	0	0	0	0	0
NonRes	1	75	26	2,943	2	21	1	25
PubSector	1	39	24	1,047	3	41	0	0
SiteRural	0	0	0	0	0	0	0	0
UrbExt	0	0	0	0	0	0	0	0
VacDerelict	1	11	1	53	1	21	0	0
TOTAL	38	588	94	9,444	58	2,966	60	3,659

Land Availability by Location

Table 4.2 Land Availability by Location

	Suitable Only		Unsuitable		Developable		Deliverable	
	#Sites	#Dwellings	#Sites	#Dwellings	#Sites	#Dwellings	#Sites	#Dwellings
Central Area and 300m Buffer	7	105	7	134	13	1,342	27	1,071
Strategic Sites	13	214	6	74	17	470	6	1,474
Rest of Luton	18	269	81	9,236	28	1,154	27	1,114
TOTAL	38	588	94	9,444	58	2,966	60	3,659

54 sites have been identified within the central area. Of these, 40 are deliverable or developable and can contribute 2,413 new homes in the future.

42 sites have been identified within strategic sites. Of these, 23 are deliverable or developable and can contribute 1,944 new homes in the future.

154 sites have been identified within the rest of Luton. Of these, 55 are deliverable or developable and can contribute 2,268 new homes in the future.

Site Starts by Year

Table 4.3 Number of Developments by Site Size and Start Period

Number of Dwellings	Number of Sites by Period		
	Years 0-5	Years 6-10	Years 11+
5-24 dwellings	38	31	3
25-49 dwellings	9	7	4
50-99 dwellings	5	6	2
100+ dwellings	8	5	0
Total	60	49	9

It should be noted that table 4.3 describes when the first units are expected to be delivered. In practice, delivery will be phased across later years for the larger sites.

5. Housing Targets and the Five-Year Supply

Paragraph 73 of the National Planning Policy Framework requires local planning authorities to:

‘...identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies... The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply’.

Housing Targets

The Luton Local Plan 2011-2031 was adopted on 07th November 2017 containing a target for 8,500 new homes in the 20 year period (425 per year).

4,325 dwellings were delivered between April 2011 and March 2019, averaging 540 units per year. This represents an oversupply of 925 dwellings across the first eight years of the plan (annualised rate of 425 x 8 years = 3,400). Accordingly, a 5% buffer should be applied to future housing land supply, rather than the 20% for authorities that have a record of under delivery. Table 2.1 shows that there has been no under delivery of housing over the previous three years.

4,175 more homes are required by 2031 to meet the targets from the local plan. This equates to an average of 348 units per year for the next 12 years.

Consideration of Windfall

Paragraph 70 of the National Planning Policy Framework states that:

‘Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends...’

National planning practice guidance further states that windfall can also be considered in years 6-15 where justifiable¹⁰.

For the purposes of this report, windfall is considered to comprise any housing from sites that were not part of the housing land supply when the local plan was developed. In this respect, the plan was developed on the basis of sites identified in the 2016 SHLAA. Calculations of windfall therefore start in the 2016/17 year.

Rates of windfall are as follows:

¹⁰ Housing and economic land availability assessment, Paragraph 23, Reference ID 3-023-20190722

Table 5.1 Historic Windfall

Year	Windfall	Non-windfall
2016/2017	34	764
2017/2018	124	749
2018/2019	194	433

Much of the windfall is due to recent permitted development rights (e.g. office to residential conversions) and it is unclear how this might continue into the future. Since 2016, 197 windfall units have come from office-to-residential conversions (8 units in 2016/17, 50 in 2017/18 and 139 in 2018/19). It should be noted that the council has applied restrictions to the application of permitted development, which will likely result in reduced windfall from this source.

Three years of data is not considered to be compelling evidence and windfall has therefore not been factored into forecasts of land supply.

Housing Trajectory

Table 5.1 lists each site in the identified land supply, the expected delivery timings and an indication of whether the land is considered previously developed (PDL). Although not assessed by this SHLAA, the second row of the table describes the expected development from sites delivering less than 5 dwellings. This has been calculated from the net delivery of all extant planning permissions, split evenly across the current and next five years.

Table 5.2 Identified Housing Sites

ID		19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	Total	PDL?
	Total Projections	800	763	468	423	406	263	713	691	634	717	642	58	62	64	78	35	6,817	
	Permissions for 4 dwellings or less	30	30	30	30	30	29											179	
567	55 George Street and 2B George Street West	5																5	Yes
574	14 Stuart Street	5																5	Yes
575	46 Windsor Walk	5																5	Yes
519	Birdsfoot Lane depot	6																6	Yes
471	Saints community centre	7																7	Yes
530	Land rear Of 81 Dumfries Street	7																7	Yes
345	Milan Day Centre, Solway Road North	8																8	Yes
532	2B Medina Road	8																8	Yes
535	The Compasses, 11 Farley Hill	9																9	Yes
602	Round Green Tavern Hitchin Road	9																9	Yes
573	1 Park Terrace, Manor Road	10																10	Yes
561	2 - 6 Cardigan Street	11																11	Yes
551	214 to 220 Hitchin Road	12																12	No
224	46 London Road	14																14	No
241	43 Ridgway Road	14																14	Yes
609	Cannon Kirk House 64 - 66 Stuart Street	14																14	Yes
478	The Roman Way, Tomlinson Avenue	20																20	Yes
188	142-144 Midland Road	40																40	Yes
352	40-58 Collingdon Street	88																88	Yes
149	Marsh Farm Central Area	94																94	Yes
174	Land at Caleb Close	104	104															208	Yes
565	Chubb House, 400 Dallow Road	130																130	Yes
191	Kimpton Road (Napier Park)	150	150	183				157	157	157	157	157						1268	Yes
589	8 Marsh Road		4															4	No
588	Hatton Place, 114-134 Midland Road		6															6	Yes
593	13 London Road		6															6	Yes
601	46 - 52 Park Street		6															6	Yes
321	Petrol Stn 116-124 Wingate Road		13															13	Yes
494	High Town plot 6D		16						23									39	Yes

ID		19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	Total	PDL?
562	80 - 88 Collingdon Street		18															18	Yes
390	Land around 113 Proctor Way		20															20	Yes
597	Frank Lord House, 72 Chapel Street		20															20	Yes
592	Broadcasting House, 1 Hastings Street		37															37	Yes
585	48 Crawley Green Road		40															40	Yes
160	Moreton Park Estate		41															41	Yes
542	28 Dunstable Road		42															42	Yes
359	Bramingham Centre, Weltmore Road		51															51	Yes
587	Chicagos, 22 - 42 Gordon Street		59															59	Yes
564	1 - 11 Cumberland Street		100	109														209	Yes
254	Gloucester House Manor Road			5														5	Yes
595	25 Wellington Street			5														5	Yes
598	49 Cardiff Road			5														5	Yes
603	34 Clarendon Road			6														6	Yes
604	62 Carlton Crescent			7														7	No
182	69 Felstead Way			10			36											46	No
303	Car park adjacent to 69 Adelaide Street			13														13	Yes
605	106 to 108 Wellington Street			13														13	Yes
199	27-37 Chapel Street			18														18	Yes
300	Chaucer House, 134 Biscot Road			18														18	Yes
351	27A Upper George Street			46							26							72	Yes
606	The English Rose 46 Old Bedford Road				5													5	Yes
608	30 Guildford Street				5													5	Yes
607	46 to 48 Rothesay Road				8													8	Yes
563	Gilmartins House, 102 Collingdon Street				13													13	Yes
446	Maxet House and 26-34 Liverpool Road				66													66	Yes
460	Britannia Estate				87				65	77	65							294	Yes
208	13-31 Dunstable Road				90	93												183	Yes
183	The Windsor Castle, 12 Albert Road				119													119	Yes
611	Garage court rear of 59 Mangrove Road					5												5	Yes
222	Crescent House 1-5 Latimer Road					119												119	Yes
210	Land opposite Whitbread House, Flowers Way					159	159											318	Yes
420	Victoria House, Victoria Street						14											14	Yes
477	The Parrott, Whipperley Ring						25											25	Yes
489	High Town plot 1B							14										14	Yes
402	Land at the Orchard Centre, Strangers Way							27										27	No
218	39-51 John Street							39										39	Yes
161	Oxen Industrial Estate, Oxen Road							48										48	Yes
584	19-21 Burr Street							64										64	Yes
545	39 - 49 Manor Road							94										94	Yes
150	Power Court							100	100	150	100	100						550	Yes
337	Land Adjacent To Caddington Road & Newlands Road							170	170									340	No
472	The Old School House, Trinity Road								7									7	Yes

ID		19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	Total	PDL?
533	15 - 17 Cardiff Road								8									8	Yes
214	35 Guildford Street								14									14	Yes
364	10 to 12 Caleb Close								24									24	Yes
180	Dalroad Industrial Estate								32									32	Yes
543	39 Castle Street								35									35	Yes
339	Land at Stockingstone Road								56									56	Yes/No
431	25 - 31 Chester Avenue									4								4	No
578	Oatfield Close garage courts									5								5	Yes
138	High Town Block C, Midland Road Passage									6								6	Yes
422	Land and buildings at and behind 98-100 Wenlock Street									6								6	Yes
528	Land adjacent to 102 Hitchin Road									6								6	No
213	33 Guildford Street									11								11	Yes
348	27 Crawley Road									11								11	Yes
577	Berry Leys garage courts									11								11	Yes
583	Easingwold Gardens garage courts									11								11	Yes
304	89 - 93 Park Street									13								13	Yes
361	2 to 32 Beechwood Road									15								15	Yes
491	High Town plot 2B									16								16	Yes
559	Cresta House, Alma Street									55								55	Yes
148	Station Quarter									80	150	145						375	Yes
504	High Town plot 9										9							9	Yes
198	Rear of 66-76 Castle Street										11							11	Yes
509	Alsace Cottage, Stockwood Park										11							11	No
599	4 Eaton Green Road										12							12	Yes
320	111 North Street										14							14	Yes
412	38a Wingate Road										15							15	Yes
415	22 to 36 Hastings Street										18							18	Yes
370	Leagrave Service Station, High Street										21							21	Yes
485	High Town plot 5B										21							21	Yes
482	High Town plot 7										27							27	Yes
496	High Town plot 6A										60							60	Yes
245	7 Windmill Road											8						8	No
552	179 - 185 Dunstable Road											12						12	Yes
456	Connaught House, 15-17 Upper George Street											15						15	Yes
497	High Town plot 6B											18						18	Yes
353	Car park adjacent to 95 Maple Road East											49						49	Yes
490	High Town plot 2A											63						63	Yes
486	High Town plot 1A											75						75	Yes
488	High Town plot 1D												27					27	Yes
492	High Town plot 3												31					31	Yes
483	High Town plot 5A													3				3	Yes
202	37-47 Cheapside													59				59	Yes
169	Land between Russell Rise and Corncastle Road														23			23	No

ID		19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	Total	PDL?
175	Car Parks on Dunstable Place														41			41	Yes
487	High Town plot 1C															19		19	Yes
220	Luton Town Football Club, Kenilworth Road															59		59	Yes
190	Extension to Mall																35	35	Yes

Five-Year Housing Supply

The following table considers the immediate and subsequent 5-year land supply positions. It shows that, for both, there is a supply of sites sufficient to meet at least 5 years worth of housing requirements.

Table 5.3 Five-Year Housing Supply

Financial year	Forecast delivery	5-years rolling forecast delivery	Annual requirement	5-years rolling requirement	5-year requirement plus 5% buffer	Amount of land supply (years)
2019/20	800		348			
2020/21	763		348			
2021/22	468		348			
2022/23	423		348			
2023/24	406	2,860	348	1,740	1,827	7.83
2024/25	263	2,323	348	1,740	1,827	6.36

In table 5.3:

- The 5-year rolling forecast is the sum of each year's forecast delivery in that period. For example, the 5-year rolling forecast for 2023/24 is the sum of the forecasts from 2019/20 to 2023/24.
- The annual requirement is equal to the total housing target (8,500) minus completions since April 2011 (4,325), divided by the remaining time period of that target (12 years).
- The buffer is calculated as 5% of the 5-year rolling requirement.
- The amount of land supply (final column) refers to the five-year period ending in that year. For example, there is enough land supply between 2019/20 and 2023/24 to meet 7.83 years-worth of the housing target.

6. Market Appraisal and Risks

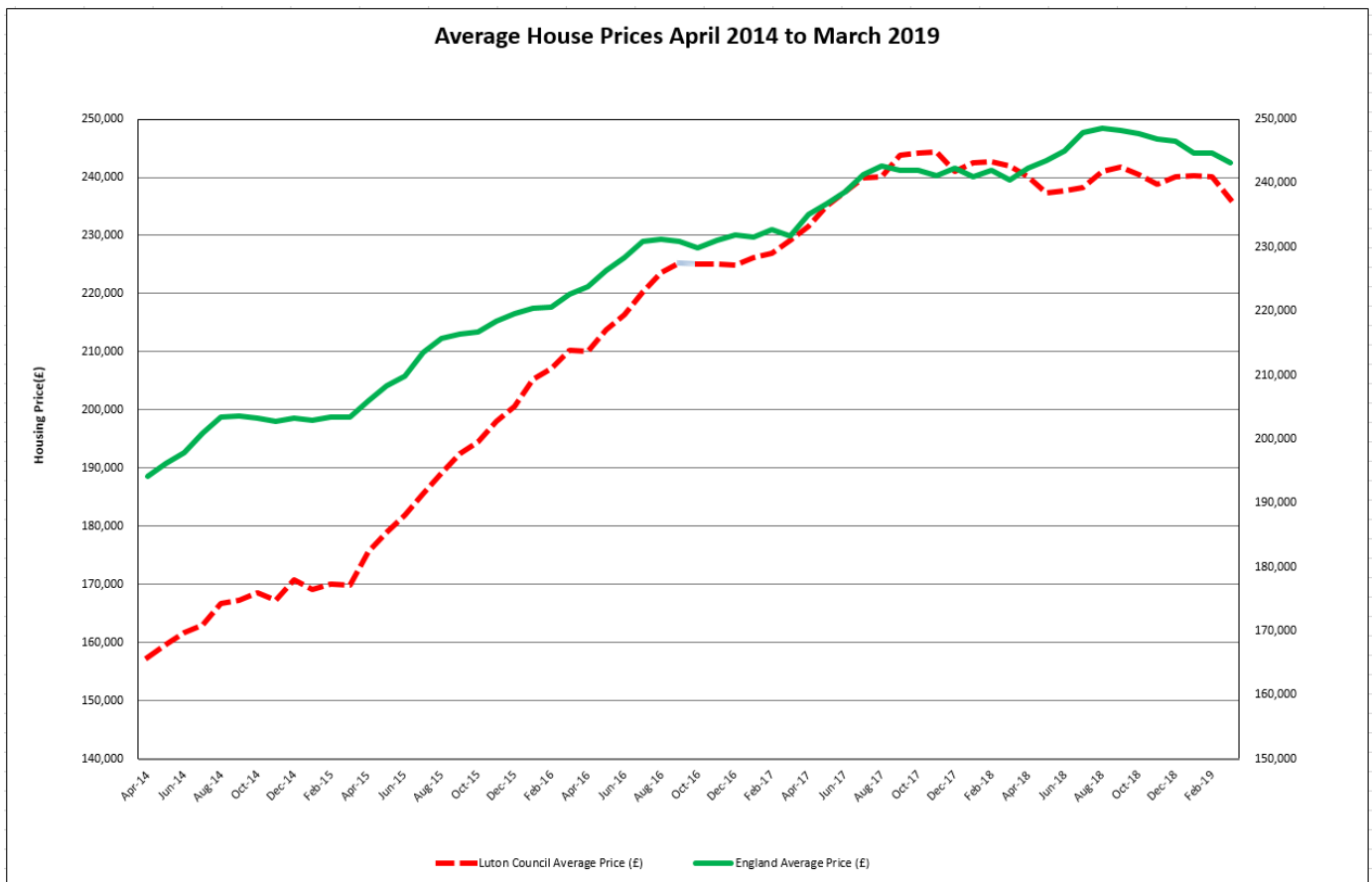
A major factor influencing the achievability of sites is their viability, which is largely dictated by market conditions.

To understand the current market and its implications, the following sources have been referred to:

- UK Housing Market Update, April 2019, Savills;
- House Price Index Report, Land Registry;
- Luton Borough Council Affordable Housing Viability Study, April 2013, Three Dragons;
- Luton Borough Council Local Plan Viability Assessment, October 2015, Nationwide CIL Service

House Prices

Until April 2015, average house prices in Luton have generally followed national trends and were approximately £30,000 below the average for England. Since then, average values increased more sharply in Luton until 2017, when they reached the national average. In the last two years, prices appear to have stabilised in Luton.



Local Viability Studies

The housing viability study conducted by Three Dragons in 2013 identified the following concerns:

- Lower densities are more viable than higher densities
- Flatted development in the town centre faces significant viability constraints
- Small sites are no less viable than large sites
- The use of Gleeds build costs generate greater viability than BCIS data

The local plan viability assessment conducted by NCS in 2015 considered the majority of sites in the housing land supply and concluded that all greenfield sites are viable. The delivery of some brownfield sites may require landowners to be realistic about value reductions to take account of abnormal development costs while the council may need to reduce affordable housing aspirations on a small number of high rise apartment sites to encourage development in the short term.

The National Picture

Savills produces regular bulletins on the national housing market. Its report from April 2019 provides the following key messages:

- House prices rose by 0.2% in March according to Nationwide
- Annual price growth accelerated across the North of England and Midlands but has slowed in London which showed the greatest fall, down 3.9% in the same year
- RICS survey has maintained its downward trend in both new instructions and enquiries

Implications

There are many other factors that affect viability, such as build costs, land values and availability of finance, which have not been considered in this market appraisal.

Considering the information available, the deliverability of flatted developments in the urban centre of Luton must be considered with an element of caution. Relevant concerns might, however, have been offset by the rapid increase in sales values since the local viability studies were undertaken.

The national signs that the market may slow seem to be reflected at the local level, with peak house prices having been seen in 2017 and now appear to have stabilised.

The viability of development impacts on the delivery of sustainable development. Where viability is tightly constrained, there is less likelihood of affordable housing and supporting infrastructure being provided. This has further impacts on the wider delivery of, and support for, sustainable communities.

Luton has significant requirements for the provision of affordable housing. When private-sector developments are unable to deliver against those requirements, the Council has previously sought to pursue innovative strategies to provide affordable homes through its own estate. Such options are limited, with historic approaches involving the loss of other important uses (e.g. valuable open space) that are important to retain to ensure a sustainable quality of life within the town.