PART 1a

Date: 10 January 2021

From: Ms Carolyn Cottier – East of Luton, Cockernhoe, Mangrove Green

Subject: North Hertfordshire District Council Local Plan Examination Hearing

<u>LUTON BOROUGH COUNCIL PERMISSIONS FOR RESIDENTIAL</u>

<u>DEVELOPMENTS NOT INCLUDED (AND THEREFORE ADDITIONAL) TO THE</u>

ADOPTED LOCAL PLAN 2011 – 2031.

Response To: Inspector's request (during Examination Hearing Matters 21 and 22) for additional evidence regarding Luton's housing land supply and current residential permissions existing but not being declared/ given allocation in the Luton Adopted Local Plan 2011 – 2031. And additionally, the same but not being declared in the 2019 SHLAA housing trajectory updating the Luton Adopted Plan 2011-2031.

IMPORTANT DISCLAIMER:

All of the screenshots within Parts 1a, 1b and 2 of this document, including offshore records is information available in the public domain on the date of 15 January 2021.

I am not responsible for any inaccuracies in the originally published material, but present it for Educational purposes only.

There can be complex schemes operated for various legal reasons.

There can be complex schemes operated for various illegal reasons.

I make no claims that fraud or financial misconduct has taken place.

I make no claims that fraud or financial misconduct has not taken place.

I present no conclusions as to the legality either way, nor do I present any explanation as to why these events have occurred or what the motivations behind them may be.

I draw no conclusions as to why land sites were registered offshore nor who registered them.

I place no obligations upon any reader as to how this information should be interpreted.

It is up to each individual to read the material and then decide for themselves.

All content is provided for education and information sharing purposes only.

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PART 1a – The Permitted Residential Developments of Luton Excluded from the Local Plan.

PART 1b – The Permitted Residential Developments of Luton Excluded from the SHLAA 2019

PART 2 – Historical Offshore Property Registration Records applied to the Permitted Residential Developments of Luton The evidence in this document provides the proof that from 1 January 2020 to 6 January 2021 there were 3,060 permitted additional residential developments that were NOT included in the Adopted Luton Local Plan.

Why were they not included?

It is a material consideration that so many residential developments have been permitted but remain additional to the Adopted Local Plan's claimed housing capacitylf these were to be included as they should now be, and should always have been, then there would be no need for false claims of "exceptional circumstances" and an East of Luton housing site to meet them.

3,060 residential permissions occurred, between 1 January 2020 – 6 January 2021, that have been give NO residential allocation in the Adopted Luton Local Plan ("ALLP"). All 3,060 are within Luton's own boundaries.

All are already available to meet "Luton's unmet need."

All are additional to the 114 cited windfall sites allowed within the ALLP.

All were permitted by Luton Borough Council's own Development and Control Committee.A further 648 residential permission occurred during that time which may or may not have been included in the Local Plan – it is unclear.

This represents only one year's worth of additional permitted residential allocations. Further un-included allocations also exist from other years following the Plan's adoption. We need to know how many there are from the other years also.

3,060 EXTRA residential dwelling permissions were only during one year's worth (1 January 2020 to 6 January 2021). Out of a total of 4,492 residential permissions granted over that brief period, only 784 of them had definitely been included/ counted as a contribution towards the official housing need within Luton and declared in the Adopted Luton Local Plan! An additional 648 were unspecified as being included in the Local Plan or not.

There would be even more if we were to conduct the same research for the other years prior.

Therefore the 2,100 dwellings for the East of Luton to meet "Luton's unmet need" have already been achieved from these omitted alternative and existent permissions within Luton's own curtilage.

This information is provided further to the request made by the Inspector for additional evidence, in the form of a chart, showing Luton's residential permissions during the period of January 2020 – January 2021. The Plan was adopted November 2017 on the condition of an early review. The deadline for the review to start was 2019, but the Council said it is not yet reviewing its Local Plan.

Many of the "undeclared land-sites" within Luton have been registered with various offshore companies in the past.

We do not know why they have been left out of the Local Plan even though they are now being developed.

We also do not know whether their offshore status is the reason they have been left out of the Adopted Local Plan.

The large number of undeclared land-sites within Luton, which were/ are also registered to offshore companies does not only relate to a large number of these residential developments, but also to many other land-sites. These are just the searches performed on the "permitted addresses" for this one year, so certainly there are many, many more.

One of the entries shows an offshore land site as registered to an address, which is then in the Luton Council's Commercial Register as an account registered and held by the Council's own Capital Assets Management Team at their address.

Something is occurring here. To find out exactly what it is will require more time. It affects Luton's so called "UNMET HOUSING NEED", "HOUSING CAPACITY", "LAND SUPPLIES", "LEGALITY" and "SOUNDNESS"

The historical offshore and ownership research continues in Part 1b and 2.

PART 1a – The Permitted Residential Developments of Luton Excluded from the Local Plan.

From Period 1 January 2020 – 6 January 2021 (details in chart below)

784	TOTAL NO. OF RESIDENTIAL DWELLINGS WHICH ARE INCLUDED IN ADOPTED LOCAL PLAN
648	TOTAL NO OF RESIDENTIAL DWELLINGS WHICH ARE UNSPECFIED (NEITHER INCLUDED OR EXCLUDED)
	INGLUDED OR EAGLUDED)
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3,060	TOTAL NO. OF RESIDENTIAL DWELLINGS NOT IN ADOPTED LOCAL PLAN

CHART COLOUR KEY:

BLUE background - These sites were EXCLUDED FROM THE 2019 SHLAA. Planning notes state they were given allocation in the Local Plan but then they were not in the SHLAA 2019.

WHITE background - These sites were NOT INCLUDED AS RESIDENTIAL ALLOCATIONS in Adopted Local Plan.

GREY background – These sites were residential allocations INCLUDED in Adopted Local Plan.

No/ Dwellings	Sizes	Application No. Address	If Included in Local Plan or Not	Permission Result	Access to full details
Erection of three storey building for 10 flats. APPLICANT: Mr E. Mahmutaji- Sheriff Builders	6 x 2-bed, 4 x 1-bed	Application No: 19/00748/FUL No. 123-135 Castle Street, Luton Ward: South	NOT IN ALLP. The site is on land unallocated in the Proposals Map of the Luton Local Plan 2011-2031.	8 January 2020 GRANTED	10. NO. 123-135 CASTLE STREET, LUTON (527Kb)
SEE APPENDIX 1					
Erection of three development blocks, with 349 residential units. APPLICANT: London Luton Residential Limited SEE APPENDIX 2	261 x 1-bed, 58 x 2-bed/ 3 person 26 x 2-bed/ 4 person 4 x 3-bed	Application No: 19/01597/MMAMD (Minor material amendment of Planning Permission ref: 16/01649/FUL dated 26 September 2017).	The application site is within an allocated housing site (Land opposite Whitbread	29 January 2020 GRANTED	8 Land Opposite Whitbread House, Flowers Way, Luton (542Kb) 8. Update to Report - Land Opposite Whitbread House, Flowers Way, Luton (269Kb)

		Land Opposite Whitbread House, Flowers Way, Luton Ward: South	House, Flowers Way) in the Luton Local Plan 2011-2031 Was only partly included in SHLAA; which included just 318 – so 31 have been added in the "Not in Plan" column of the "xls. Speadshreet".		
Erection of gawellings - 6 x semi-detached dwelling houses & 3 x flats within a three-storey building. APPLICANT: Mr J McMahon	4 x 3-bed houses, 2 x 4-bed houses, 3 x 2-bed flats	Application No: 19/01298/FUL 24A Wordsworth Road, Luton Ward: Lewsey	NOT IN ALLP. The site is unallocated on the Policies Map of the Luton Local Plan 2011-2031	29 January 2020 GRANTED	9.1. No. 24A Wordsworth Road, Luton (483Kb) 9.1. Update to Report - No. 24A Wordsworth Road, Luton (1240Kb)
Erection of 4 and 6 storey building, 43 flats. APPLICANT: Mr Westcott –The Property Shop SEE APPENDIX 3	43 x 2-bed flats.	Application No: 19/00889/FUL Nos. 27-37 Chapel Street, Luton Ward: South	IS IN ALLP The application site is within an allocated housing site (27 –37 Chapel Street) in the Luton Local Plan 2011-2031	20 February 2020 VISITED & GRANTED	11. NOS. 27- 37 CHAPEL STREET, LUTON (567Kb) SITES TO BE VISITED 26TH FEBRUARY 2019 (312Kb)
Change of use from hotel to 15 studio flats and erection of two storey rear APPLICANT: Kenexa Estate (Luton Ltd) SEE APPENDIX 4	15 x studio	Application No: 19/01632/REMCON (Permitted Application No: 98/01208/FUL Dated 8 January 1999). No. 296-298 Dunstable Road, Luton	NOT IN ALLP. The site is unallocated on the Policies Map of the Luton Local Plan2011-2031.	GRANTED	12. NO. 296-298 DUNSTABLE ROAD, LUTON (380Kb)
Erection of 3 storey building for 19 flats. APPLICANT: Mr Alistair Rokas	7 x 1-bed, 12 x 2-bed.	Ward: Biscot Application No: 19/01104/OUT Nos. 181-193 Park Street, Luton Ward: South	NOT IN ALLP. The site is unallocated on the Policies Map of the Luton Local Plan2011- 2031.	20 February 2020 VISITED & GRANTED	13. NOS. 181-193 PARK STREET, LUTON (492Kb) SITES TO BE VISITED 26TH FEBRUARY 2019 (312Kb)

Erection of 32 dwellings. APPLICANT: Luton Borough Council.	32 x 4-bed Town Houses, 8 x garages	Application No: 19/00925/FUL Taylor Street, Car Park, Taylor Street, Luton Ward: High Town	IN ALLP Site is situated within the High Town Strategic Area as identified on the Policies Map of the Luton Local Plan2011-2031. BUT this site was not included in the 2019 SHLAA.	26 February 2020 GRANTED	14. TAYLOR STREET CAR PARK, TAYLOR STREET, LUTON (813Kb)
Construction of 50 apartments. APPLICANT: Emirates Investments Ltd & Zarut Ltd	21 x 1-bed, 23 x 2-bed, 6 x 3-bed	Application No: 20/00135/FUL Nos. 16 -22 Rothersay ROAD, LUTON Ward: South	NOT IN ALLP. The site is on unallocated land within the Local Plan.	25 March 2020 GRANTED WITH CONDITIONS	9. NOS. 16 - 22 ROTHESAY ROAD, LUTON (1201Kb)
Erection of a building comprising of 46 flats and 2 retail units. APPLICANT: Mr Nabeel Khalid, Capital Uplift Ltd.	11 x 1-bed, 35 x 2-bed	Application No: 19/01540/MMAMD (Permission 11 July 2018 Ref: 17/01004/FUL) No 27A Upper George Street, Luton Ward: South	Site is located within the Central Area as identified on the Proposals Map of the Luton Local Plan 2011-2031. Part of site is located within the Town Centre Conservation Area and the site is an allocated housing site.	25 March 2020 GRANTED	10. NO. 27A UPPER GEORGE STREET, LUTON (566Kb)
26 residential units APPLICANT: Mr Robert Dennis, Acre Investment Luton, Limited. SEE APPENDIX 5	22 X 2-bed, 4 X 3-bed	Application No: 19/01159/FUL 60-64 Collingdon Street, Luton Ward: South	NOT IN ALLP. Not in Adopted Local Plan as a residential allocation. Situated within the Town Centre Area and Category 'B' Employment Area therein.	25 March 2020 GRANTED	11. NOS. 60-64 COLLINGDON STREET (853Kb)
Erection of a three storey building comprising of 11 flats. APPLICANT: 1MT Ltd	11 x 2-bed	Application No: 19/01427/FUL 48 Crawley Green Road, Luton Ward: Crawley	NOT IN ALLP. The site is unallocated on the Policies Map of the Luton Local Plan 2011-2031	25 March 2020 GRANTED	ERAWLEY GREEN ROAD (531Kb)

Erection of seven storey building for 16 Flats APPLICANT: MR Nehal Patel – Mansaee Investments Limited	5 x 1-bed, 11 x 2-bed	Application No: 19/01358/FUL 7A Old Bedford Road, Luton Ward: High Town	NOT IN ALLP. The application site is unallocated on the Policies Map of the Luton Local Plan 2011-2031.	6 May 2020 GRANTED	7. NO. 7A OLD BEDFORD ROAD, LUTON (459Kb)
*Counted as "unspecified" Erection of up to 48 residential units APPLICANT: Luton Borough Council	12 x 2-bed, 13 x 3-bed, 22 x 4- bed, 1 x 2-bed apartment	Application No: 17/00791/OUT DATED 17 October 2019, 19/01183/REM The Orchard Centre, Strangers Way Ward: Leagrave	IS MOSTLY IN ALLP. The majority of the application site is identified on the Policies Map and in Appendix 4 of the Local Plan as an allocated housing site. SOME NOT IN ALLP *Counted as "unspecified"	6 May 2020	8. THE ORCHARD CENTRE, STRANGERS WAY, LUTON (353Kb)
Redevelopment to provide 179 residential units. APPLICANT: Burr Street Ltd	-88 X 1-bed, 66 X 2-bed, 24 X 3-bed, 1 X 4-bed	Application No: 18/01840/FUL Nos 4-11 Burr Street, Luton Ward: High Town	The Local Plan sets out that High Town can accommodate at least 750 new residential units over the course of the Local Plan period with that figure updated to 840 dwellings by the July 2016 Strategic Housing Land Availability Assessment. The proposal is thus considered to accord with the strategic allocation for High Town by providing a significant amount of residential accommodation. BUT this site was not included in the 2019 SHLAA.	6 May 2020 REFUSED DUE TO NOT HAVING APPROPRIATE MIX & AFFORDABLE. REVISION REQUIRED	10. NOS. 4-11 BURR STREET, LUTON (210Kb) 1. 10. Appendix 1 - Report of the Officer - Approval (August 2019) (439Kb) 2. 10. Appendix 2 - Report of the Officer - Refusal (October 2019) (217Kb)
Erection of five x four to six-storey buildings for	68 x 1-bed, 24 x 3-bed, 1 x 4-bed,	Application No: 20/00567/FUL	IS IN ALLP. The site is allocated within	29 July 2020 RESUBMITTED	11 NO. 4-11 BURR STREET, LUTON (1078Kb)

FOLLOWING DEMOLITION OF EXISTING BUILDINGS (RESUBMISSION). APPLICANT: Burr Street Ltd SEE APPENDIX 6		No. 4-11 Burr Street, Luton Ward: High Town	the High Town Strategic Area on the Policies Map of the Luton Local Plan 2011-2031. Policy LLP15, as regards the development, relates to the provision of housing within the Borough. BUT this site was not included in the 2019 SHLAA.	& GRANTED	(Report of the Head of Development Management) 1. 11. Appendix 1 (105Kb) 2. 11. Appendix 2 (14Kb)
273 rooms for student and academic staff accommodation. Erection of new buildings, demolition of existing buildings and redevelopment. APPLICANT: Campus Living Villages	The 273 units comprise a mixture of multiple-occupancy 'flats' and self-contained studios.	Application No: 20/00104/REMCON Manor Court, Manor Road, Luton Ward: South	NOT IN ALLP The site is unallocated on the Policies Map of the Luton Local Plan 2011-2031.	28 May 2020 GRANTED (Previous Planning Permission No. 08/01047/FUL Dated 23 October 2008).	7 MANOR COURT, MANOR ROAD, LUTON (131Kb)
Erection of 110 residential dwellings. Up to 110 family sized dwellings and an area of communal open space. APPLICANT: West Herts College	21 affordable. 106 mix: 4 x 5-bed (Detached type A) 14 x 5-bed (Detached type B) 9 x 4-bed (Detached type C) 11 x 3-bed (Detached type D) 44 x 3-bed (Semi detached) 24 x 3-bed (Townhouse)	Application No: 20/00108/OUT Barnfield College, New Bedford Road, Luton Ward: Barnfield	NOT IN ALLP. The application site is not allocated for any specific land use in the Luton Local Plan 2011-2031	28 May 2020 GRANTED	8 BARNFIELD COLLEGE (OUTLINE RESIDENTIAL APPLICATION), NEW BEDFORD ROAD, LUTON (1074Kb)
Unspecified but previously planned 127 dwellings: (88-bed facility and 39 residential units). Demolition of existing buildings and erection of college accommodation. APPLICANT:	Not specified but room for at least 127 as previous application 12/00751/OUT 'Proposed phased redevelopment to provide replacement college facility, new primary school, a new 88-bed care home facility, and	Application No: NO: 20/00111/FUL Barnfield College, New Bedford Road, Luton Ward: Barnfield	NOT IN ALLP. The application site is not allocated for any specific land use in the Luton Local Plan 2011-2031.	28 May 2020 GRANTED	9 BARNFIELD COLLEGE (FULL REDEVELOPMENT APPLICATION), NEW BEDFORD ROAD, LUTON (1462Kb)

West Herts College	up to 39 residential units.				
14 en-suite bedrooms with communal facilities and office space for managerial staff. Change of use of from hotel (Class C1) to transitional housing scheme functioning as an HMO (Sui Generis) APPLICANT: Central Bedfordshire Council	14 x en-suite bedrooms Application site comprises front part of the wider Formal Old Naval Club Site, which has since been redeveloped to provide flats to the rear and a hotel/bed and breakfast within the extended and refurbished former Club building.	Application No: 19/01087/COU 124 Crawley Green Road, Luton Ward: Crawley	NOT IN ALLP. The site is unallocated on the Policies Map of the Luton Local Plan 2011-2031.	28 May 2020 CONDITIONAL APPROVAL	10.1. 124 CRAWLEY GREEN ROAD, LUTON (76Kb) 1. 10.1. Appendix 1 (554Kb) 2. 10.1. Appendix 2 (1921Kb) 3. 10.1. Appendix 3 (1066Kb) 4. 10.1. Appendix 4 (2158Kb)
Erection of x 3-bedroom dwelling houses. APPLICANT: Property and Construction, Luton Borough Council	3 x 6-person houses.	Application No: 20/00054/FUL Land on the Corner of Morris Close and Northwell Drive, Luton Ward: Northwell	NOT IN ALLP. The site is unallocated on the Policies Map of the Luton Local Plan 2011-2031	28 May 2020 GRANTED	10.2. MORRIS CLOSE AND NORTHWELL DRIVE, LUTON (565Kb) 1. 10.2. Appendix 1 (561Kb)
Erection of two storey roof extension to Northern part of existing building. APPLICANT: Mr Paul Forster – SUSD LTD	4 x 2-bed, 6 x 3-bed,	Application No: 20/00393/FUL Britannia House, Leagrave Road, Luton Biscot Ward	NOT IN ALLP AS RESIDENTIAL. The site is allocated for mixed-use development on the Policies Map of the Luton Local Plan2011-2031.	1 JULY 2020 GRANTED	8 Britannia House, Leagrave Road, Luton (831Kb)
*Counted as "unspecified" De-Culverting of the River Lea, formation of new public space, after demolition of existing car park. APPLICANT: Luton Borough Council SEE APPENDIX 7		Application No: 20/00489/FUL Silver Street Car Park, off of Bute Street, Luton. South Ward	NOT IN SHLAA 2019. The application site is allocated as being within the Plaiters Lea Conservation Area and within the Northern Gateway site of the Creative Quarter, where Policy LLP11 of the Luton Local Plan 2011-2031 applies. Policy LLP11 states	1 July 2020 GRANTED	9 Silver Street Car Park, off of Bute Street, Luton (1222Kb)

			that "The Council will work with developers, landowners and stakeholders to transform the Creative Quarter into a thriving mixed use area with 600 residential units, a café culture and night-time economy, appropriate mix of restaurants, galleries, retail, leisure, education facilities and creative businesses and an excellent quality public realm".		
Erection of five storey block providing 19 flats. APPLICANT: Mr Singh	14 x 2-bed, 5 x 1-bed	Application No: 19/01363/FUL The Old English Gentleman, 17 Hitchin Road, Luton.	IS IN ALLP. BUT this site was not included in the 2019 SHLAA. The application site is within an area identified on the Policies Map of the Luton Local Plan as being within the strategic allocation for High Town.	GRANTED	10 The Old English Gentleman, No. 17 Hitchin Road, Luton (777Kb)
1,000 Residential Units (including affordable Class C3) Demolition of existing buildings & construction and flexible commercial and community floorspace, landscaping. APPLICANT: HAYWARD TYLER SEE APPENDIX 11	200 x affordable units (20%) Overall mix of 1000: Studio = 10% 1-bed = 33% 2-bed = 37% 3-bed = 20%	Application No: 20/00147/OUT Hayward Tyler, 1 Kimpton Road, Luton	NOT IN ALLP The application site was not previously allocated as residential in Adopted Local Plan. It was a Category A Employment Area on the Proposals Map of the Luton Local Plan 2011-2031.	1 July 2020 GRANTED (Delivery over 5 years)	11 Hayward Tyler 1 Kimpton Road Luton (2173Kb)

10 new dwellings RESUBMISSION Conversion of former D1 use class space and plant room at second level to change to residential, with additional third floor and additional space on second. APPLICANT: Mr P Modwhadia, PRAGMA HOMES LTD	2 x 1-bed, 6 x 2-bed, 2 x 3-bed	Application No: 19/01498/FUL Luton Mall, 46 George Street, Luton	NOT IN ALLP The site is on land unallocated in the Proposals Map of the Luton Local Plan 2011-2031. This site was also not included in the 2019 SHLAA.	29 July 2020 GRANTED	7 LUTON MALL, 46 GEORGE STREET, LUTON (267Kb) (Report of the Head of Development Management) 1. 7. Appendix 1 (90Kb)
Erection of 49 dwellings (28 flats & 21 houses) APLICANT: Whitbread PLC	28 flats: 7 x 1-bed, 18 x 2-bed, 3 x 3-bed 21 houses: 6 x 2-bed, 8 x 3-bed, 7 x 4-bed,	Application Number: 19/01630/OUT Oakley House, 213 Oakley Road, Luton	NOT IN ALLP The application site is undesignated in the Local Plan and is currently used for employment.	29 July 2020 GRANTED (Development will result in the loss of an unallocated employment site, however, prior approval was granted).	8 OAKLEY HOUSE, 213 OAKLEY ROAD, LUTON (508Kb) (Report of the Head of Development Management) 1. 8. Appendix 1 (75Kb)
Conversion of existing premises & erections of single storey rear extension. APPLICANT: Mr M Nasar, AMA Investments Ltd SEE APPENDIX 8	7 x 2-bed, 3 x 1-bed,	Application No: 20/00203/FUL 4 George Street West, Luton.	IS IN ALLP The site is located within the Central Area as identified on the Proposals Map of the Luton Local Plan 2011-2031. Part of the site is located within the Town Centre Conservation Area and the site is an allocated housing site.	29 July 2020 GRANTED	10 4 GEORGE STREET WEST, LUTON (168Kb) (Report of the Head of Development Management)
19/01646/FUL: Erection of 15 dwelling houses with associated car parking and external works (Resubmission). APPLICANT HIDDEN	9 x 4-bed, 6 x 5-bed	Application No: 19/01646/FUL Land at Freeman's Green, Sherd Close, Luton. Northwell Ward	NOT IN ALLP. No allocation in Local Plan	26 August 2020 Granted subject to the conditions as set out in 'Appendix 1' of report.	7 Land at Freeman's Green, Sherd Close (73Kb) (Report of the Head of Development Management) 1. 7. Appendix 1 - Conditions Land at Freeman's

					Green, Sherd Close (56Kb) 2. 7. Appendix 2 - Original Report dated 29th July 2020 (1620Kb)
Conversion and change of use of Hat Factory and temporary homeless accommodation and erection of side and roof extensions to main building and erection of a three storey building, associated access and landscaping, following demolition of existing extension and buildings. APPLICANT HIDDEN	21 x 2-bed, 10 x 1-bed	Application No: 20/00386/FUL Adjacent to Old Bedford Road, predominantly comprises a threestorey hat factory situated on the eastern side of Old Bedford Road, nestled between Clarendon Road to the north and Reginald Street to the south. The built form within the site is setback from Old Bedford Road and bounders the rear of properties within Clarendon Road along the northern boundary of the site. A two storey office building, presently accommodating the charity 'Signposts', resides on the southern side of the site adjacent to properties within Reginald Street.	NOT IN ALLP. The application site does not benefit from any specific allocation within the Luton Local Plan 2011-2031, however, constitutes an 'unidentified employment site'.	26 August 2020 Conditional approval of the application, which shall be subject to a viability review mechanism.	9 Olney Headware Ltd., 106 Old Bedford Road (453Kb) (Report of the Head of Development Management) 1. 9. Appendix 1 Olney Headware Ltd., 106 Old Bedford Road (51Kb) 2. 9. Appendix 2 Olney Headware Ltd., 106 Old Bedford Road (18Kb) 3. 9. Appendix 3 Olney Headware Ltd., 106 Old Bedford Road (18Kb) 3. Olney Headware Ltd., 106 Old Bedford Road (18Kb) 3. Appendix 3 Olney Headware Ltd., 106 Old Bedford Road (19Kb)
apartments. Erection of a nine storey building. APPLICANT HIDDEN BUT NEXTDOOR TO OFFSHORE COMPANY REGISTERED AS "LALI ENTERPRISES	73 x 1 bed, 71 x 2 bed, 10 x 3 bed	Application No: 20/00281/FUL NO EXACT ADDRESS GIVEN IN COUNCIL NOTES Site situated to the north of the Park Viaduct (A505) dual carriageway, which forms part of the	NOT IN ALLP. North-west side of Cumberland Street, within the defined 'Castle Quarter' in the Local Plan. Not residential in Local Plan.	26 August 2020 Permission Granted	10 Former Honda Site, Cumberland Street (938Kb) (Report of the Head of Development Management) 1. 10. Appendix A - Former Honda Site, Cumberland

LIMITED", IN LIBERIA – BUT PROVIDED BUILDING BOUNDARIES STAY SAME, SEEMS TO BE SEPARATE FROM MAPS BUT NO ADDRESS GIVEN.		ring road around the town centre.			Street (102Kb)
SEE APPENDIX 9 2 dwellings Demolition existing derelict house & garage. APPLICANT: Mr Warfield	2 x 3-bed	Application No: 20/00705/FUL (incorporates with 19/00489/FUL) Woodbury, Woodbury Hill Path, Luton WARD: Round Green	NOT IN ALLP No residential allocation in Luton Local Plan. Within Bradgers Hill Corridor Area of Great Landscape Value within ALLP	Resubmission 30 September 2020 (Previously: 20/00155/FUL) GRANTED	Woodbury, Woodbury Hill Path, Luton Applicant: Round Green 9 Woodbury, Woodbury Hill Path, Luton (1370Kb)
Change of use from student residential (Sui Generis) to student residential and coliving APPLICANT: London Luton New Street Student Accommodation Ltd	560 x 1-bed	Application No: 20/00908/FUL	NOT IN ALLP. No allocation in Adopted Local Plan	30 September 2020 (previously granted planning permission in December 2016 ref: 16/01253/FUL) GRANTED	10. Opto Village, Nos 1-2 Spring Place and 4-16 Dumfries Street, Luton; 10. 10a. & 10b Opto Village - Nos 1-2 Spring Place and 4- 16 Dumfries Street, Luton; Nos 21-25 Chapel Street, Luton and Nos. 146-158 Park Street, Luton (265Kb)
London Luton New Street Student Accommodation Ltd	87 x 1-bed	Application No: 20/00909/FUL Change of use from student residential (Sui Generis) to student residential and co-living	NOT IN ALLP. No allocation in Adopted Local Plan	30 September 2020 (planning permission in 2014 (ref: 14/00005/FUL) GRANTED	10a. Nos 21-25 Chapel Street, Luton (pdf above)
Change of use from student residential (Sui Generis) to student residential and coliving APPLICANT: London Luton New Street Student Accommodation Ltd	147 x 1-bed		IS IN ALLP. Has housing allocation in Adopted Local Plan	30 September 2020 20/00910/FUL	10b. 146-158 Park Street, Luton (pdf above)

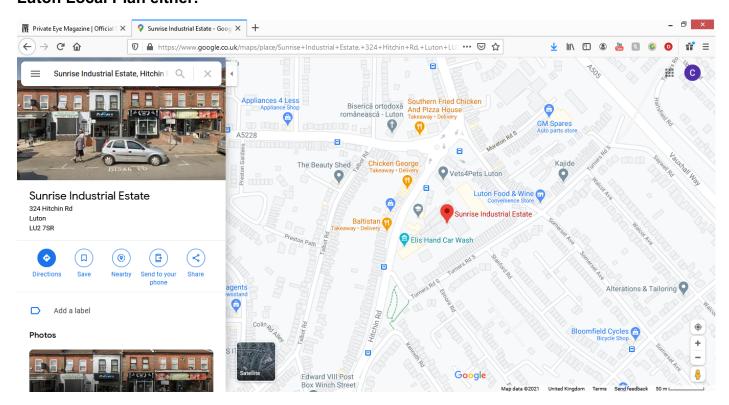
				30 September 2020	11 Courtyard by Marriott London Luton Airport, Airport Way, Luton, LU2 9LF (750Kb)
273 units student accommodation Temporary (2yrs) change of use of the buildings from student accommodation to flexible hotel/student accommodation use. (Relevant to 97 rooms situated within Jubilee Hall, which is located at the centre of the site. Further expansion of the use into other buildings within the site would potentially occur) APPLICANT: Campus Living Village	Mixture/ multiple- occupancy 'flats' & self-contained studios	Application No: 20/00498/TEMP	NOT IN ALLP No allocation in Adopted Local Plan	30 September 2020	north-western side Manor Court, Manor Road, Luton 12 Manor Court, Manor Road, Luton (379Kb)
Erection of a three storey roof extension to provide 28 flats. APPLICANT: NOT NAMED SEE APPENDIX 10	9 x 1-bed, 17 x 2-bed, 2 x 3-bed	Application No: 20/00514/FUL Cresta House, Alma Street, Luton Large 7/8 storey building located on the north-western side of Alma Street, adjacent to its intersection of New Bedford Road. Cresta House occupies a site of 0.55 hectares. Flat maps: x,x,x,8,x,7,2 to 6,x,3,5 Ward: South	NOT IN ALLP No residential allocation in Adopted Local Plan Only Category 'A' Employment Area located within the Town Centre Area	30 September 2020 GRANTED WITH CONDITIONS	Cresta House, Alma Street, Luton, South ward 13 Cresta House, Alma Street, Luton (1286Kb)
APPLICANT: Luton Borough Council	7 x 1-bed, 19 x 2-bed 8 x 3-bed	Application No: 20/00764/FUL Former Children's Home, Buckle Close, Luton Ward: Northwell	NOT IN ALLP No residential allocation in Adopted Local Plan Within Bradgers Hill Corridor Area of Great	28 October 2020 GRANTED	8. Former Children's Home, Buckle Close, Luton (455Kb) Vacant parcel of land of approximately 4131 sq. metres on a

3 flats APPLICANT: Luton Borough Council	2 x 1-bed 1 x 2-bed	Application No: 19/00489/FUL Former Children's Home, Buckle	Landscape Value within ALLP NOT IN ALLP. No residential allocation in Adopted Local Plan	28 October 2020 GRANTED	prominent corner on the junction of Buckle Close and Northwell Drive on land allocated under the Luton Local Plan as the Marsh Farm Central Area 8. Former Children's Home, Buckle Close, Luton (455Kb)
		Close, Luton Ward: Northwell			
APPLICANT: Foxhall Homes Ltd (Luton Borough Council's own urban development corporation)	9 x 2-bed maisonettes, 4 x 2-bed, 16 x 3-bed, 29 x 4-bed 2 x 5-bed	Application No: 19/01233/FUL 19/01233/FUL	NOT IN ALLP No residential allocation in Adopted Local Plan A designated neighbourhood park	2 Dec 2020 GRANTED	Land adj to Wandon Close, Luton, LU2 8DX 7 Land adj to Wandon Close Luton (656Kb)
Erection of a four storey building comprising 40 flats.	14 x 1-bed, 22 x 2-bed, 4 x 3-bed	Application No: 20/00706/FUL Land at Former Leagrave Service Station, High Street Leagrave, Luton Ward: Leagrave	NOT IN ALLP Not a residential allocation in Adopted Local Plan. Identified on the Policies Map of the Luton Local Plan 2011-2031 as a Category 'A' Employment Area located within the Town Centre Area.	6 January 2021 GRANTED	8 Land at Former Leagrave Service Station, High Street Leagrave, Luton (1358Kb)
784	TOTAL NO. OF RESIDENTIAL DWELLINGS WHICH ARE INCLUDED IN ADOPTED LOCAL PLAN				
648	TOTAL NO OF RESIDENTIAL DWELLINGS WHICH ARE UNSPECFIED (NEITHER INCLUDED OR EXCLUDED)				

3,060	TOTAL NO. OF RESIDENTIAL DWELLINGS NOT IN ADOPTED LOCAL PLAN		
4,492	GRAND TOTAL - included, unspecified and not included in Local Plan.		

<u>ADDITIONALLY: SUNRISE INDUSTRIAL ESTATE</u>

All of the occupants at Sunrise Industrial Estate, Hitchin Road, Luton received written notification at the end of 2020, saying that the site was going to be turned into a residential development. This is a huge site and has been there for many years. The tenants were told to seek alternative premises. This site was not included as an allocation in the Adopted Luton Local Plan either.



PART 1b

PART 1b – The Permitted Residential Developments of Luton Excluded from the SHLAA 2019

NHDC, Bloor Homes and Crown Estates have constantly argued that we should stick to the Adopted local Plan with the figures in it.

We have placed a lot of emphasis on needing to look at the figures up to date and that LBC's Inspector required them to conduct an early review.

LLP40 requires them to start a review by the end of 2019 and have it ready for mid-2021. If they haven't done it or don't intend to, then that is a big problem.

If we take the 2019 SHLAA as an update on the figures that gives us a higher starting point than the Adopted plan and much more credence to its accuracy.

They produced it. The 2019 SHLAA also postponed the build on Luton Town FC so that can't be eliminated.

From the 2019 SHLAA figure of 10,903 we can easily build to 13,963 – 14,611 dwellings with the figures from Part 1a - 3,060 - 3,708 as extra and an allowance for the period 1 April 2019 to 31 December 2019. But we haven't even looked at the other years' of permissions yet, not included in the Local Plan or SHLAA 2019. That would give us even more.

The adopted Local Plan figures are based on the 2016 SHLAA, which again based its figures in the SHMA of summer 2015.

That means it is fair to argue that the 2017 adopted Local Plan is out of date.

Going from the 2019 SHLAA the only thing we need to know is whether the new permissions are in the trajectory which produces that...and we now know at least 3,060 – 3,708 weren't and so need to be added.

It is important to see what wasn't in the 2019 SHLAA and then add it to the 2019 SHLAA figures.

The most certain way to know that the adopted local plan needs updating is using the most current figures which is exactly what we have done.

We also provide a breakdown of the extra permissions in a spreadsheet attached. We show the number of bedrooms they are focusing on. The Council needs to change their policy if they want to have a greater proportion of them be three and four bedroom places. It is a basic policy issue, not requiring Green Belt release to resolve.

See "Analysis (R1) of Luton Planning grants 2020 - Coloured.xlsx"

CONCLUSION

A VERY SIGNIFICANT NUMBER OF LAND SITES, ABLE TO CONTAIN MANY THOUSANDS OF DWELLINGS, HAVE BEEN PURPOSEFULLY EXCLUDED FROM THE ADOPTED LUTON LOCAL PLAN AND ITS HOUSING CAPACITY FIGURE ALTOGETHER.

RESIDENTIAL DEVELOPMENTS PERMITTED UPON LAND WITHIN LUTON BOROUGH ARE THEREFORE A MATERIAL CONSIDERATION TOWARDS THE LUTON HOUSING LAND SUPPLY AND HOUSING NEED FIGURES. THESE SITES SHOULD ALL HAVE BEEN THOROUGHLY LISTED IN THE FORM OF A HELAA REGISTER OF LAND-SITES AS PPG STATES.

THE LAND EXISTED AS LAND REGISTRATIONS AT THE START OF THE PLAN-MAKING PROCESS AND SHOULD HAVE BEEN INCLUDED AS LAND OPTIONS DURING THE EARLIEST PLAN PREPARATION STAGES AND ALL STAGES THEREAFTER.

The Inspector needs to consider carefully - because Luton's housing and land capacity is under his remit only in so far as it has genuine or disingenuous relevance to the NHDC Local Plan's "East of Luton Strategic Housing Site". With such a large number of existing but excluded dwellings, should he not perhaps be passing this information additionally to the other Inspectors for the shared Housing Market Area?

After having viewed the material, a decision will need to be made by the Inspector whether or not it could be relevant to the current Police enquiries underway – see Press Releases in Appendix 15/ Part 2. Back in June 2020 it was announced by the Press that, one million and one hundred thousand pounds had gone missing from Luton Borough Council's account, hence sophisticated fraud investigations were launched into where it had gone. I am not saying that any of these offshore land assets have any additional implications in relation to any of that. It is for the Inspector to consider and decide whether offshore channels are relevant to those official enquiries published in the Press.

But regardless of all of that, does the Inspector want a NHDC Local Plan that is based wholly on true land supply data, or would he rather have a Local Plan that omits land supply sites without justification? In both NHDC and Luton's cases, does he want to accept the omission of a Housing Economic Land Availability Assessment —or does he want to call upon both councils to fairly and honestly declare ALL of their land supplies in line with the PPG's instructions? Does he want to make sure they are listing both onshore and offshore registered land-sites or does he want to allow them to just be denied and hidden?

Thus far so many land-sites which are un-included in the Local plan appear to be offshore – although not all of them. Some are not offshore but are also STILL NOT declared within the Local Plan and SHLAA 2019!

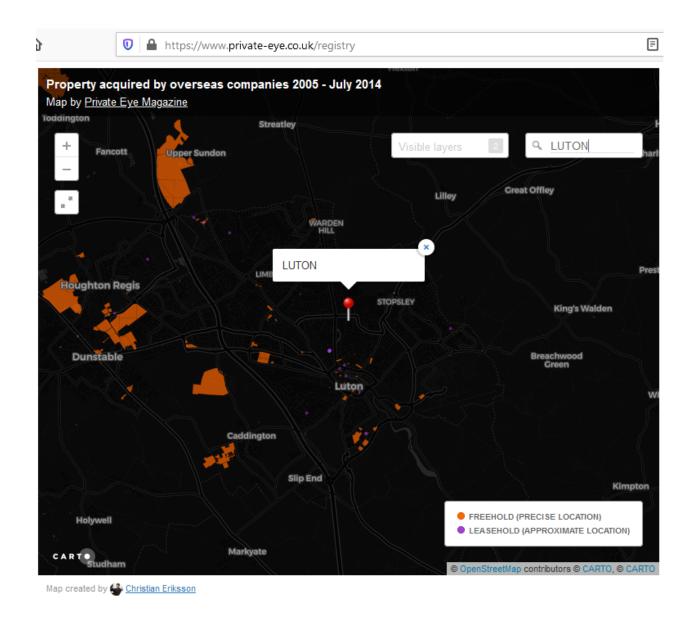
So regardless of whether they are registered offshore or not, all permitted developments must be accounted for, and if they exist then this gives an entirely DIFFERENT Luton Housing Capacity figure.

Finally if "whatever is happening" in Luton is happening, how do we know it isn't happening elsewhere?

The old Adopted Luton Local Plan is already out of date, and it never was accurate. Luton has missed its early review deadline already – so officials have no excuse for allowing this state of affairs to persist.

Here is a big screenshot of the offshore map for Luton. The orange areas are the offshore freehold land-sites. There are many.

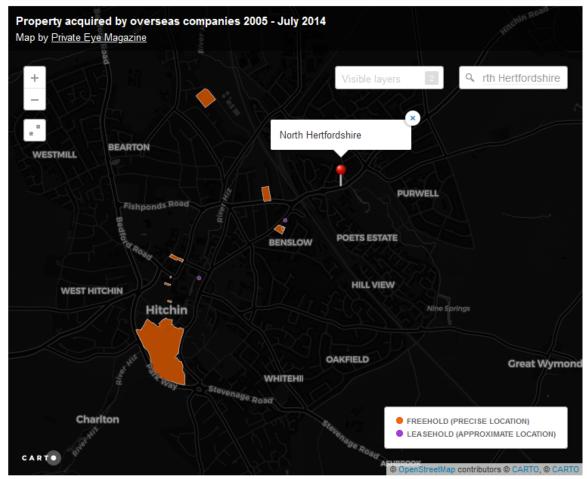
It can be searched directly at: https://www.private-eye.co.uk/registry



You can zoom in:

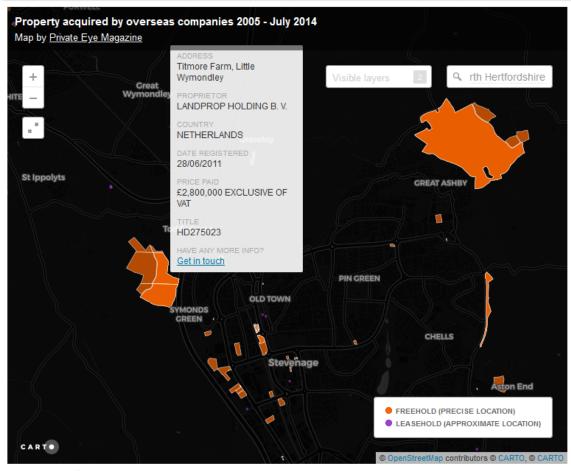
 \blacksquare

Map created by Schristian Eriksson



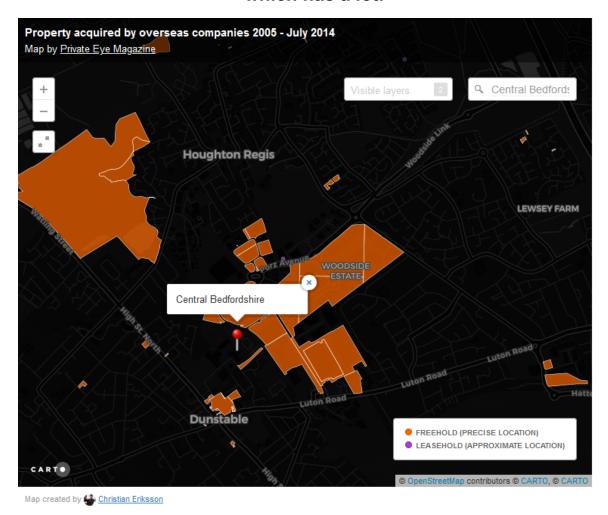
Map created by 4 Christian Eriksson





Map created by 🍪 Christian Eriksson

Or even other areas of the Housing Market Area such as Central Bedfordshire – which has a lot!



PART 2 - Historical Offshore Property Registration Records applied to the Permitted Residential Developments of Luton

APPENDICES 1-15

APPENDIX 1:

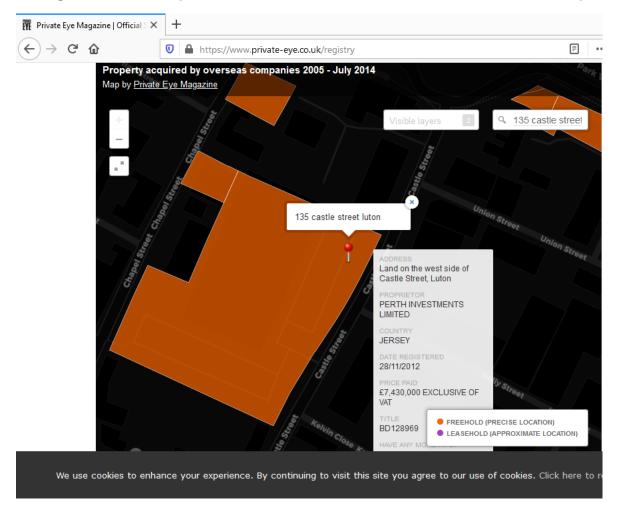
Erection of three storey building for 10 flats.	6 x 2- bed, 4 x 1- bed	Application No: 19/00748/FUL No. 123-135 Castle	The site is on land unallocated in the Proposals Map of the Luton Local Plan 2011-2031.	8 January 2020 GRANTED	10. NO. 123-135 CASTLE STREET, LUTON (527Kb)
APPLICANT:		Street, Luton		0 22	
Mr E. Mahmutaji-					
Sheriff Builders		Ward: South			

This site for a three storey building containing 10 flats was given no allocation within the Luton Local Plan.

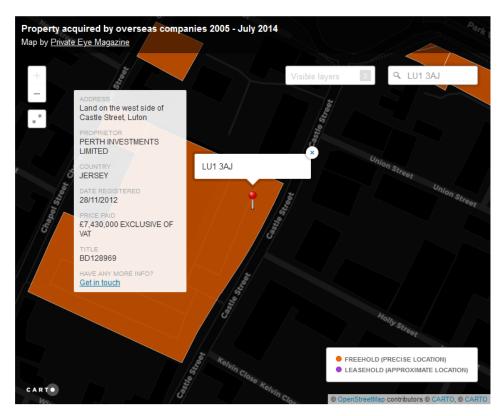
However from offshore records there is an entry for this address.

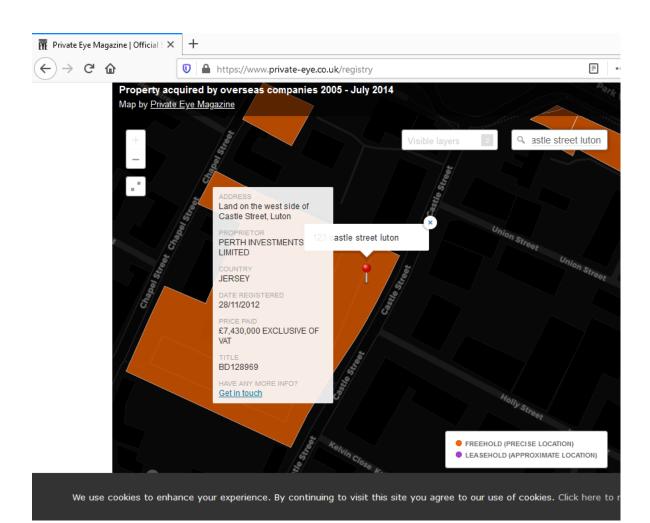
135 Castle Street is within a much larger land title called "Land on the west side of Castle Street, Luton". Proprietor is PERTH INVESTMENTS LIMITED in Jersey. The entire land title reference is: BD128969. It was sold for: £7,430,000 excluding VAT.

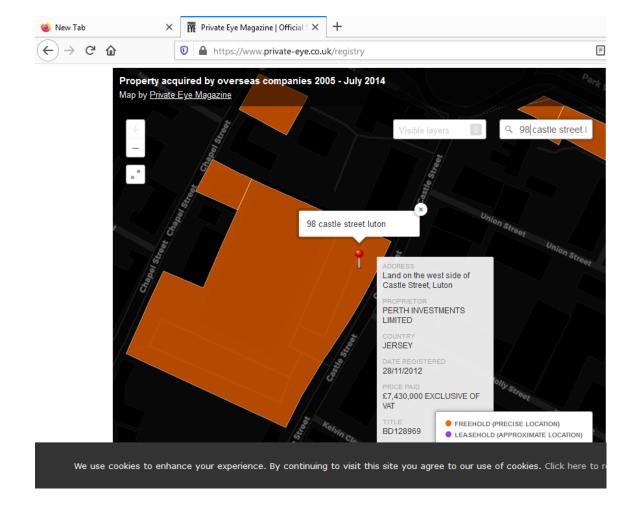
Perth Investments Limited in Jersey was used to register it offshore on 28 November 2012 during the Luton Adopted Local Plan's and NHDC Submitted Local Plan's period.











We can find that the "98 Castle Street, Luton" address is <u>also</u> held by Perth Investments Limited, offshore in Jersey as a part of this offshore land title BD128969, and was included in this total value of £7,430,000 excluding VAT, see above.

Further information can also be obtained by cross-correlating this offshore information with an entry within Luton Borough Council's registers which was submitted as an NHDC Examination Document. See: "MATTERS-29,21,22-ADDENDUM-EvidenceAppendix-Commercial-properties-with-a-rateable-value-over-10k-(including-reliefs)-v.12Feb2020.xls"

Within the Luton Borough Council's Commercial Properties Register – for properties with a Rateable Value Over 10k-(including-reliefs).v12Feb2020, a primary account holder name and address is given as an unnamed individual; "Private Individual" with details of the entry below.

MATTERS-29,21,22-ADDENDUM-EvidenceAppendix-					
Commercial-propertie	es-with-a-rateable-value-over-				
10k-(including-reliefs)	-v.12Feb2020.xls				
propref	201014010097013				
account holder1	Private Individual				
account holder2	Private Individual				
holder addr1	97-99				
holder addr2	Castle Street				

holder addr3	Luton Bedfordshire
holder addr4	
holder postcode	LU1 3AJ
addr1	97-99 Castle Street
addr2	Luton
addr3	Bedfordshire
addr4	
postcode	LU1 3AJ
empty from	
rateable value	17500
vo propdescrip	SHOP AND PREMISES
liable from	04/06/2000
disc relief	No
mand relief	No
small relief	No
epr nond debit	No
void nond debit	No
s44a nond debit	No
sbrr relief	No
net local disc	Yes

APPENDIX 2:

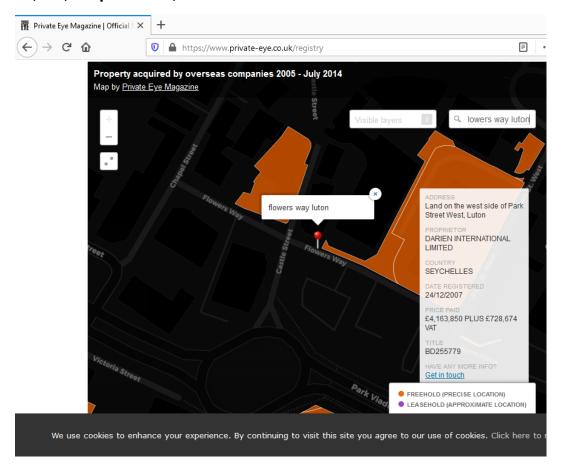
Erection of three	261 x 1-	Application No:	PART NOT IN ALLP. PART	29 January	8 🔼 Land
development	bed,	19/01597/MMAMD (Minor	IN ALLP.	2020	Opposite
blocks, with 349	58 x 2-	material amendment of			Whitbread House,
residential units.	bed/3	Planning Permission ref:	The application site is	GRANTED	Flowers Way,
	person	16/01649/FUL dated 26	within an allocated housing		Luton (542Kb)
APPLICANT:	26 x 2-	September 2017).	site (Land opposite		№8. Update to
London Luton	bed/ 4		Whitbread House, Flowers		Report - Land
Residential	person	Land Opposite Whitbread	Way) in the Luton Local		Opposite
Limited	4 x 3-	House, Flowers Way, Luton	Plan 2011-2031		Whitbread House,
	bed				Flowers Way,
SEE APPENDIX 2		Ward: South	Was only partly included		Luton (269Kb)
			in SHLAA; which		

included just 318 – so 31
have been added in the
"Not in Plan" column of the
"xls. Speadshreet".

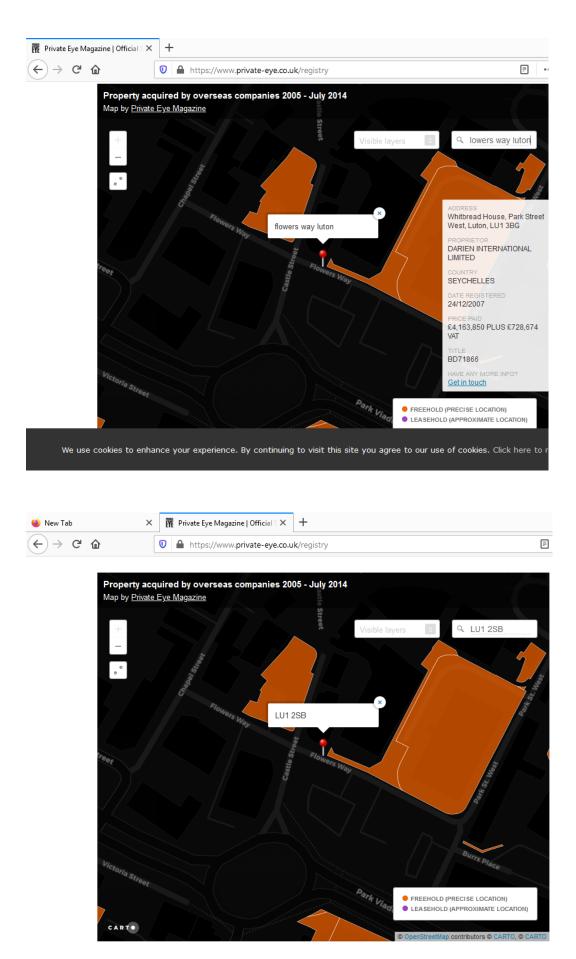
This site for three development blocks contains 349 residential units and is given an allocation within the Luton Local Plan.

Offshore records show there to be two separate entries for two separate parts of the land at Flowers Way, Luton. They have two separate prices. Together the value paid totalled £8,327,700 with VAT £1,457,348 – so just under 10 million pounds.

DARIEN INTERNATIONAL LIMITED, SEYCHELLES, BD 255779, 24 December 2007, £4,163,850 plus £728,674 VAT:



THE SECOND ENTRY IS DARIEN INTERNATIONAL LIMITED, SEYCHELLES, BD71866, 24 December 2007, £4,163,850 plus £728,674 VAT:



Within the Luton Borough Council's Commercial Properties Register – for properties with a Rateable Value Over 10k-(including-reliefs).v12Feb2020, a primary account holder name and address is given as "Mki Halls Ltd, 181 Barton Road, Luton" who is the account holder for Plaza Leisure Centre at Flowers Way; this entry may or may not be of relevance to the offshore registration. Details of the entry below anyway.

MATTERS-29,21,22-ADDEND	UM-EvidenceAppendix-			
Commercial-properties-with-a-rateable-value-over-				
10k-(including-reliefs)-v.12Feb2020				
propref	201014810015001			
account holder1	Mki Halls Ltd			
account holder2	T/A Venue Central			
holder addr1	181 Barton Road			
holder addr2	Luton			
holder addr3	Beds			
holder addr4				
holder postcode	LU3 2BN			
addr1	Plaza Leisure Centre			
addr2	Flowers Way			
addr3	Luton			
addr4				
postcode	LU1 2SB			
empty from				
rateable value	97500			
vo propdescrip	BANQUETING HALL AND PREMISES			
liable from	26/04/2010			
disc relief	No			
mand relief	No			
small relief	No			
epr nond debit	-			
void nond debit	No No			
s44a nond debit				
	No			
sbrr relief	No			
net local disc	Yes			

APPENDIX 3:

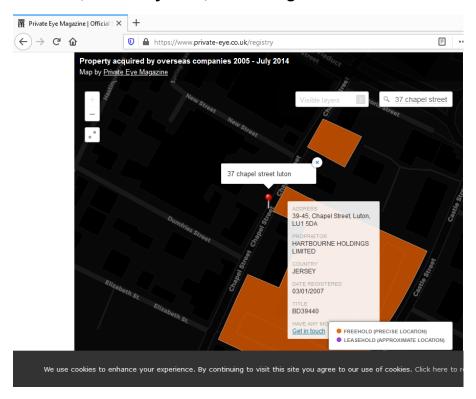
storey building, 43 bed flats. APPLICANT: Mr Westcott –The Property Shop	9/00889/FUL alloca Chap	cated housing site (27 –37 apel Street) in the Luton al Plan 2011-2031	20 February 2020 VISITED & GRANTED	11. NOS. 27-37 CHAPEL STREET, LUTON (567Kb) SITES TO BE VISITED 26TH FEBRUARY 2019 (312Kb)
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This site is for four and six storey buildings containing 43 flats. The site was given an allocation within the Luton Local Plan.

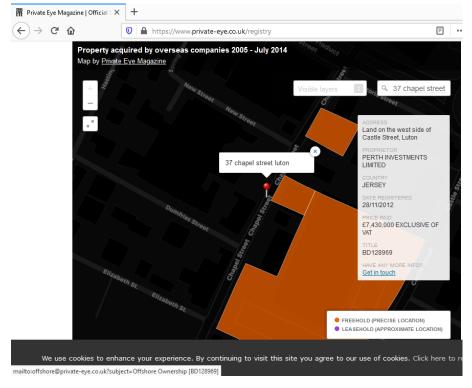
Offshore records however show a complication in that number 37 Chapel Street is the address entered - but that land also exists as citation for two much larger offshore registered plots.

There are three separate offshore entries for three separate parts of the land at Chapel Street, Luton with separate prices. Together the value paid totalled for two of them was £7,582,500 excluding the VAT. One's price however, 39-45 Chapel Street under HARTBOURNE HOLDINGS LTD is not specified, but this one attaches to the much larger pieces of land next to it.

39-45 Chapel Street, Luton, LU1 5DA, HARTBOURNE HOLDINGS LIMITED, JERSEY, BD39440, 3 January 2007, Price not given.

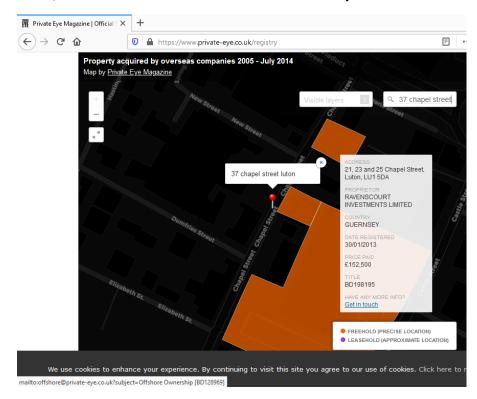


Land on the west side of Castle Street, Luton, but which is really also on Chapel Street, is just next-door. This is additional land and a second entry just behind this first one – "Land on the west side of Castle Street, Luton" (but which is really also on Chapel Street, Luton, LU1 5DA), PERTH INVESTMENTS LIMITED, JERSEY, BD128969, 28 November 2012, £7,430,000 Excluding VAT.

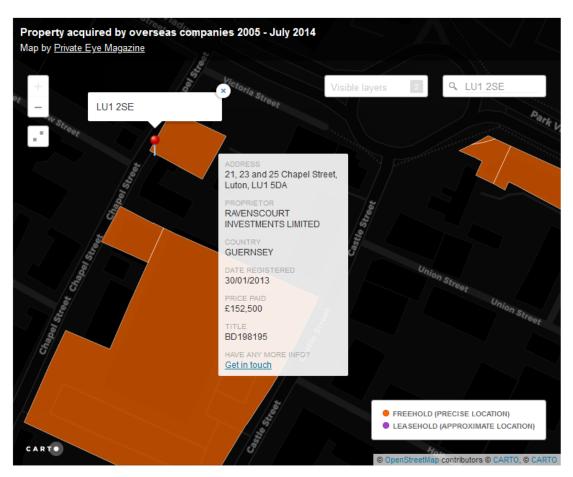


21, 23 and 25 Chapel Street, Luton, LU1 5DA, RAVENSCOURT INVESTMENTS LIMITED, GUERNSEY, BD198195, 30 January 2013, £152,500 excluding VAT.

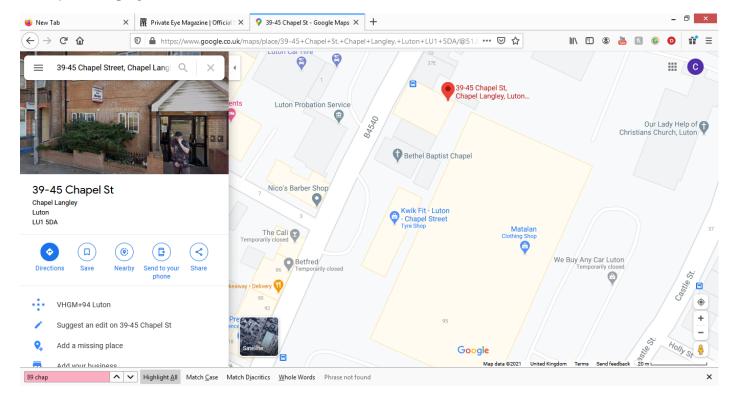
However there is land and a third entry just along from these other two. The price of £152,500 seems far too low for three entire plots in the town centre.



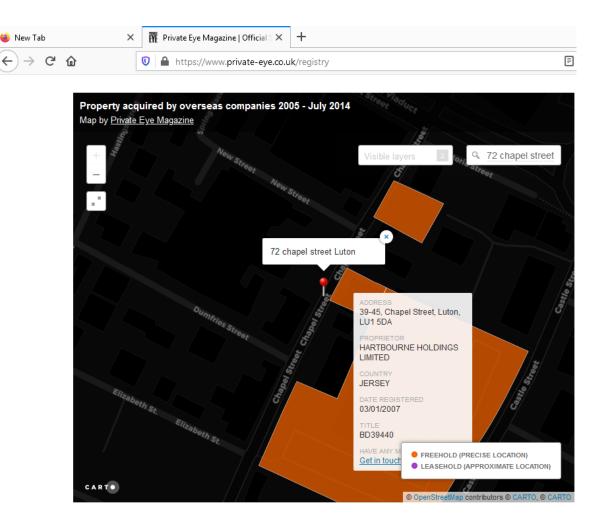




The irregularity is that the third entry has a post code that doesn't match the address. The wrongly registered postcode on the offshore record is "LU1 2SE". But as you can see on the entry above the postcode is "LU1 5DA". The Google Maps below; give 39-45 Chapel Street as <u>LU1 5DA</u>. 39-45 Chapel Street is an existing address, is occupied and is called "Chapel Langley".



But 39-45 Chapel Street, Luton, LU1 5DA, has an offshore record with HARTBOURNE HOLDINGS LIMITED, JERSEY, BD39440, 3 January 2007, Price not given.



Within the Luton Borough Council's Commercial Properties Register – for properties with a Rateable Value Over 10k-(including-reliefs).v12Feb2020, a primary account holder name and address is given as "Private Individual" of 22 London Road, Bedfordshire; this Council record started in 2010, which is three years after the offshore registration in 2007, so it is "of note" and may or may not be of relevance to the offshore registrations. Details of the entry below anyway.

MATTERS-29,21,22-ADDENDUM-EvidenceAppendix- Commercial-properties-with-a-rateable-value-over-			
10k-(including-reliefs)-v.12Fe	eb2020		
Propref	201014810039000		
account holder1	Private Individual		
account holder2	Private Individual		
holder addr1	22 London Road		
holder addr2	Luton		
holder addr3	Bedfordshire		
holder addr4			
holder postcode	LU1 3UQ		
addr1	39-45 Chapel Street		
addr2	Luton		
addr3	Bedfordshire		

addr4	
Postcode	LU1 5DA
empty from	
rateable value	12500
vo propdescrip	SHOP AND PREMISES
liable from	01/08/2010
disc relief	No
mand relief	
	No
small relief	
	No
epr nond debit	
	No
void nond debit	
	No
s44a nond debit	
	No
sbrr relief	Yes
net local disc	
	Yes

APPENDIX 4:

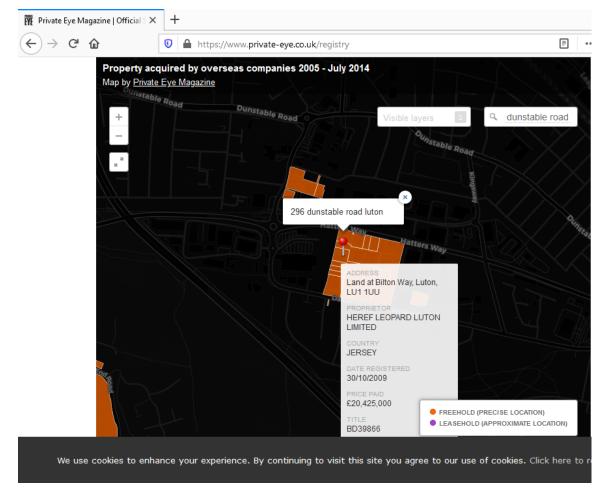
Change of use from hotel to 15 studio flats and erection of two storey rear	15 x studio	Application No: 19/01632/REMCON (Permitted Application No:	The site is unallocated on the Policies Map of the Luton Local Plan2011-2031.	GRANTED	12. NO. 296-298 DUNSTABLE ROAD, LUTON (380Kb)
APPLICANT: Kenexa Estate (Luton Ltd)		98/01208/FUL Dated 8 January 1999).			
SEE APPENDIX 4		No. 296-298 Dunstable Road, Luton			
		Ward: Biscot			

296 Dunstable Road is part of a very complex set of offshore registered sites.

IT TOO IS UNALLOCATED WITHIN THE LUTON LOCAL PLAN, EVEN THOUGH IT HAS BEEN GRANTED PERMISSION TO BE RESIDENTIALLY DEVELOPED.

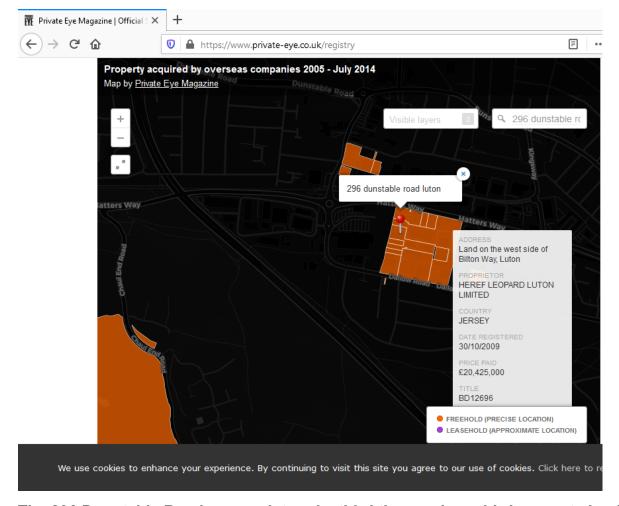
However the same site has had six separate land deed registrations, each of the value of £20,425,000 per title but each with a differently written name.

THAT IS A HUGE TOTAL AMOUNT OF £122,550,000!

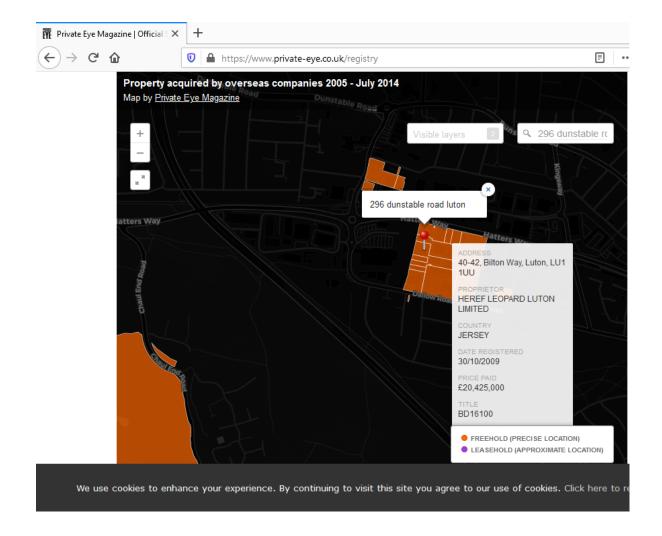


It was registered twice under two separate land deed titles as "Land at Bilton Way, Luton, LU1 1UU" with HEREF LEOPARD LUTON LIMITED, JERSEY, ON 30 October 2009.

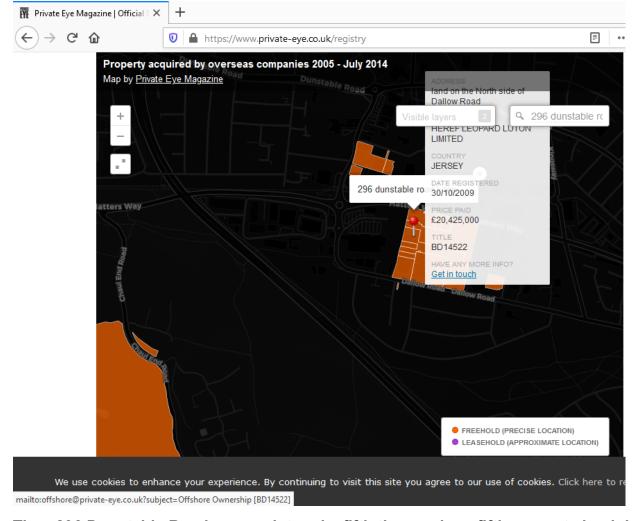
The cost was (AGAIN) £20,425,000 and the deed title was given as: BD39866 (above) and then (YET AGAIN) the same land, but with a slightly different name; "Land on the West Side of Bilton Way, Luton" was instead used to justify spending another £20,425,000 on title BD12696 (below).



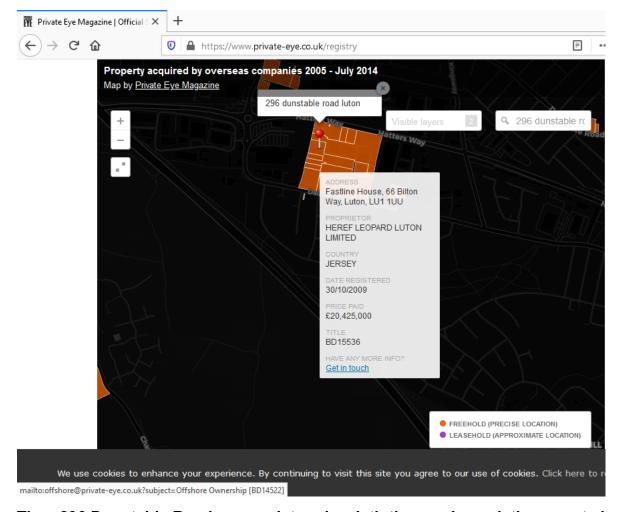
The 296 Dunstable Road was registered a third time under a third separate land deed title as "40-42, Bilton Way, Luton, LU1 1UU with HEREF LEOPARD LUTON LIMITED, JERSEY, 30 October 2009. The cost was AGAIN £20,425,000 title BD16100 (below).



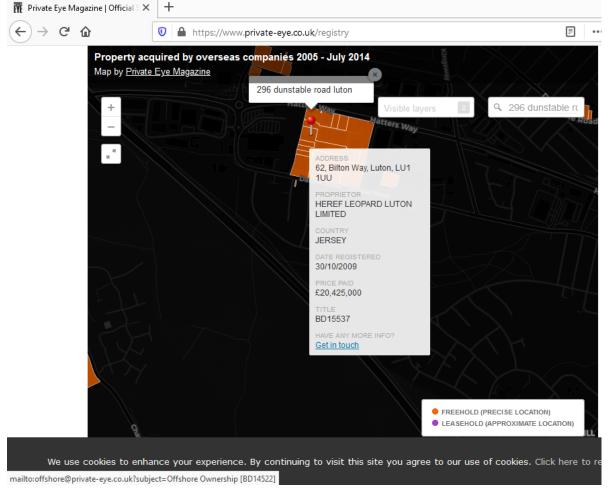
Then 296 Dunstable Road was registered a fourth time under a fourth separate land deed title called "Land on the North Side of Dallow Road, Luton" again with HEREF LEOPARD LUTON LIMITED, JERSEY, 30 October 2009. The cost was AGAIN £20,425,000 title BD14522 (below).



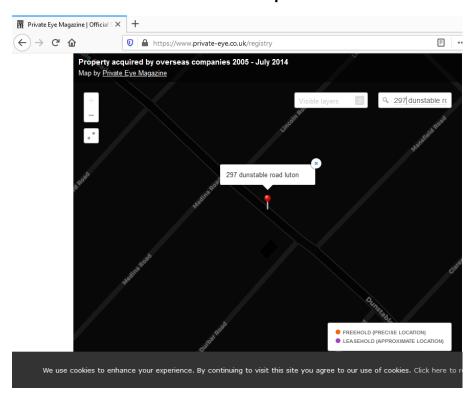
Then 296 Dunstable Road was registered a fifth time under a fifth separate land deed title as "Fastline House, 66 Bilton Way, Luton, LU1 1UU" with HEREF LEOPARD LUTON LIMITED, JERSEY, 30 October 2009. The cost was AGAIN £20,425,000 title BD15536 (below).

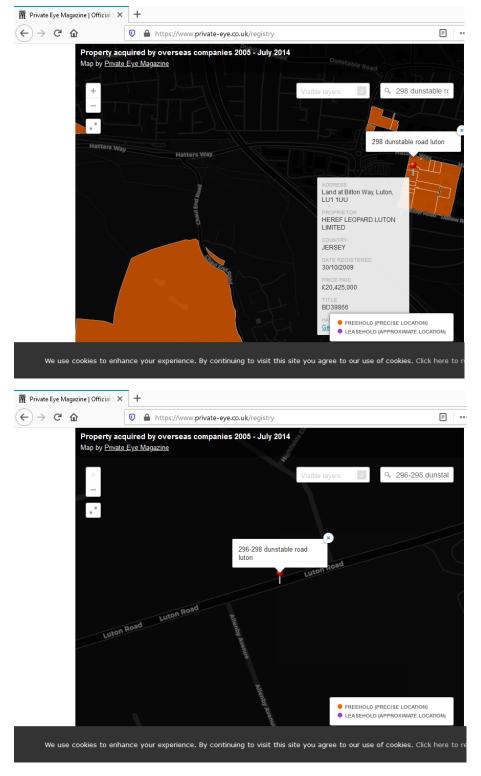


Then 296 Dunstable Road was registered a sixth time under a sixth separate land deed title as "62 Bilton Way, Luton, LU1 1UU with HEREF LEOPARD LUTON LIMITED, JERSEY, 30 October 2009. The cost was AGAIN £20,425,000 title BD15537 (below).



But the physical address of "297 Dunstable Road", instead of being across the road from the "296 Dunstable Road address"; as you would expect it to be since it is an odd number. This makes sense as in the UK most roads have even numbers on one side and odd numbers on the other. The original site address we were looking at, (the development granted permission), was "296-298 Dunstable Road, Luton" – which would mean only the two numbers "296 and 298" - as 297 Dunstable Road would be on the opposite side of the road. However I would not have expected 297 to be this far away from it:





This is possibly an anomaly – in the light of the HUGE amount of money REPEATEDLY PAID for the SAME land deeds - sold to the same offshore company. £122,550,000 is an abnormally large amount of money and is well in excess of the true land value – and many times over.

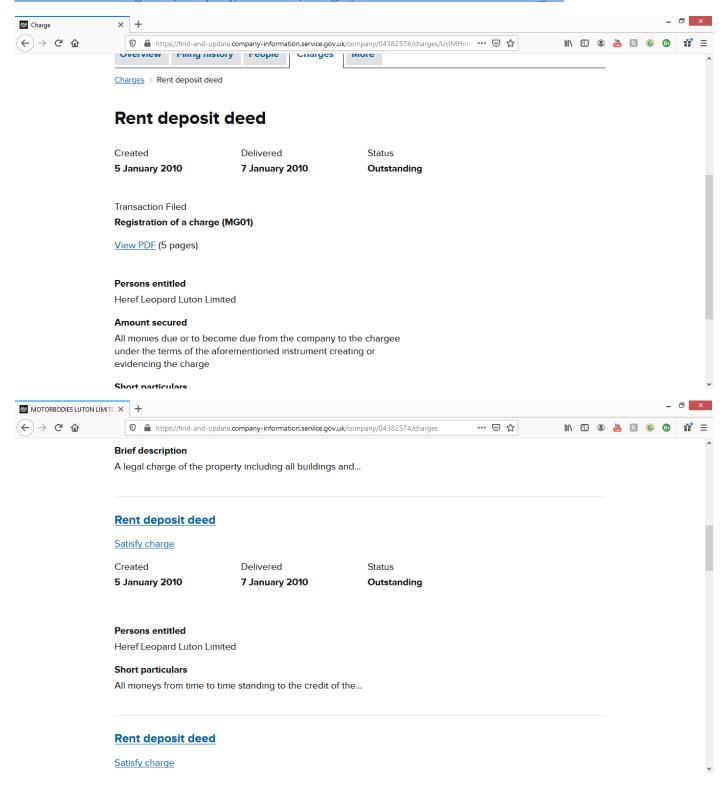
Here is some information on the company name that was registered as the proprietor: HEREF LEOPARD LUTON LIMITED. Publically available records are showing that they seem to also be the collector for some money to be paid by "MOTORBODIES LUTON LTD".

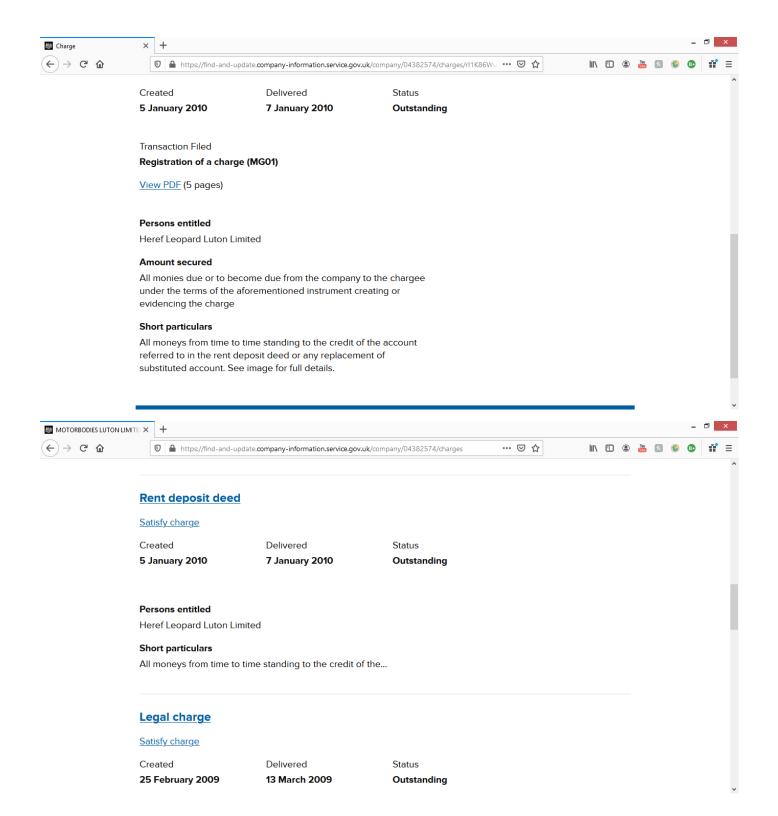
I make no claims about this particular company but there is a motor vehicles connection with other land-sites registered offshore and undeclared in the Adopted Luton Local Plan.

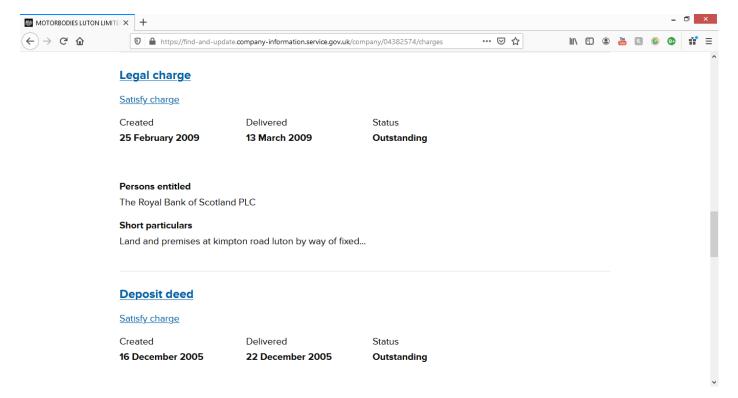
Source:

https://find-and-update.company-

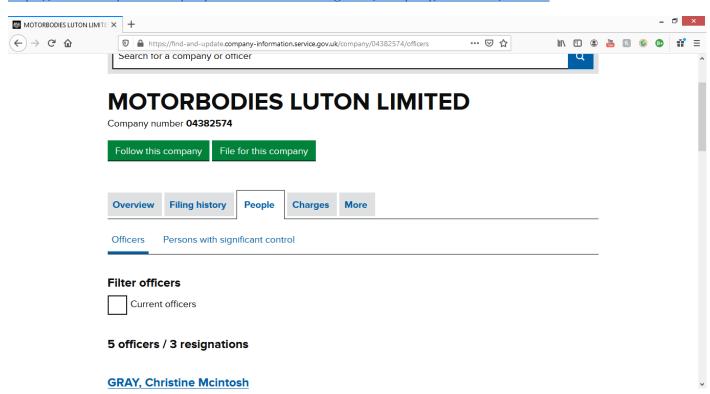
information.service.gov.uk/company/04382574/charges/UcIMHnmA4irJ1GeHAPA6W0k nLI

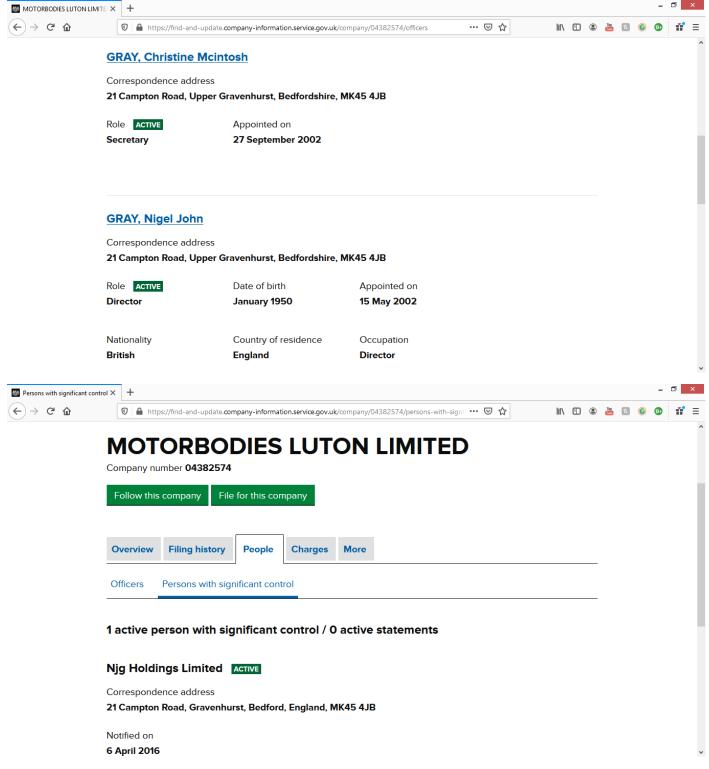




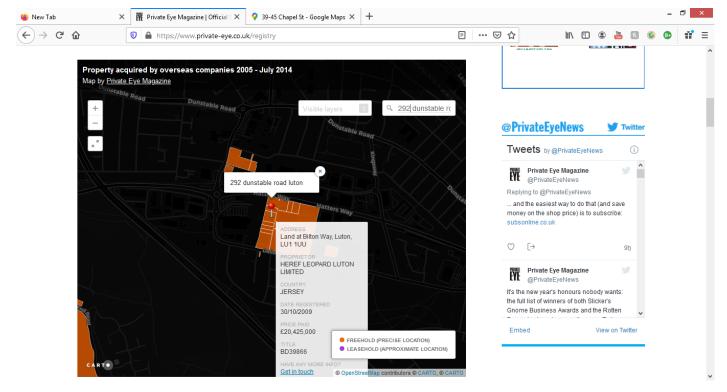


https://find-and-update.company-information.service.gov.uk/company/04382574/officers





ANOMOLY:

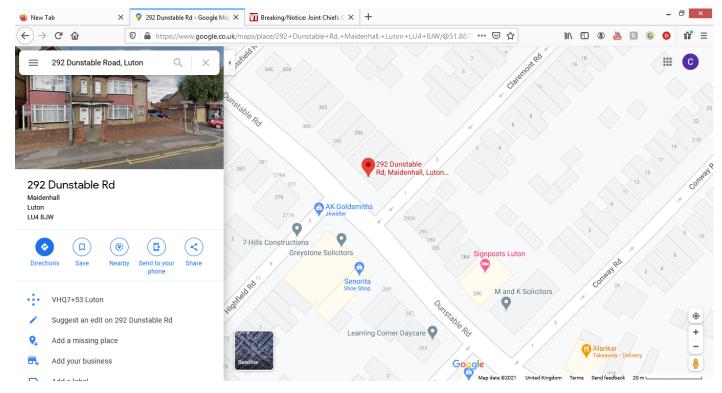


Here is the actual address "292 Dunstable Road, LU4 8JW" below at Googlemaps and it is not the same location as the land deed map has as its "292 Dunstable Road Luton" address. But they are connected it seems.

Source:

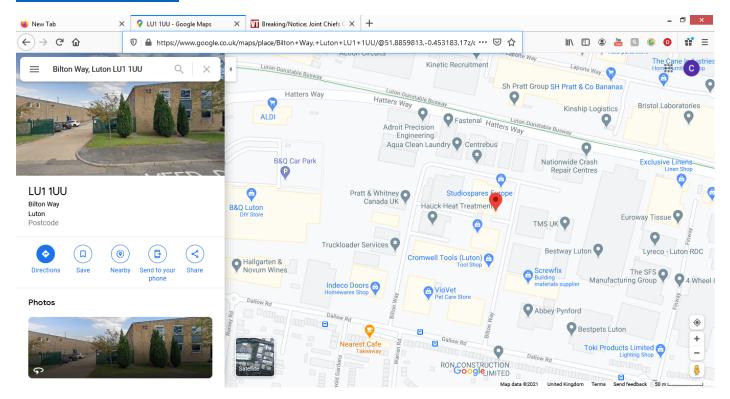
https://www.google.co.uk/maps/place/292+Dunstable+Rd,+Maidenhall,+Luton+LU4+8JW/@ 51.8878,-

0.4373026,19z/data=!4m5!3m4!1s0x487648fbf2db57d7:0x9c8b63f1e55e851d!8m2!3d51.8879 192!4d-0.4372811



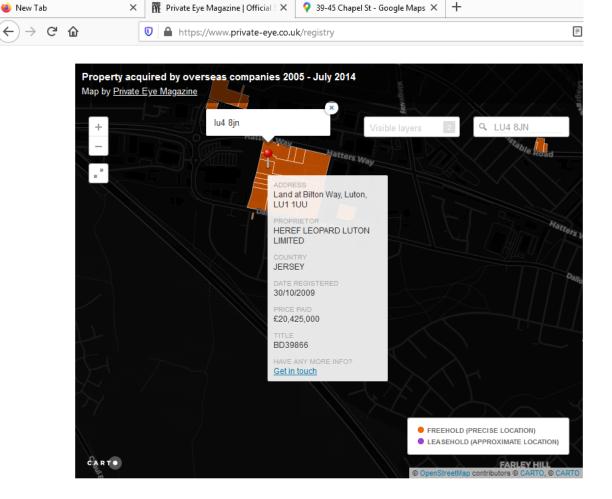
Here is "Bilton Way, Luton, LU1 1UU"

Source: https://www.google.co.uk/maps/place/Bilton+Way,+Luton+LU1+1UU/@51.8859813,-0.453183,17z/data=!3m1!4b1!4m5!3m4!1s0x487648e6ffffcc1f:0xc3e3b1afd7411f38!8m2!3d51. 886092!4d-0.4504428

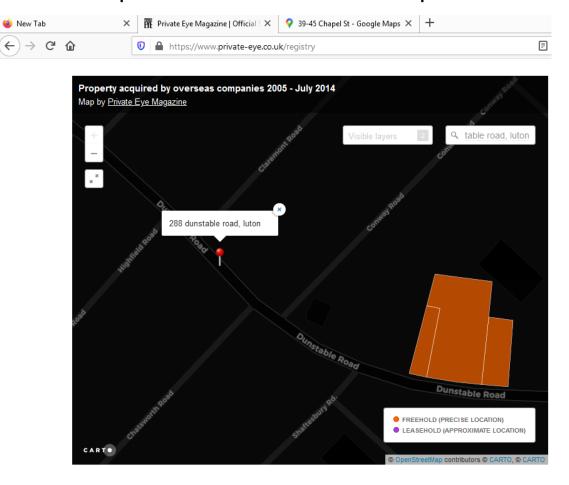


ANOMOLY:

Another problem is that the postal code LU4 8JN is also connected to this complicated clearly problematic multi-registered site. See Below.

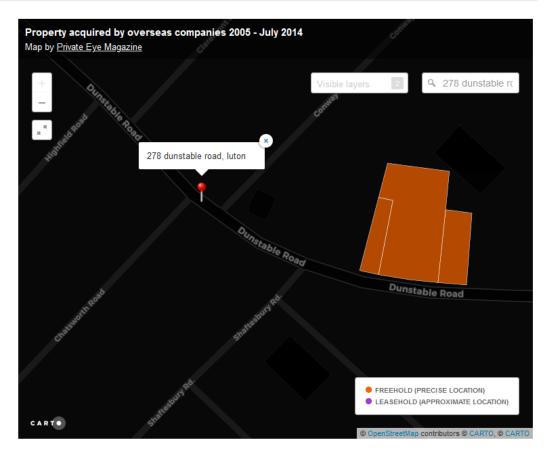


LU4 8JN (above) doesn't match the address in the "Luton Borough Council's Register for Commercial Properties with Rateable Value over 10K" spreadsheet:



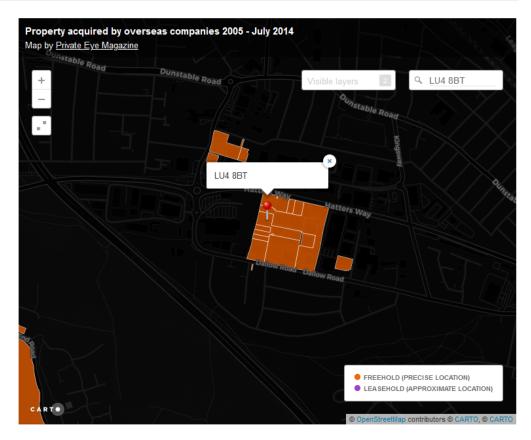
Or for the "278 Dunstable Road" address:





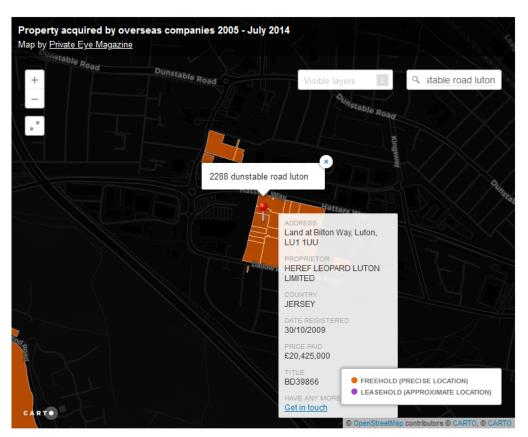
Also other postcodes from the over 10K rateable value spreadsheet are also frequently mismatched to this offshore mass of sites – "LU4 8BT":

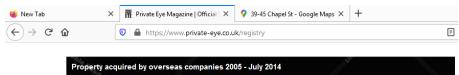


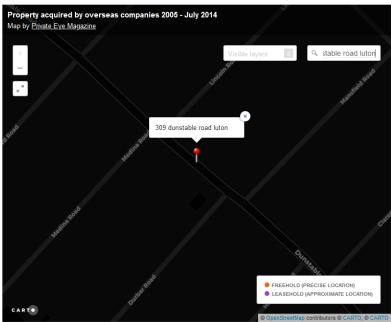


Also "2288 Dunstable Road, Luton" also matches:









In the last column in the chart below we see an entry for a "Private Individual" at "309 Dunstable Road, Luton". But "309 Dunstable Road" is not geographically at that postcode.

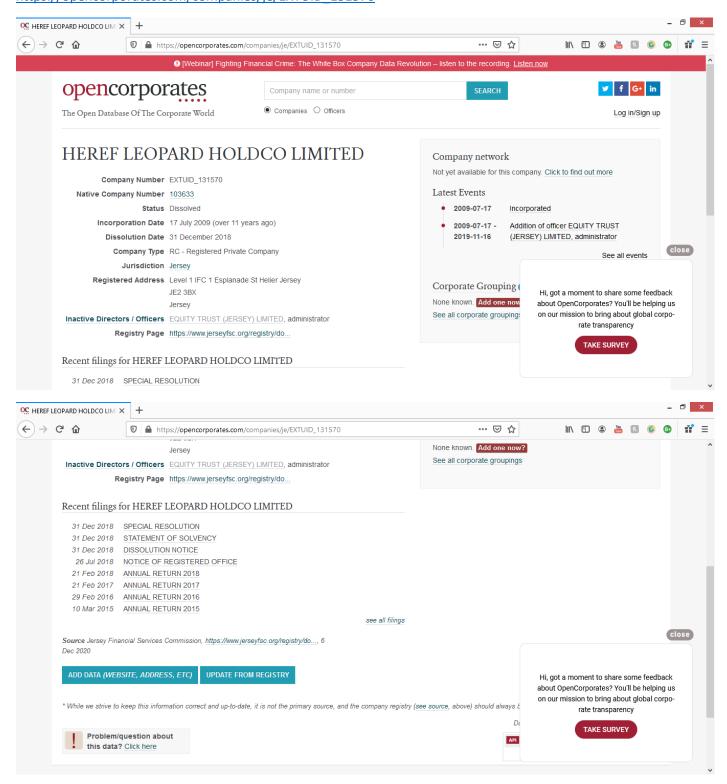
The wrong postcode is given as LU4 8BT. This postcode relates to the offshore registrations. These oddities share some connection with certain other account holders of "Private Individuals" * below and highlighted in red. They may or may not be relevant.

MATTERS-29,21,22-ADDEN	DUM-EvidenceAppendix-Com	mercial-properties-wi	th-a-rateable-value-o	ver-10k-(including-
reliefs)-v.12Feb2020				
Propref	201023010278000	201023010288010	201023010293009	201023010309002
account holder1	M&K Solicitors Ltd	Private Individual	Private Individual	Private Individual
account holder2		Private Individual	Private Individual	Private Individual
holder addr1	278 Dunstable Road		293 Dunstable Road	
holder addr2	Luton		Luton	
holder addr3	Bedfordshire			
holder addr4				
holder postcode	LU4 8JN		LU4 8BT	
addr1	278 Dunstable Road	288 Dunstable Road	293 Dunstable Road	309 Dunstable Road
addr2	Luton	Luton	Luton	Luton
addr3	Bedfordshire			Bedfordshire
addr4				
Postcode	LU4 8JN	LU4 8JN	LU4 8BT	LU4 8BT
empty from		14/07/2011		
rateable value	20250	10000	13500	17250
vo propdescrip	OFFICES AND PREMISES	SHOP AND PREMISES	SHOP AND PREMISES	SHOP AND PREMISES
liable from	24/03/2014	29/09/2017	01/04/1990	07/03/2016
disc relief	No	No	No	No

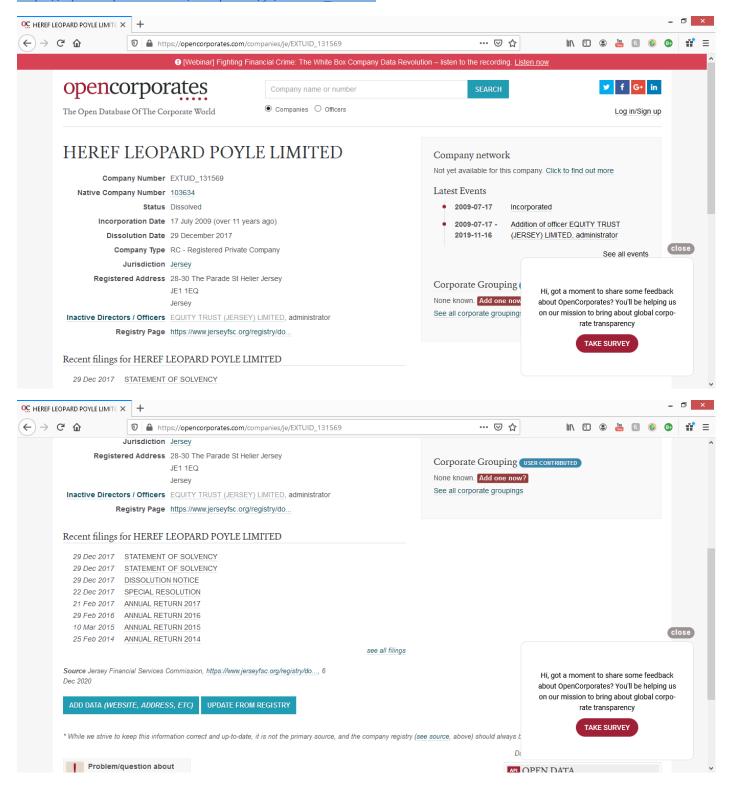
mand relief	No	No	No	No
small relief	No	No	No	No
epr nond debit	No	No	No	No
void nond debit	No	No	No	No
s44a nond debit	No	No	No	No
sbrr relief	No	Yes	Yes	No
net local disc	No	No	Yes	No

Further company data PROBABLY CONNECTED to the Proprietor "HEREF LEOPARD LUTON LIMITED". It may or may not be relevant.

https://opencorporates.com/companies/je/EXTUID 131570



https://opencorporates.com/companies/je/EXTUID 131569

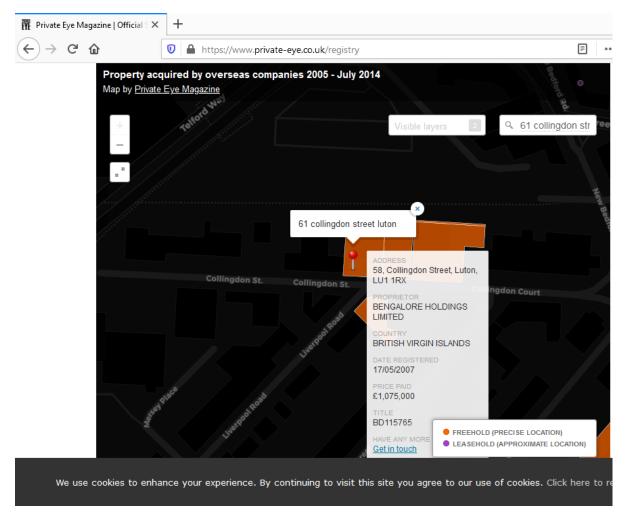


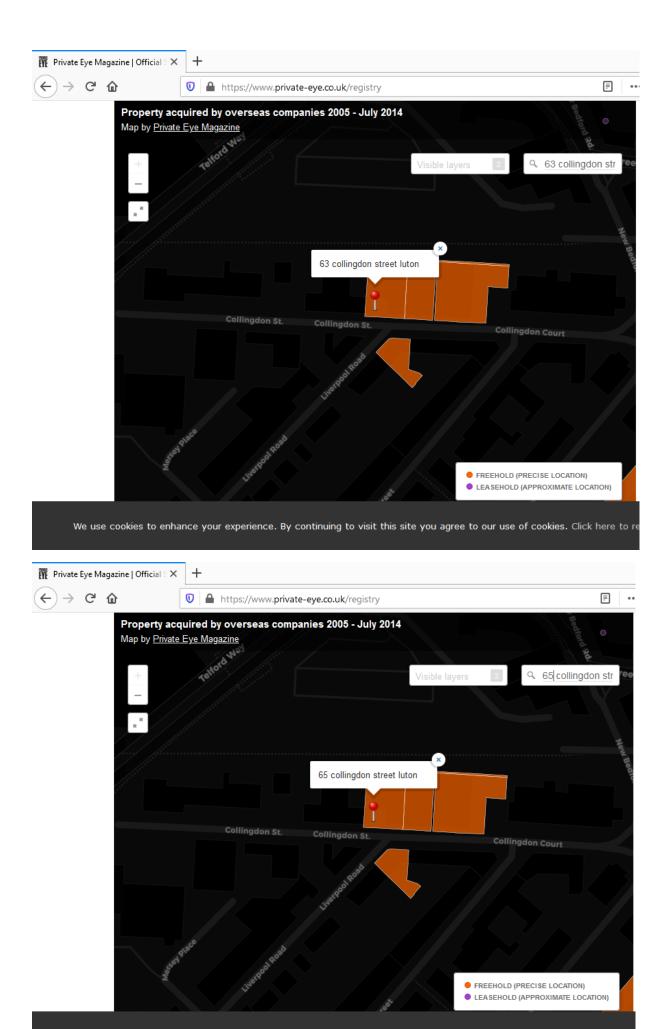
APPENDIX 5:

26 residential units	22 X	Application No:	Not in Adopted Local Plan as	25 March	11. NOS. 60-64
	2-	19/01159/FUL	a residential allocation.	2020	COLLINGDON STREET
APPLICANT:	bed,		Situated within the Town		(853Kb)
Mr Robert Dennis,	4 X 3-	60-64 Collingdon	Centre Area and Category 'B'	GRANTED	,
Acre Investment	bed	Street, Luton	Employment Area therein.		
Luton, Limited.		,	, , , , , , , , , , , , , , , , , , , ,		
		Ward: South			
SEE APPENDIX 5					

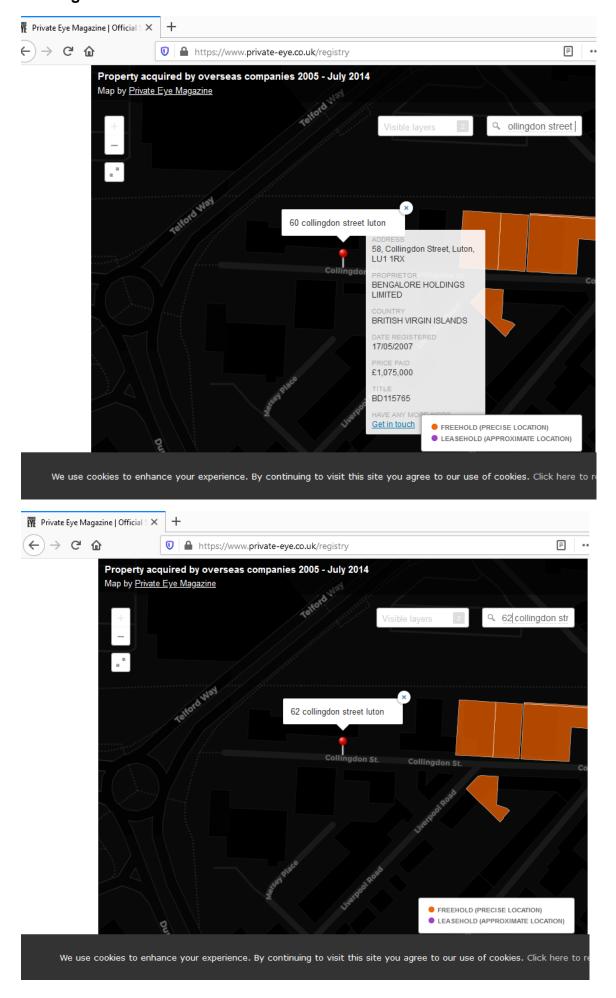
Next we have "60-64 Collingdon Street". It is another permitted residential development which is NOT in the Adopted Luton Local Plan but which is a multi-registered offshore land deed.

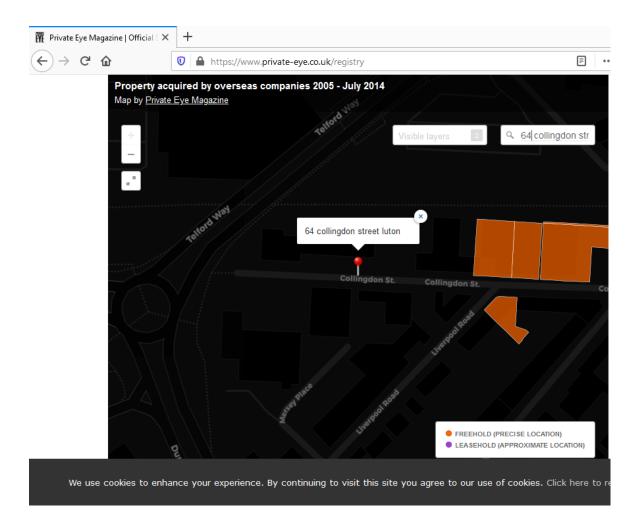
"61, 63 and 65 Collingdon Street, Luton" are geographically within a landsite which was registered under the address "58 Collingdon Street, Luton, LU1 1RX" to proprietor BENGALORE HOLDINGS LIMITED in the British Virgin Islands on 17 May 2007 for £1,075,000 under title BD115765.

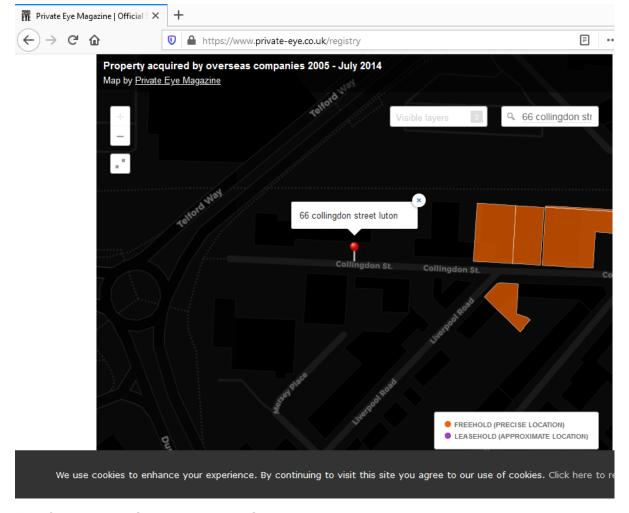




"60, 62 and 64 Collingdon Street, Luton" are not geographically within the landsite which was registered under the offshore address however.







"56 Collingdon Street, Luton" IS geographically within another landsite next-door (the one previously just mentioned which was registered under the address "58 Collingdon Street, Luton, LU1 1RX" to proprietor BENGALORE HOLDINGS LIMITED in the British Virgin Islands on 17 May 2007 for £1,075,000, under title BD115765).

This other one shares all of the same details except it is a separate site next-door and has a new separate offshore land title number: BD115766.

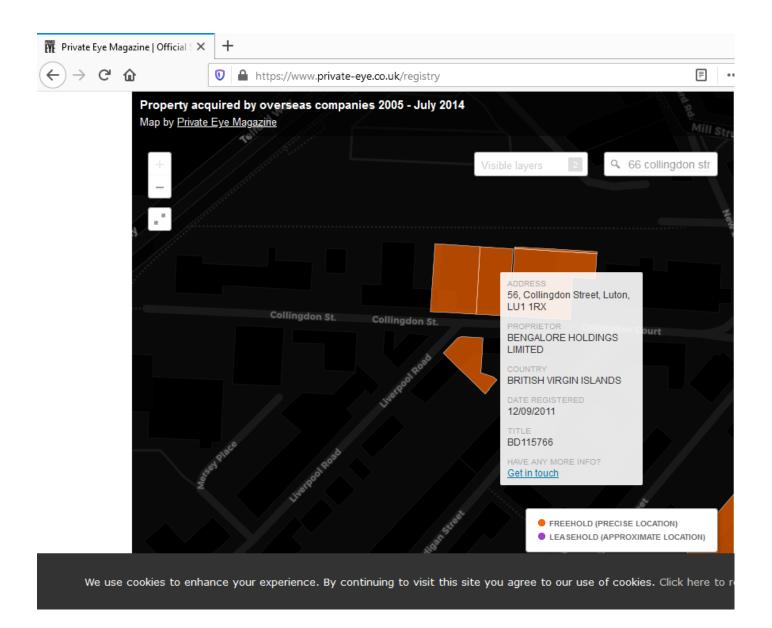
Considering both land titles are nearly the same and are consecutive reference numbers; they were registered purposefully at the same time but as separate entries. No value is provided for either however.

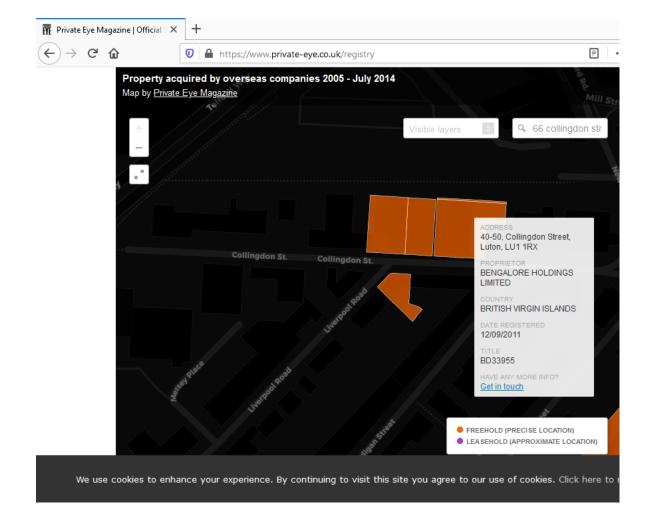
This also occurred three years before the Local Plan period started. Yet we presume the offshore registration continues, and this practise is still affecting many sites which have been permitted for residential development but yet which have NOT BEEN DISCLOSED in the Adopted Local Plan – rather they are being purposefully withheld.

I can't see how one cluster of properties in a backstreet of Luton Town, ever warrants a total of 122 million pounds to be paid via seven repeated payments.

The Green Belt is at stake here – so we simply cannot accept under any circumstances, property declaration evasion. The net result is that East of Luton and other places' Greenspace are being severely threatened and we are having to use our own private time and resources to defend them when we simply SHOULD NOT HAVE TO. This will therefore not be allowed to stand.

So it becomes necessary to know why this is occurring so frequently, as it has material consequences for the claimed Luton Unmet Need Figures and the real land supply.





These commercial properties appear on the Luton Council's rates above 10K register again – entries below.

AAATTERS 20 24 22 ASSESS	1.10.4			
MATTERS-29,21,22-ADDEND				
EvidenceAppendix-Commerc	Evidence Appendix-Commercial-properties-with-			
a-rateable-value-over-10k-(ii	a-rateable-value-over-10k-(including-reliefs)-			
v.12Feb2020				
propref	201017710060064			
account holder1	Staff Select Ltd			
account holder2	T/A Nova Training			
holder addr1	3 Lower Lichfield			
	Street			
holder addr2	Willenhall			
holder addr3	Midlands			
holder addr4				
holder postcode	WV13 1PX			
addr1	60-64 Collingdon			
	Street			
addr2	Luton			
addr3	Bedfordshire			
addr4				
postcode	LU1 1RX			
empty from				
rateable value	31750			

vo propdescrip	Workshop Offices and Premises		
liable from	25/07/2016		
disc relief	No		
mand relief	No		
small relief	No		
epr nond debit	No		
void nond debit	No		
s44a nond debit	No		
sbrr relief	No		
net local disc	No		

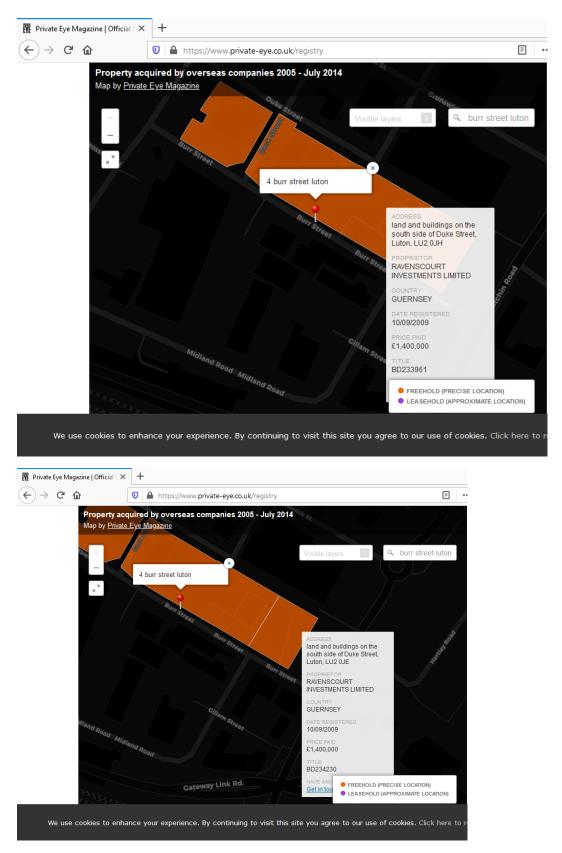
APPENDIX 6:

Erection of five x four to	68 x	Application No:	IS IN ALLP.	29 July 2020	11 MO. 4-11 BURR
six-storey buildings for	1-	20/00567/FUL	The site is allocated		STREET, LUTON
169 dwellings	bed,		within the High Town	RESUBMITTED	(1078Kb)
	24 x		Strategic Area on the	& GRANTED	(Report of the Head
FOLLOWING	3-	No. 4-11 Burr	Policies Map of the Luton		of Development
DEMOLITION OF	bed,	Street, Luton	Local Plan 2011-2031.		Management)
EXISTING BUILDINGS	1 x		Policy LLP15, as regards		Widilagement)
(RESUBMISSION).	4-	Ward: High	the development, relates		. 60
	bed,	Town	to the provision of		1. <u>1. 11.</u>
APPLICANT:			housing within the		Appendix 1
Burr Street Ltd			Borough.		(<u>1</u> 05Kb)
					2. <u>🛂 11.</u>
SEE APPENDIX 6			BUT this site was not		Appendix 2
			included in the 2019		(14Kb)
			SHLAA.		, ,

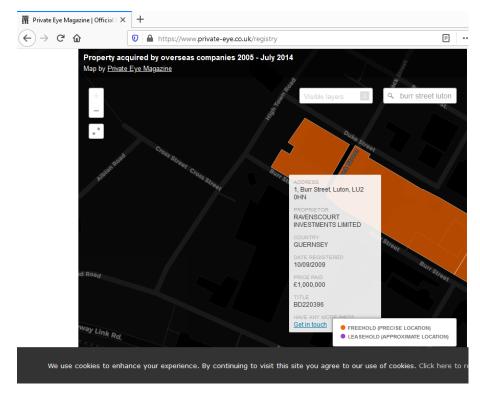
Next we have 4-11 Burr Street. It is another permitted residential development which is NOT in the Adopted Luton Local Plan but has a multi-registered offshore land deed correlating to it.

"4 Burr Street, Luton" is geographically within a landsite which was registered under the address "land and buildings on the south side of Duke Street, Luton, LU2 0JH"- Proprietor: RAVENSCOURT INVESTMENTS LIMITED in Guernsey. Price Paid: £1,400,000. Title: BD233961. And again – shortly afterwards; a second registration popped up called "land and buildings on the south side of Duke Street, Luton, LU2 0JE" which is just next-door - Proprietor: RAVENSCOURT INVESTMENTS LIMITED in Guernsey. Price Paid: £1,400,000. Title: BD234230.

So a total of £2,800,000 for those two plots – which is a large amount of money for such humble realty in a backstreet of Luton! But then it gets interesting because further individual addresses were also registered separately at an equally extortionate price!

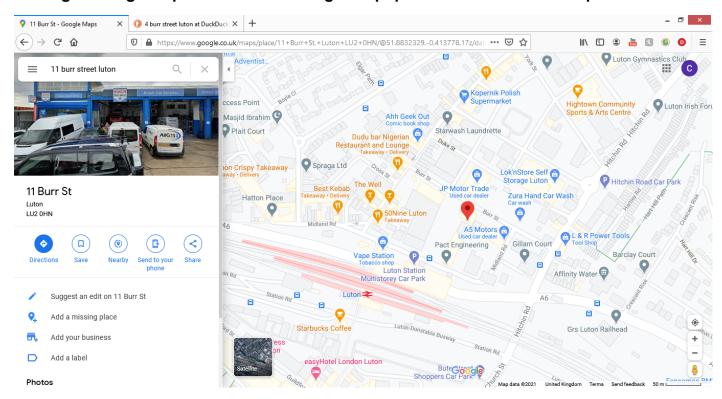


Below see "1 Burr Street, Luton, LU2 0HN" is geographically within the landsite area which was registered- Proprietor: RAVENSCOURT INVESTMENTS LIMITED in Guernsey, 10 September 2009. Price Paid: £1,000,000. Title: BD220396.

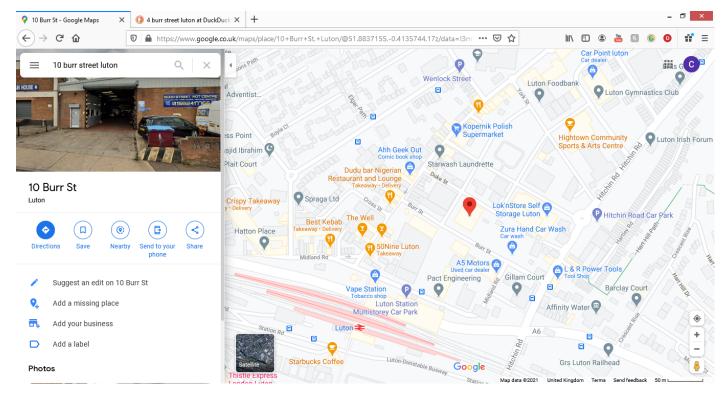


The address 4-11 Burr Street Luton is presented as one location on the Development and Control Meeting notes.

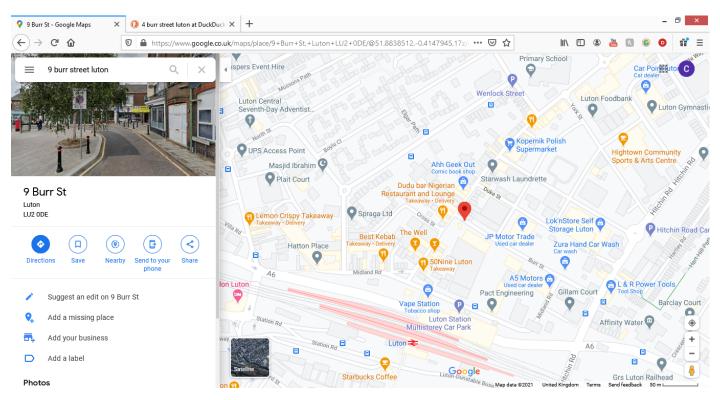
However "11 Burr Street" is at another location entirely on Googlemaps – whenever looking at Googlemaps we use the "orange lollipop" to see the location in question:



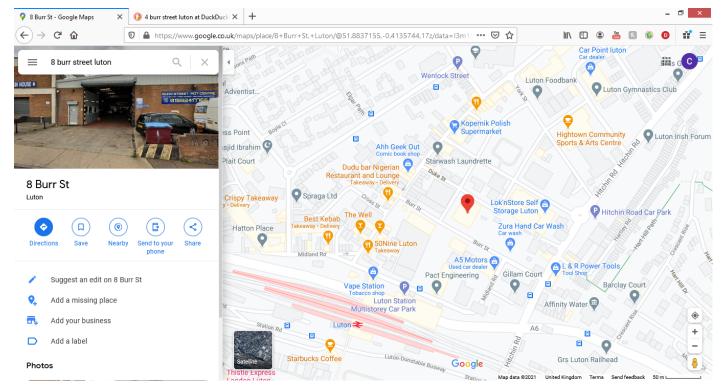
10 Burr Street is also another location:



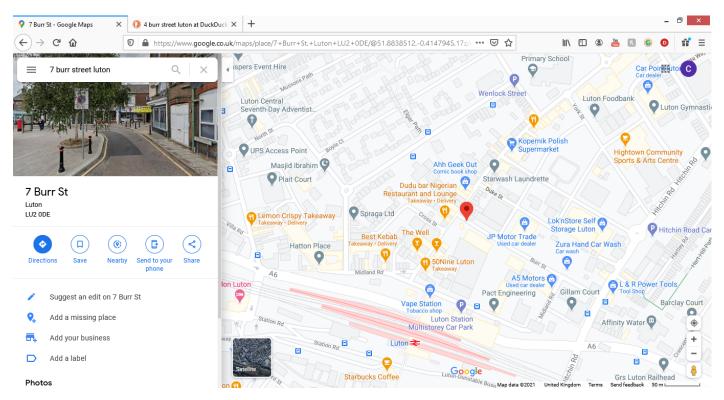
This is 9 Burr Street:



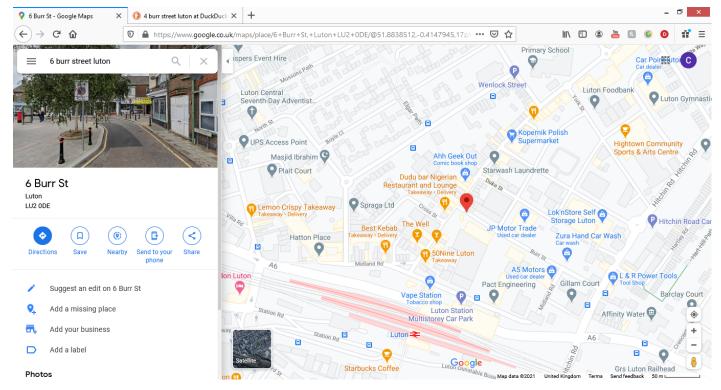
8 Burr Street is at the same location at 10 Burr Street:



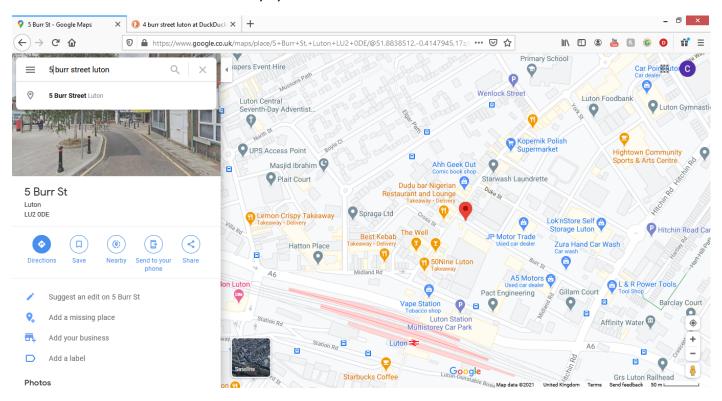
7 Burr Street is back in the same location as 9 Burr Street:

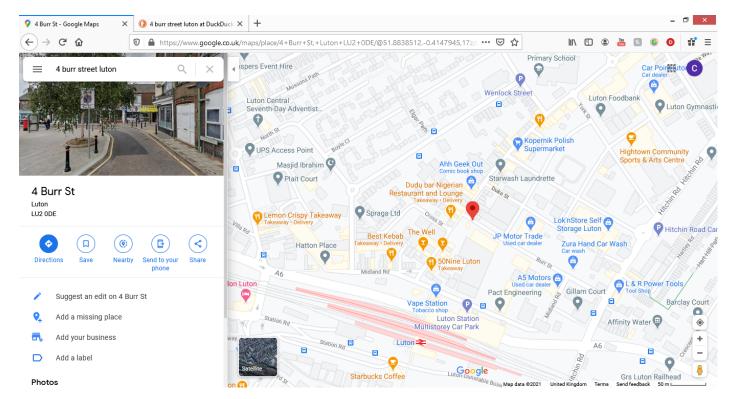


6 Burr Street is also with 7 and 9 Burr Street:



5 and 4 Burr Street is also with 6, 7, 9 Burr Street:

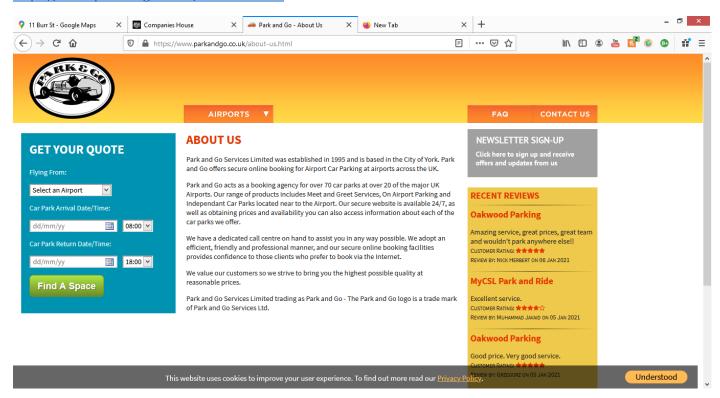




"11 Burr Street" is next to "Luton Airport Park and Go" car park, which is a parking scheme connected to an offshore company:

Source:

https://www.parkandgo.co.uk/about-us.html

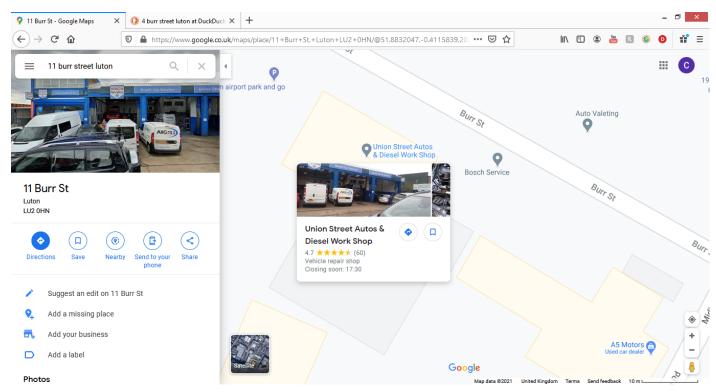


I do not know whether this "Park and Go" service is connected to the other Luton Airport Park First scheme. Unfortunately the Park First Scheme is being investigated by the Serious Fraud Office since about two years ago - due to the Director setting up various investment pension schemes which would go bankrupt and investors would repeatedly lose their money. The director had been placed under investigation, after he also set up the Park First investment scheme at London Luton Airport. See newspaper article below.

TobyWhittakerParkFirstBeingSued-EveningStandardArticle-16Oct2019

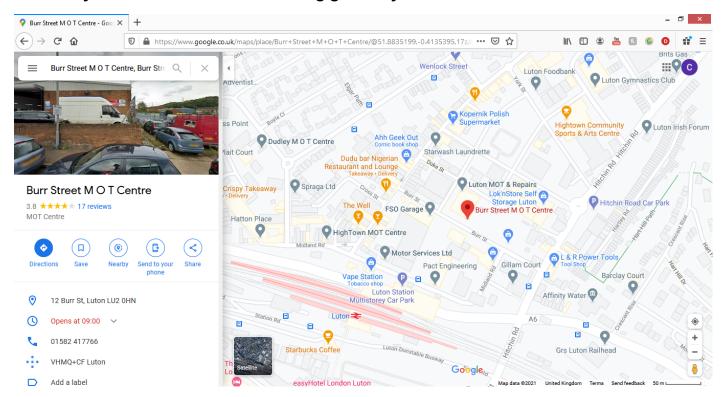


The building at 10 and 11 Burr Street is currently "Union Street Autos and Diesel Work Shop":



However the Burr Street account held by the Council is "Burr Street MOT Centre" and this is just across the road from the Address 10-11 Burr Street - which was registered as part of an offshore land holding, but which was separately located from the other half of the same offshore land register.

Just as an unfortunate side-note this "High Town area" is the Luton Town's infamous redlight and one of its many notorious crime districts. It's residents had to make complaints since they feared the area was becoming generally unsafe.



MATTERS-29,21,22-ADDENDUM- EvidenceAppendix-Commercial-properties- with-a-rateable-value-over-10k-(including- reliefs)-v.12Feb2020				
Propref	201011210001077			
account holder1	Burr Street Mot Center Ltd			
account holder2				
holder addr1	Mot Centre			
holder addr2	Burr Street			
holder addr3	Luton			
holder addr4	Beds			
holder postcode	LU2 0HN			
addr1	Mot Centre At			
addr2	12 Burr Street			
addr3	Luton			

addr4	Bedfordshire		
Postcode	LU2 0HN		
empty from			
rateable value	12000		
vo propdescrip	Workshop and Premises		
liable from	01/10/2014		
disc relief	No		
mand relief	No		
small relief	No		
epr nond debit	No		
void nond debit	No		
s44a nond debit	No		
sbrr relief	Yes		
net local disc	No		