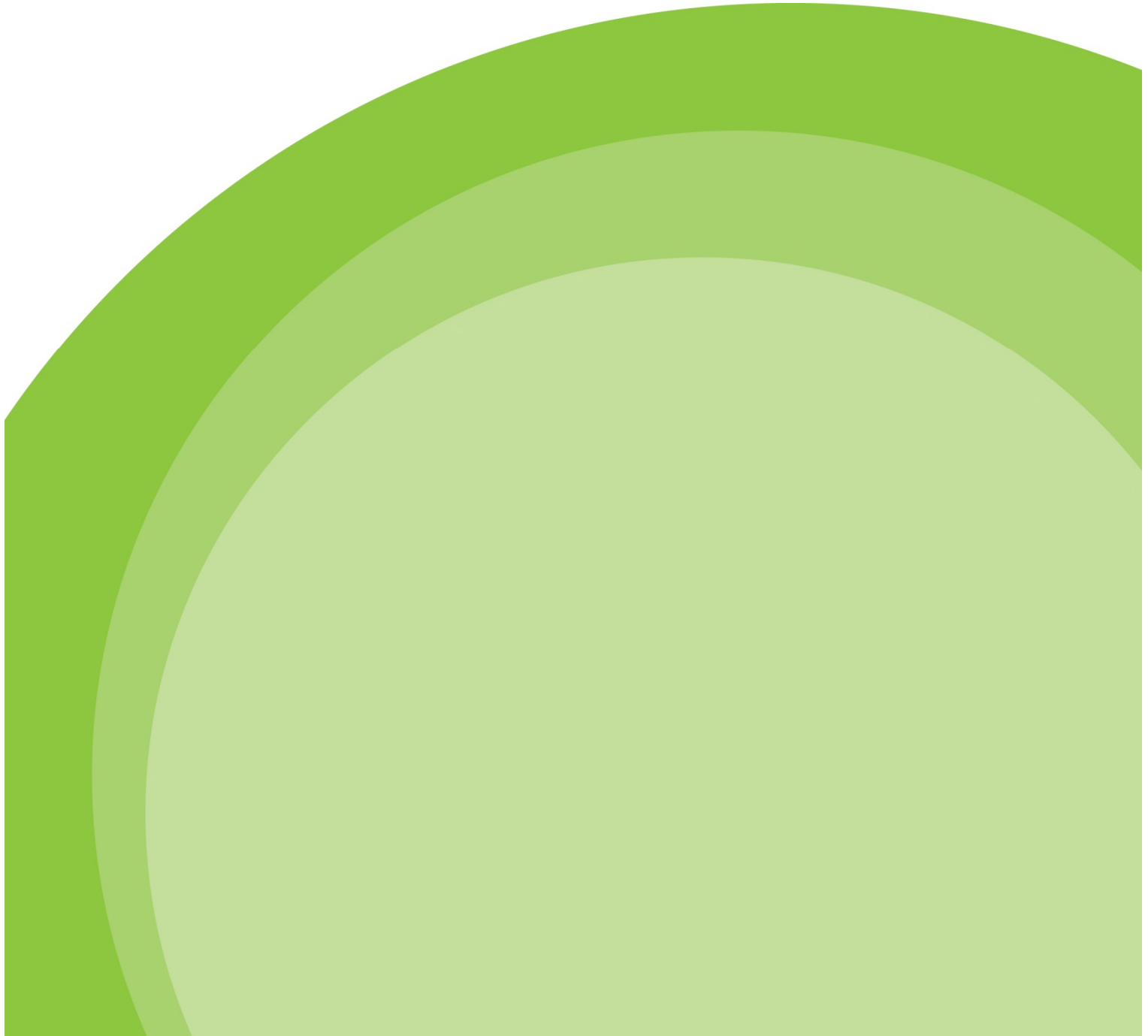




Urban Capacity Report

July 2017



Central Bedfordshire Urban Capacity Report

1. Introduction

- 1.1 The Urban Capacity Report sets out the different strands of policy and practice that, as a combined approach, demonstrate the Council are seeking every opportunity across Central Bedfordshire to maximise the use of available land within settlements, before looking to greenfield sites within the countryside in order to accommodate future growth requirements. This will ensure the Local Plan meets the requirements of the NPPF and the emerging direction of future policy as set out in the Housing White Paper.

2. Key Findings

- 2.1 The Urban Capacity Report discusses the following strands of policy and practice:

Luton, Dunstable and Houghton Regis Urban Capacity Potential Study (2016)

- 2.2 Luton, Dunstable and Houghton Regis have a significant role to play in contributing towards growth within the Luton Housing Market Area (HMA). The Council commissioned Nexus Planning to prepare an Urban Capacity Study to identify the potential for achieving additional capacity from developments within the Luton, Dunstable and Houghton Regis conurbation. The Study conducted a two stage assessment:

- Stage One – A baseline assessment confirming the sites identified in the SHLAAs and ELRs for Central Bedfordshire and Luton Borough were still suitable for residential development. No new sites were considered.
- Stage Two – Testing the sites against alternative densities to see whether they could be increased to deliver additional homes.

- 2.3 The study concluded there may be an opportunity to increase development capacity by 148-496 dwellings within Central Bedfordshire, achieved through increasing density.

Established planning policies

- 2.4 Established planning policies relating to Settlement Envelopes and Green Belt have been successful in focusing windfall development within settlements, thus protecting the countryside and Green Belt from inappropriate development. Windfall developments have therefore made a significant contribution towards committed and completed growth within Central Bedfordshire. These policies will be taken forwards into the new Central Bedfordshire Local Plan, to ensure that any viable opportunities for additional residential development within settlements will continue to be realised outside of the plan making process. Evidence from the Windfall Topic Paper demonstrates that windfall will continue to contribute towards the housing target throughout the plan period.

Call for sites submissions

- 2.5 848 sites were submitted to the Council through two 'Call for Sites' exercises in 2014 and 2016. Of these sites only 24 (or 3%) were located wholly within settlements. This demonstrates that the Settlement Envelope and Green Belt policies are highly successful in focusing windfall

opportunities within settlements, reducing the need for submissions to be considered through the local plan process.

Brownfield register

- 2.6 The Council are required to prepare a formal brownfield register by 31 December 2017. The intention is to increase the supply of new housing whilst reducing the need to use greenfield land. Once formally published the brownfield register will be reviewed annually. Sites on Part 2 of the register will automatically receive Permission in Principle, meaning planning permission will be granted subject to a detailed consent process.
- 2.7 As a pilot authority, the Council compiled a pilot brownfield register. 33 sites were identified in line with the draft assessment criteria, 16 of which did not have a current planning permission. The pilot register will be reassessed when further statutory guidance is published in summer 2017 to ensure it meets the formal requirements of the regulations.

Employment Land Review

- 2.8 The Council commissioned Peter Brett Associates (PBA) to conduct a FEMA Study and Employment Land Review (ELR). The ELR assessed whether the portfolio of existing, committed and potential employment sites within Central Bedfordshire remain fit for purpose and should be retained in accordance with the NPPF. The assessment was based solely on employment related issues and concluded 12 sites that have planning permission (but have yet to be developed or completed) should be critically reviewed by the Council. The Council will identify any employment sites suitable for release and will assess their suitability for residential use through the housing site assessment process. Other uses may also be considered in order to achieve sustainable development.
- 2.9 The new Local Plan will take a flexible approach to employment provision, with policies to allow a change of use to non-B employment generating uses and to non-employment uses subject to meeting specific policy criteria.

Enabling delivery projects

- 2.10 The Council is taking a proactive approach to strengthening market towns and has a programme in place to secure sustainable growth and stimulate regeneration. There are a number of delivery plans in place, in the form of Strategic Delivery Frameworks and Town Centre Masterplans; and new Place Plans being developed focusing on projects and sites the Council has control over, and assist in delivering place-making priorities for each area.

3. Summary of Implications

Absence of a Central Bedfordshire wide Urban Capacity Study

- 3.1 The Urban Capacity Potential Study only considered Luton, Dunstable and Houghton Regis due to the significant contribution they currently and will continue to make towards meeting the housing needs of Central Bedfordshire and Luton within the Luton HMA. The Council may be criticised for not conducting a full assessment of capacity for all settlements in Central Bedfordshire. However, the benefit of conducting such a study has to be weighed up against the

cost of its preparation. The Council are confident the overarching Urban Capacity Report demonstrates that successful policies are, and will continue to be, in place to encourage available and viable opportunities within settlements to come forwards outside of the plan making process. This is further supported by the brownfield register and the Council's proactive approach in identifying, enabling and delivering opportunities within settlements through Delivery Frameworks, Place Plans and Masterplanning.

Approach to development densities

- 3.2 Whilst increasing development densities within settlements and along transport corridors is supported by the Council, careful consideration needs to be given to the character of the surrounding area and any constraints and opportunities that may be present in accordance with the Central Bedfordshire Design Guide. The recent Housing White Paper (2017) placed great emphasis on making the best and most efficient use of land by utilising available previously developed land and building at increased densities, in order to protect the countryside and Green Belt. Therefore the current approach, as set out in the Design Guide and draft Development Management policies, may not fully meet the future requirements of the NPPF and both may need to be revised.

Future revision to the Urban Capacity Report

- 3.3 The Urban Capacity Report may need to be revised to take account of any changes to national planning policy and practice, as well as changes to emerging local plan policies and the evidence base.

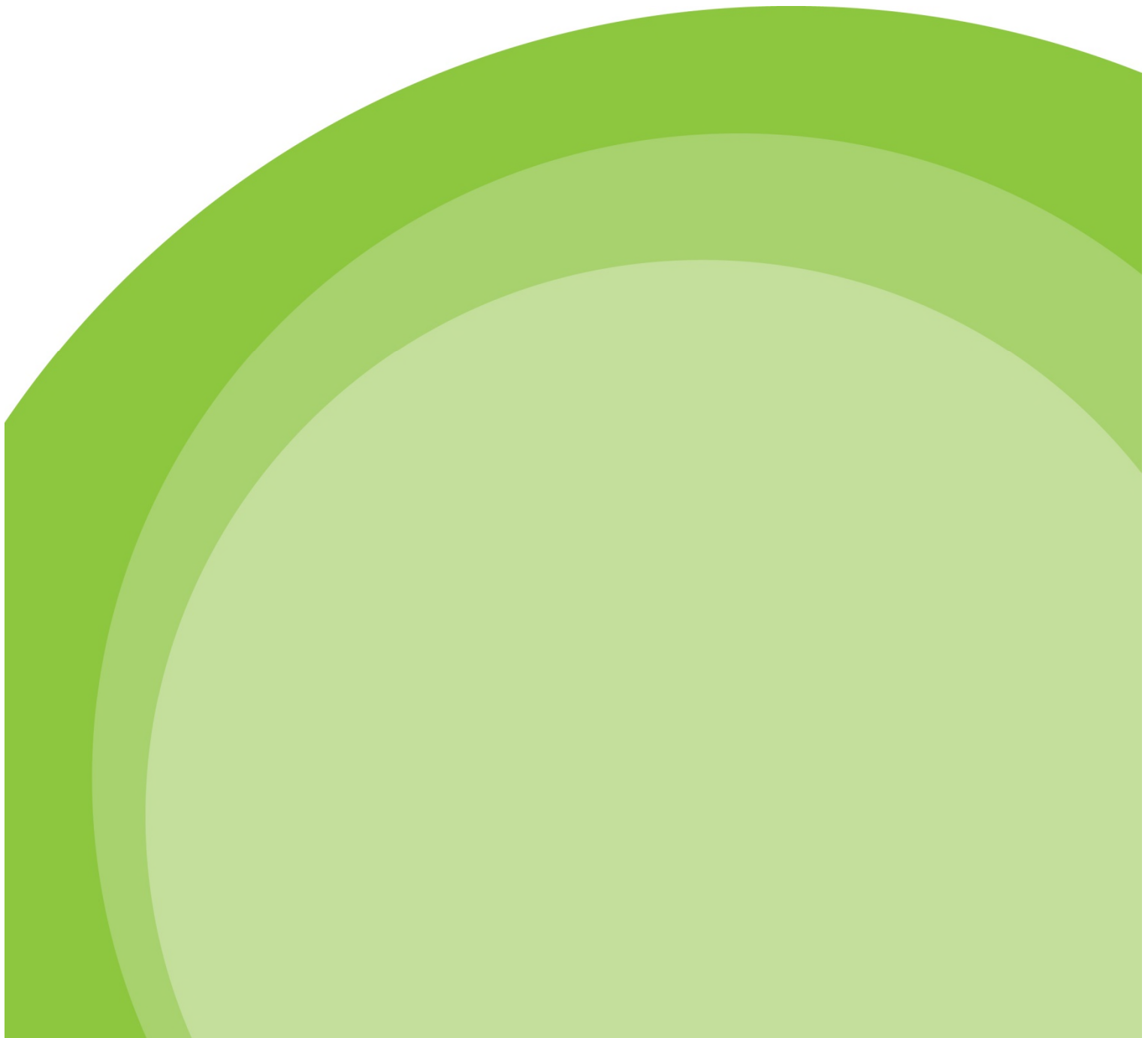
Appendix A

Central Bedfordshire Urban Capacity Report



Urban Capacity Report

May 2017



Urban Capacity Report

1. Introduction

- 1.1 The National Planning Policy Framework (NPPF) (March 2012) and Housing White Paper: Fixing our Broken Housing Market (February 2017) place great emphasis on making the best and most efficient use of land, by utilising available previously developed land (or 'brownfield' land) and building at appropriate densities.
- 1.2 This Urban Capacity Report sets out the different strands of policy and practice that, as a combined approach, demonstrate the Council are seeking every opportunity across Central Bedfordshire to maximise the use of available land within settlements. This will ensure the Local Plan meets the requirements of the NPPF and the emerging direction of future policy as set out in the Housing White Paper.

2. National Planning Policy Background

- 2.1 Paragraph 111 of the NPPF states that, *"Planning policies and decisions should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value"*. The Housing White Paper emphasised the Government's intention to maximise the use of previously developed land. Paragraph 1.24 states that *"We must make as much use as possible of previously developed ('brownfield') land for homes – so that this resource is put to productive use, to support the regeneration of our cities, towns and villages, to support economic growth and to limit the pressure on the countryside"*. Paragraph 1.25 further states that, *"The presumption should be that brownfield land is suitable for housing unless there are clear and specific reasons for the contrary"*. Consequently the White Paper sets out the intention to amend the NPPF to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for new homes.
- 2.2 With regards to housing density, paragraph 1.53 of the Housing White Paper states the Government's intention to amend the NPPF to make it clear that plans and development proposals should:
 - *"make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing requirements;*
 - *address the particular scope for higher-density housing in urban locations..."*

- 2.3 In preparing the Local Plan, the Council will seek opportunities to increase housing densities in appropriate locations and maximise opportunities to utilise vacant and previously developed land within settlements, prior to looking to edge of settlement or countryside locations in allocating or approving sites for development.

3. Luton, Dunstable and Houghton Regis Urban Capacity Potential Study

- 3.1 Luton's Strategic Housing Land Availability Assessment (SHLAA) (2016) identified that Luton's housing needs cannot be accommodated within the Borough boundary, and suitable sites will need to be found elsewhere within the Luton Housing Market Area (HMA), and possibly beyond, in order to meet this shortfall.
- 3.2 The urban areas of Luton, Dunstable and Houghton Regis are highly significant in terms of the contribution they currently and will continue to make towards meeting the housing needs of Central Bedfordshire and Luton within the Luton HMA. The Council therefore commissioned Nexus Planning to prepare the Luton, Dunstable and Houghton Regis Urban Capacity Potential Study (2016). The purpose of the study was to assess the full housing delivery potential of the Luton, Dunstable and Houghton Regis Conurbation. A copy of the study is included within Appendix 1 of this report.
- 3.3 The study took a two stage approach:
- Stage 1: Baseline Urban Capacity Potential – assessing and confirming the baseline residential capacity of sites already identified within the Luton, Dunstable and Houghton Regis area (as identified within the SHLAA's and Employment Land Reviews prepared by Central Bedfordshire Council and Luton Borough Council). No new sites were considered;
 - Stage 2: Density Scenario Testing – alternative density scenario testing of the Stage 1 baseline position to see whether site densities could be increased to deliver additional homes.
- 3.4 Following the two stage assessment of sites, the study concluded the potential for an additional 2,192 and 3,527 dwellings within the study area of Luton, Dunstable and Houghton Regis, of which between 148 and 496 are within Central Bedfordshire.
- 3.5 The study demonstrates that within Central Bedfordshire there are opportunities for increasing the potential capacity of development within Dunstable and Houghton Regis although they are significantly more limited in scope when compared to the opportunities identified within Luton.

Increasing density

- 3.6 Central Bedfordshire is a diverse area characterised by distinctive landscapes, important heritage and wildlife assets, and a variety of settlements of specific character. It is therefore important that new developments are designed to respect this diversity and enhance the unique characteristics of the area.
- 3.7 Whilst the Council supports the principle of making the best and most efficient use of land available, careful consideration needs to be given to the density of new housing proposals with regards to their relationship to the surrounding area. Each proposal must be considered on a case by case basis and designed to take into account the character of surrounding areas and the opportunities and constraints present in its location. The adopted [Central Bedfordshire Design Guide](#) (2014) sets out the Council's current approach to the density of new developments, providing examples of where particular densities may be appropriate.
- 3.8 The Council will generally support higher densities within urban locations such as Dunstable and Houghton Regis, particularly along existing and potential new public transport corridors. Changes in density across a larger scheme or in urban settings can often be appropriate and add variety to the streetscape and vitality to an area. For sites towards the edge of settlements and those within smaller towns and villages, the Council would expect densities to reflect the existing character of the surrounding area.
- 3.9 In light of the conclusions of the Luton, Dunstable and Houghton Regis Urban Capacity Potential Study, and reflecting on the current approach to density within policy and guidance, the Council will seek to increase the capacity of growth within settlements where appropriate. Any increase in density within settlements will however need to fully consider the surrounding context of the area.

4. Established policies: Settlement Envelopes, Green Belt Infill Boundaries and Green Belt Inset Boundaries

- 4.1 Central Bedfordshire is a predominantly rural area with market towns and villages and the larger settlements of Dunstable and Houghton Regis forming part of a wider urban conurbation with Luton. The southern part of Central Bedfordshire is designated as Green Belt, with the towns and villages in this area either 'inset' or 'washed over'.
- 4.2 The Council has a number of established planning policies within adopted Local Plans that have sought to focus new development within existing settlements, and protect the Green Belt and wider countryside from inappropriate development.
- 4.3 Settlements that fall within the extent of the Green Belt are either 'washed over', or 'inset' and excluded from the Green Belt. Some of the

settlements washed over by Green Belt do however have designated infill only boundaries. Beyond the Green Belt, the 2009 north Core Strategy and Development Management Policies Development Plan Document (DPD) designates Settlement Envelopes around towns, large villages and small villages that allow new community facilities, employment uses and residential development to come forward within the defined Settlement Envelope, that is commensurate with the scale of the settlement and reflects the local character of the area in line with the Design Guide.

- 4.4 Settlement Envelopes are a well established policy tool in Central Bedfordshire. The Local Plan First Review (December 2005) formally developed Settlement Envelopes as a framework for controlling development, and defined their boundaries. The success of this policy approach, alongside public support, led to the approach being retained in the current [Core Strategy and Development Management Policies Development Plan Document \(DPD\)](#) (2009).
- 4.5 The Council will seek to maintain the extent of the Green Belt as far as possible, subject to any identified need for new allocations as identified and tested through the new Local Plan. Settlements that fall within the Green Belt will remain as either 'inset' or 'washed over'. Beyond the Green Belt, the Settlement Envelope policy has been highly successful in focusing new development within settlements and protecting the countryside from inappropriate windfall development, and will be taken forwards into the new Local Plan. This will ensure any viable opportunities for additional residential development within settlements will continue to be realised outside of the plan making process.
- 4.6 The presence of the Settlement Envelope and Green Belt policies within the adopted Local Plans have ensured that opportunities for windfall developments have been taken forwards and this has made a significant contribution towards committed and completed growth within Central Bedfordshire. Evidence set out in the [Windfall Topic Paper](#) (January 2017) demonstrates that windfall will continue to contribute towards the housing target throughout the time period of the new Local Plan, and allowance should be made for this contribution.

5. New Central Bedfordshire Local Plan 2035 - Call for Sites

- 5.1 As part of the preparation of the new Local Plan the Council conducted two 'Call for Sites' exercises in 2014 and 2016. A total of 848 sites were received for consideration, representing a significant level of response. Each site is currently undergoing a rigorous assessment in line with the housing or employment site assessment criteria in order to identify potential sites for allocation within the new Local Plan. The strategy for growth, including selected site allocations, will be set out in the Regulation 19 plan in 2018.

- 5.2 Of the 848 sites received, only 24 fell wholly within existing settlements. This equates to only 3% of sites submitted and 97% of sites submitted therefore fall beyond settlements, on land designated as part of the wider countryside. This further demonstrates that the Green Belt and Settlement Envelope policies have been highly successful in focusing development opportunities within settlements thereby increasing their capacity.

6. Brownfield Register

- 6.1 The Council was selected as one of 73 Local Authorities to develop a pilot brownfield register, due to previous experience and a good track record of developing brownfield sites.
- 6.2 The purpose of the register is to produce a standard set of information on brownfield sites that will be kept up to date and made publicly available on the Council's website. This will help provide certainty for developers and communities on which sites could be developed, and will encourage investment in local areas. The Government has also set a UK wide target to ensure that 90% of suitable brownfield sites have planning permission for housing by 2020. The register will help to promote previously developed land and prioritise it for the redevelopment of housing, where appropriate, thus increasing the supply of new housing and reducing the need for greenfield land. This means less countryside will need to be identified for housing development through the new Local Plan.
- 6.3 The proposals came into force in mid April 2017 and the Council will be expected to have compiled its formal register by 31 December 2017. Regard will need to be had to the development plan, national policy and advice and guidance when exercising functions under the brownfield register regulations.
- 6.4 In developing the pilot register, the Council identified 33 sites in line with the assessment criteria, 16 of which did not have a current planning permission (as at January 2017). By May 2017 development had commenced on 9 of these sites and the total number of sites on the pilot register was consequently reduced to 24. A copy of the pilot register (as at May 2017) is included within Appendix 2 of this report. Further statutory guidance is due to be published by the Government in summer 2017 and the Council will review the draft pilot register at this time in order to ensure it has met the formal requirements. This will also present the opportunity for any additional sites to be considered in line with the published criteria.
- 6.5 Once formally published, the Council will update the brownfield register annually, with opportunities for brownfield sites to be submitted to the Council for consideration as part of the annual review. Those that are designated on Part 2 of the brownfield register as being suitable for

housing will benefit from 'Permission in Principle' which means that planning permission will be granted for this use, subject to a detailed consent process. If a site is assessed as not being suitable for the brownfield register the site promoter has the opportunity of submitting a planning application to establish whether residential development is suitable.

7. Employment Land Review

- 7.1 The Council appointed Peter Brett Associates (PBA) to undertake a FEMA Study and Employment Land Review (ELR) (2016). The ELR assesses whether the portfolio of employment sites within Central Bedfordshire remain fit for purpose and should therefore be retained for employment uses in accordance with paragraph 22 of the NPPF; or whether they could be released for alternative uses. The assessment considered all existing employment sites within Central Bedfordshire; development sites with planning permission that have not been started or completed; and allocations in the adopted Local Plans.
- 7.2 PBA's analysis only considered employment related issues and did not consider any broader planning merits. In assessing the permitted development sites, PBA identified 12 sites for review by the Council.
- 7.3 The Council will critically assess any employment sites considered suitable for release and judgements made on these sites will be balanced alongside the overall requirement to allocate and safeguard sufficient land to meet future job growth and respond to market demands. Not all sites may be considered suitable for residential uses and other uses may also be considered in order to achieve sustainable development. For those sites where residential uses may be appropriate, their suitability will be assessed through the housing site assessment process alongside the 848 sites submitted through the Call for Sites.
- 7.4 Overall Central Bedfordshire has a broad employment offer. In order to maintain and expand this diversity, support existing business growth and to attract inward investment of both large and small businesses, the Council has adopted a flexible approach to employment provision. Through the portfolio of employment sites, the Council will seek to ensure a mix of tenure, type and size of premises to support business and jobs growth, including the provision of freehold sites offered to occupiers addressing the findings of the ELR. Underperforming small and medium sized sites will therefore be retained to allow for opportunities and churn.
- 7.5 In order to remain flexible, the new Local Plan will include policies to allow a change of use from B employment uses to non-B employment uses on allocated and key employment land where the detailed policy criteria are met and the proposal will not impact on the delivery or quantity of land for B uses. In instances where allocated or key

employment sites are no longer suitable for any employment generating uses, the Council will require detailed evidence to demonstrate that there is no suitable market interest and that the site is no longer viable. This mechanism will allow for non suitable employment sites to come forwards for additional residential development on a windfall basis.

8. Enabling Delivery in Central Bedfordshire's Market Towns

8.1 The Council is taking a proactive approach to strengthening the market towns within Central Bedfordshire and has a programme in place to secure sustainable growth and stimulate regeneration opportunities.

8.2 As part of this process a number of delivery plans have been and are being prepared to assist in implementing growth within Central Bedfordshire. The focus is not predominantly on delivering residential development only, but also employment, retail and community facilities in order to ensure towns and villages remain sustainable and attractive places for residents to live and work.

Market Towns Strategic Delivery Frameworks

8.3 The Council has produced a series of Strategic Delivery Frameworks for five priority Market Towns: Biggleswade, Ampthill and Flitwick, Dunstable and Leighton Linlade. These Frameworks are intended to act as a development prospectus for investors and stakeholders. They were prepared using information on planning applications, land availability and adopted council masterplans/development briefs. A number of possible development opportunities were identified within each of the towns to consider for inclusion within the Framework.

8.4 The Delivery Frameworks take forward and promote the most viable opportunities for development within each town, and take a proactive approach in bringing forward their delivery. The strategic vision for each town was based on its place-making priorities

Place Plans

8.5 Moving forwards from the Strategic Delivery Frameworks, the Council is currently preparing a series of delivery plans for each of the towns within Central Bedfordshire and any new settlements that may be delivered through the local planning process. These Place Plans focus on projects and sites that the council has control over and will effectively assist in delivering the place-making priorities for each area.

Town Centre Masterplans

8.6 The Council has prepared a number of Town Centre Masterplans to assist in identifying, promoting and guiding new retail, leisure and housing led development opportunities within town centres, ensuring a coordinated approach to enacting positive change, suitable development and improvements.

- 8.7 These adopted Masterplans sit alongside adopted planning policies as Supplementary Planning Documents (SPDs) and provide additional detail on the distribution of uses identified and delivery mechanisms. Examples include the [Biggleswade Town Centre Strategy and Masterplan](#) (2011) and the [Dunstable Masterplan](#) (2011).

Project example: Land South of the High Street, Leighton Buzzard

- 8.8 The Council is also actively taking a role in bringing forward regeneration opportunities within settlements. Land South of the High Street, Leighton Buzzard offers a unique opportunity for a comprehensive, new, mixed-use (including residential) town centre development creating a sustainable extension to the primary shopping area.
- 8.9 Following the adoption of the 2012 Development Brief, the Council acquired three parcels of land to the south of Leighton Buzzard High Street. As the principal land owner the Council is seeking to steward development and secure investors through active site promotion to bring forward this development, and are currently putting together a development proposal. This proposal will set out the type of development that can go forwards, including detail on units and businesses, design, transport links, delivery mechanisms and timeframes.
- 8.10 Although a unique opportunity that may not be replicated in other settlements, it demonstrates the Council's commitment to bringing forward opportunities to maximise the potential of our settlements.

9. Conclusion

- 9.1 This Urban Capacity Report sets out the different strands of policy and practice that, as a combined approach, demonstrate the Council are seeking every opportunity across Central Bedfordshire to maximise the use of available land within settlements. This ensures the Local Plan meets the requirements of the NPPF and the emerging direction of future policy as set out in the Housing White Paper.
- 9.2 Established planning policies have been critical in successfully focusing windfall development within settlements, thus protecting the countryside and Green Belt from inappropriate development. Windfall developments have therefore made a significant contribution towards committed and completed growth within Central Bedfordshire. These policies will be taken forwards into the new Local Plan to ensure any viable opportunities for additional residential development within settlements will continue to be realised outside of the plan making process. Windfall development will therefore continue to contribute towards the housing target through the plan period.
- 9.3 The strength of current policies has however meant significant opportunities within settlements have already been realised. The

retention of these key policies, supported in the future by the brownfield register, flexible employment policies and the Council's proactive approach to enabling development is likely to mean any remaining urban capacity will not be of a sufficient scale to meet the level of outstanding housing need required in Central Bedfordshire. Greenfield sites will therefore need to be sought in order to deliver the quantum of growth required up to 2035.

**Appendix 1: Luton, Dunstable and Houghton Regis
Urban Capacity Potential Study (Nexus Planning,
2016)**

Luton, Dunstable and Houghton Regis Urban Capacity Potential Study

on behalf of Central Bedfordshire Council

Luton, Dunstable and Houghton Regis Urban Capacity Potential Study
on behalf of Central Bedfordshire Council

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Nexus
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Appendix 1: Study Area boundary plan

Appendix 2: Schedule of confirmed urban capacity potential

Appendix 3: Sites assessed as potentially deliverable

Appendix 4: Sequential density zone areas

Executive Summary

The urban areas of Luton, Dunstable and Houghton Regis (the Study Area) are considered to be extremely important in terms of the contribution they make, and will continue to make, towards meeting the housing needs of Luton as well as for Central Bedfordshire. The purpose of this urban capacity potential study is to therefore ensure that a full assessment is made of this area and its future housing delivery potential. The study comprises two principal elements:

Stage 1: Baseline Urban Capacity Potential: Assessing and confirming the baseline residential development urban potential capacity of sites within the Study Area; and

Stage 2: Density and Delivery Potential: Alternative density scenario testing of the Stage 1 baseline urban capacity potential position.

Stage One: Baseline Urban Capacity Potential

The respective Luton and Central Bedfordshire land assessments, which consider the suitability of land for development, within the Study Area have been prepared broadly in accordance with national policy and guidance. However, in light of the high level of identified housing need within the Study Area vis-à-vis the confirmed urban capacity potential, there is a need to revisit the respective site assessment processes to ensure no stone has been left unturned in seeking to maximise urban capacity potential.

As part of the Stage 1 process, sites deemed to be unsuitable for residential development within the respective land assessments have been reassessed for residential development potential. Within the Study Area, and assuming the respective Councils' adopted density policy standards, this process has identified additional potential capacity above that already confirmed within the respective Luton and Central Bedfordshire land assessments, for approximately 4,567 dwellings (3,948 dwellings within Luton and 1,393 dwellings within Central Bedfordshire).

However, as this potential additional capacity is reliant on policy constraint change decisions and / or landowners and developers confirming the release of the sites for residential development, it is considered unreasonable to conclude that all of the identified potential additional capacity can be confirmed as being deliverable or developable.

It is however, considered reasonable to expect between 25% and 50% of this identified additional capacity potential could ultimately be confirmed as being deliverable and developable by the respective Councils'. Again based on the existing density policy thresholds applied by the Councils', this could provide between approximately 1,142 and 2,283 additional dwelling capacity within the Study Area (between 794 and 1,587 additional dwelling capacity within Luton and between 348 and

696 additional dwelling capacity within Central Bedfordshire).

The Stage 1 Baseline urban capacity potential within the Study Area is between 18,707 and 19,849 dwellings (between 8,967 and 9,760 within Luton and between 9,741 and 10,084 dwellings within Central Bedfordshire). This represents an increase from the respective land assessment studies of between 1,142 and 2,283 dwellings (between 794 and 1,587 dwellings for Luton and between 348 and 696 for Central Bedfordshire).

Stage Two: Density Scenario Testing

Given the Study Area has an acutely restricted supply of land and a significant identified need for housing it is imperative that the most effective use of land is made. However, existing and emerging policy, guidance and best practice from around England shows that the current housing density targets / thresholds applied by the Councils' within the Study Area are currently potentially failing to make the most efficient use of land, particularly in town centre locations and other highly accessible transport hub locations.

As part of the Stage 2 process the already confirmed capacity and the additional capacity identified as part of the Stage 1 process have been subjected to three alternative higher density scenarios. The density scenarios sequentially decrease away from Luton town centre and mainline railway stations within the Study Area.

Of the three density scenarios tested, Scenario 4, which applied 200 dwellings per hectare within Luton town centre and sequentially decreasing to 30 dwelling per hectare on less accessible urban fringe greenfield sites, is considered to be the most appropriate scenario to make the most efficient use of land within the Study Area.

The application of the higher Scenario 4 density range, coupled with the additional potential housing capacity identified as part of the Stage 1 process, increases the potential urban capacity within the Study Area by between approximately 1,051 and 1,244 dwellings (between 1,251 and 1,444 dwellings within Luton, but a decrease in Central Bedfordshire's capacity by 200 dwellings) from the Stage 1 Baseline position.

Overall, the urban capacity potential within the Study Area is considered to be between approximately 19,758 and 21,093 dwellings within the Study Area (between 10,217 and 11,204 dwellings within Luton and between 9,541 and 9,889 dwellings within Central Bedfordshire).

This represents an increase of between 2,192 and 3,527 dwellings from the Councils' currently confirmed Study Area urban potential capacity (17,566 dwellings). For the respective Councils' this represents an increase of between 2,044 and 3,031 dwellings for Luton and between 148 and 496 for Central Bedfordshire.

1.0 Introduction

- 1.1 Central Bedfordshire Council (“CBC”) is preparing a new Local Plan which will replace the South Bedfordshire Local Plan (2004), the Core Strategy and Development Management Policies Development Plan Document (North) (2009) and the Site Allocations Development Plan Document (North) (2011). The Luton, Dunstable and Houghton Regis Urban Capacity Potential Study (“the Urban Capacity Potential Study”) will form part of the evidence base which underpins the new Local Plan.
- 1.2 In accordance with the National Planning Policy Framework (“NPPF”) and the National Planning Practice Guidance (“PPG”) the new Local Plan will meet the objectively assessed needs for market and affordable housing (“OAN”) in the housing market area, as far as is consistent with the policies set out in the NPPF, when taken as a whole.
- 1.3 The Luton and Central Bedfordshire Strategy Housing Market Assessment Update (2015) (“SHMA 2015”) concludes that the full unconstrained OAN within the housing market area is 47,300 new homes (2,365 dwellings per annum (“dpa”)) over the period 2011 to 2031. The OAN for Luton is 17,800 new homes (890dpa) and 29,500 new homes (1,475dpa).
- 1.4 Luton’s Strategic Housing Land Availability Assessment, 2016 (“Luton SHLAA 2016”) identifies capacity to deliver approximately 8,173 dwellings. This level of identified capacity is significantly lower than Luton’s OAN (46% of OAN).
- 1.5 In accordance with the NPPF, where a local council is unable to meet OAN in full within its own administrative boundary, as is the case for Luton, any unmet needs should where possible be met within adjoining authorities within the housing market area.
- 1.6 In light of the fact that Luton will be unable to meet its full OAN within its administrative area given its tightly drawn administrative boundary, a Growth Options Study is being prepared by the local authorities that fall within the Luton Housing Market Area (“Luton HMA”) ¹. This study will identify options for delivering the OAN within the HMA, including unmet need arising from Luton. The Growth Options Study will inform the new Local Plan for Central Bedfordshire.
- 1.7 CBC consider that the urban areas of Luton, Dunstable and Houghton Regis are extremely important in terms of the contribution they make, and will continue to make, towards meeting the housing needs of Luton as well as for CBC. The purpose of the Urban Capacity Potential Study is to therefore ensure that a full assessment is made of this area and its future housing

¹ Central Bedfordshire, Luton, Aylesbury Vale and North Hertfordshire.

delivery potential. The structure of the Urban Capacity Potential Study therefore comprises:

Stage 1: Baseline Urban Capacity Potential

- 1.8 Assessing and confirming the baseline residential development urban potential capacity of sites within the Luton, Dunstable and Houghton Regis area (“the Study area”). A plan showing the extent of the Study area is included in Appendix 1.

Stage 2: Density and Delivery Potential

- 1.9 Alternative density scenario testing of the Stage 1 baseline urban capacity potential position.

2.0 Stage One: Baseline Urban Capacity Potential

Planning Policy Context

- 2.1 Encouraging the effective use of land by reusing land that has been previously developed has been a longstanding Government commitment and is one of the NPPF's core planning principles. This is emphasised by the Government's current commitment to achieve permissions for housing on 90% of existing previously development land across England by 2020.
- 2.2 Set within this context, when planning to meet OAN the NPPF sets a requirement to prepare a land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.
- 2.3 To assist and guide local councils, the PPG also includes a specific section on housing and economic land availability assessments. In assessing the suitability and development capacity of sites, authorities should be guided by: the development plan; emerging plan policy and national policy; and market and industry requirements. Opportunities as well as constraints should be taken into account when assessing site suitability. Constraints are factors which limit or restrict the ability to develop a site. Opportunities are beneficial factors such as contributing to regeneration or a community aspiration.
- 2.4 The PPG is clear that where constraints are identified consideration should be given to what action would need to be taken to remove them. The PPG also outlines that where insufficient sites have been identified against OAN, as is the case in Luton, plan-makers will need to revisit and change the assumptions (physical and policy constraints) on the development potential on particular sites. Indeed, on this specific matter the Inspector examining the Brighton and Hove Local Plan in 2013 concluded that that the Council 'must leave no stone unturned' in seeking to meet as much of its identified housing needs as possible.
- 2.5 On the matter of whether housing needs override constraints on the use of land the PPG reiterates the principles of the NPPF's presumption in favour of sustainable development. The presumption in favour of sustainable development outlines that Local Plan's should meet OAN unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework [NPPF] taken as a whole, or specific policies in the Framework [NPPF] indicate development should be restricted. The specific restrictive policy designations referenced (paragraph 14, footnote 9), which are relevant to the Study area, include: Sites of Special Scientific Interest; Green Belt, Local

Green Space; Areas of Outstanding Natural Beauty; designated heritage assets; and locations at risk of flooding.

Methodology

- 2.6 The principal land assessment studies used to identify sites within the Study Area comprise:
- (i) Luton Strategic Housing Land Availability Assessment (“SHLAA”) 2016;
 - (ii) Central Bedfordshire SHLAA 2014
 - (iii) Luton Employment Land Review (“ELR”) 2013; and
 - (iv) Central Bedfordshire ELR 2010.
- 2.7 No new site search or call for sites process has been undertaken as part of this Study.
- 2.8 Sites concluded as being suitable for residential development within the respective Study Areas land assessments are automatically taken forward to form part of the Stage 1 urban capacity potential baseline position.
- 2.9 Sites concluded as being unsuitable for residential development within the respective Study Area land assessments (listed above) have been reappraised as part of this Study. Although this assessment does not constitute a formal land availability assessment in the context of the PPG, the assessment does follow the methodology and guidance set out within the PPG for undertaking site assessments. In summary, the site assessment methodology draws on the following key policy and guidance documents:
- NPPF;
 - PPG;
 - Luton Local Plan 2001-2011 Saved Policies;
 - Luton Local Plan 2011-2031 Regulation 22 version (comprising the pre-submission Local Plan, policies map, town centre inset and schedule of proposed minor modifications;
 - South Bedfordshire Local Plan, January 2004; and
 - Central Bedfordshire Design Guide, March 2014.
- 2.10 Sites that are assessed to be potentially developable are taken forward to form part of the Stage 1 urban capacity potential baseline position. In light of the fact that not all of the sites identified as being potentially developable as part of this Study could or would ultimately come forward, the following site capacity discounting scenarios are applied:
- (i) 100% of the urban capacity potential baseline position;

- (ii) 75% of the urban capacity potential baseline position;
- (iii) 50% of the urban capacity potential baseline position; and
- (iv) 25% of the urban capacity potential baseline position.

Baseline Density Assumption

- 2.11 The adopted Luton Local Plan (Policy H3) requires new residential developments to be at a density of 40 dwellings per hectare (“dpa”). In the central area or in areas with good accessibility by modes of transport other than the private car residential densities should be at a density of 50 dpa or above, unless it can be demonstrated that there would be significant adverse impact or lower densities can facilitate an identified local housing need. Specific density targets have been omitted from the emerging Luton Local Plan. However, Policy LP25, amongst other things, seeks to optimise higher densities.
- 2.12 Although within the Study Area there are no specific density targets set within the current South Bedfordshire Local Plan, Policies H2 and H6 do encourage the effective use of residential land by seeking to ensure that development is at as high a density as is both compatible with the characteristic of the site and its surroundings and consistent with any need to provide amenity open space.
- 2.13 The Central Bedfordshire Design Guide, adopted for development management purposes in March 2014, outlines that higher densities (over 50dph) are appropriate in town centres and accessible locations while lower densities (below 25dpa) are appropriate towards the edges of development or in rural locations and small villages. The Design Guide provides numerous examples of achieving densities of at least 74dph within urban areas and location with good quality public transport services.
- 2.14 In light of the above existing local density policy context, as part of the Stage 1 baseline capacity position all sites have been assessed on the basis of achieving at least 50dph unless other relevant factors indicate otherwise. Relevant factors may include: recent planning history, including pre-application advice where applicable and available will also be taken into account on a site by site basis.

Baseline Urban Potential Capacity

Confirmed Capacity

- 2.15 Within the respective Study Areas land assessments, a total of 218 sites were confirmed as being deliverable, developable or suitable for residential development (196 sites within Luton and 22 sites within Central Bedfordshire). The baseline confirmed urban potential residential capacity is summarised within Table 2.1 below. A detailed schedule of the sites comprising

this capacity and the baseline density assumptions applied is included in Appendix 2.

Table 2.1: Baseline Confirmed Capacity

	Luton	Central Bedfordshire	Study Area
Dwellings	8,173	9,393	17,566

Potential Additional Capacity

- 2.16 Within the respective Study Areas land assessments, a total of 96 sites were assessed for suitability for residential development (91 within Luton and 5 within Central Bedfordshire). Of these 96 sites, 33 sites (41%) were assessed as being potentially developable, in whole or part, subject to removal of existing policy constraints or formal confirmation from the landowner that the site can be released for residential development.
- 2.17 The baseline additional urban potential residential capacity is summarised within Table 2.2 below. A detailed schedule of the sites comprising this potential additional capacity and the baseline density assumptions applied to each site is included in Appendix 3.

Table 2.2: Baseline Additional Potential Capacity

	Luton (Dwellings)	Central Bedfordshire (Dwellings)	Study Area (Dwellings)
100% Baseline Potential Capacity	3,174	1,393	4,567
75% Baseline Potential Capacity	2,381	1,044	3,425
50% Baseline Potential Capacity	1,587	696	2,283
25% Baseline Potential Capacity	794	348	1,142

Baseline Urban Potential Capacity

- 2.18 The Area Stage 1 baseline urban potential capacity, which comprises confirmed capacity and potential additional capacity for Luton, Central Bedfordshire and the Study Area as a whole, is set out within Tables 2.3 to 2.5 below.
- 2.19 Within the Study Area the total baseline potential housing capacity is approximately 22,133 dwellings (11,347 within Luton and 10,786 within Central Bedfordshire).
- 2.20 However, as outlined within the methodology section above, given it is considered unrealistic to assume that 100% of the total potential additional capacity could be delivered a discounting factor has been applied.

Table 2.3: Luton

Potential Capacity Discount Scenario	Confirmed Capacity (Dwellings)	Potential Capacity (Dwellings)	Total Capacity (Confirmed and Potential) (Dwellings)
100% Baseline	8,173	3,174	11,347
75% Baseline	8,173	2,381	10,554
50% Baseline	8,173	1,587	9,760
25% Baseline	8,173	794	8,967

Table 2.4: Central Bedfordshire

Potential Capacity Discount Scenario	Confirmed Capacity (Dwellings)	Potential Capacity (Dwellings)	Total Capacity (Confirmed and Potential) (Dwellings)
100% Baseline	9,393	1,393	10,786
75% Baseline	9,393	1,044	10,437
50% Baseline	9,393	696	10,089
25% Baseline	9,393	348	9,741

Table 2.5: Study Area

Potential Capacity Discount Scenario	Confirmed Capacity (Dwellings)	Potential Capacity (Dwellings)	Total Capacity (Confirmed and Potential) (Dwellings)
100% Baseline	17,566	4,567	22,133
75% Baseline	17,566	3,425	20,991
50% Baseline	17,566	2,283	19,849
25% Baseline	17,566	1,142	18,708

- 2.21 Within the Study Area, the 25-50% baseline potential capacity scenarios with 100% of confirmed capacity indicate that there is total potential capacity of between approximately 18,708 and 19,849 dwellings. This represents additional baseline capacity potential of between approximately 1,142 and 2,283 dwellings within the Study Area (between 794 and 1,587 dwellings within the Luton area and between 348 and 696 dwellings within the Central Bedfordshire area) above that concluded within the respective Study Area land assessments.

3.0 Stage Two: Density and Delivery Potential

Planning Policy Context and Best Practice

- 3.1 Specifically regarding densities the NPPF encourages local planning authorities to set out their own approach to housing density to reflect local circumstances. As part of encouraging good design the NPPF aims to ensure that developments optimise the potential of sites to accommodate development whilst responding to local character and history, and reflect the identity of local surroundings.
- 3.2 Maximising urban housing potential through higher density is one of a number of emerging changes to national planning policy that are currently being considered by the Government. The proposed changes seek to maximise the use of previously developed land within urban areas and encourage higher density residential development around accessible transport hub locations. Although the changes to the NPPF are still to be confirmed they do indicate the likely direction of future Government density policy and emphasise the important contribution that higher density development within accessible and central town centre locations can make towards helping to meet identified housing needs.
- 3.3 As previously referred within Section 2, the current density policies within the Study Area seek 50dpa or above within town centre and other accessible locations; and between 25 and 50dph in all other locations. These are densities targets more commonly associated with less accessible urban extension locations.
- 3.4 There is an acceptance within many towns and cities across England, which like Luton have high demand for housing but an acutely restricted supply of land due to tightly defined administrative boundaries, that the most appropriate approach to optimise land potential is to proactively encourage and support residential development at levels considerably higher than 50dph within town centre and other accessible urban locations.
- 3.5 This higher density approach is supported within the CABI Better Neighbourhoods: Making Higher Densities Work publication, which outlines that building at higher densities, can provide significant benefits for developers and residents alike. The report puts forward two alternative higher density approaches for urban locations: 'Urban villages' with densities of around 75 to 125dpa; and 'Infill in historic towns' with densities of around 80-140dpa.
- 3.6 Portsmouth and Southampton both have tightly drawn administrative boundaries and encourage residential development in excess of 100dph. The Portsmouth Housing Standards Supplementary Planning Document (2013) outlines that in accessible locations densities

need to be at least 100dpa; whilst in Southampton the Core Strategy (2010) sets out the following sequential density policy requirements that are linked to public transport accessibility levels (PTAL):

Table 3.1: Southampton Residential Density Standards

Density	Public Transport Accessibility Level (PTAL) rating
35 to 50dph	1 to 2
50 to 100 dph	3 to 4
100+ dph	5 to 6

- 3.7 Like Southampton, the London Plan's indicative housing density standards are also partly linked to public transport accessibility level ratings, but also three neighbourhood types: suburban; urban and central. A simplified summary of the London Plan density matrix is set out below within Table 3.2 and shows densities of between 35 to 405dph.

Table 3.2: London Plan Indicative Density Standards (Summary)

Location	Public Transport Accessibility (PTAL) (6 being the most assessable)		
	0 to 1	2 to 3	4 to 6
Suburban	35 to 75dph	35 to 95dph	45 to 130dph
Urban	35 to 95dpa	45 to 175dph	45 to 260dph
Central	35 to 110dph	65 to 240dph	140 to 405dph

- 3.8 Superdensities, a term given to densities in excess of 150dpa, are not confined to major urban areas such as London. Monitoring data from Woking Borough Council in Surrey, a town in many respects similar to Luton as it has a mainline railway station to London with journey times of around 30 minutes, outlines that over the period between 2006/07 and 2010/11 residential development within the town centre averaged 236dph. Similarly, planning application records in Cambridge City demonstrate successful delivery of densities in excess of 200pdh (11/0219/FUL: 214 dph; 10/0523/FUL: 206 dph; and 11/0633/REM 219dph).
- 3.9 Specifically regarding the Study Area, it is noted that a recently submitted planning application to Luton Borough Council on Land off Caddington Road, Luton (16/01146/FUL), which is an emerging allocation within the Local Plan, proposes a density of 158dph. This site is not within Luton town centre but is an urban fringe greenfield site. Furthermore the submitted mixed-use planning application on the Napier Gateway site (part of Napier Park), to the north of Luton Airport Parkway station proposes a density of 226dph (16/00900/FULEIA). This site is also not within Luton town centre, but is an accessible urban

location.

- 3.10 A common misconception is that high density development cannot achieve an appropriate mix of housing sizes, in particular family housing. However, Victorian terrace properties have a density of between 60 and 80dph and the East Thames Delivering Successful Higher – Density Housing Toolkit (Second Edition) demonstrates that 2 to 4 storey traditional housing types can be delivered within densities up to 120dph.
- 3.11 Furthermore, research undertaken as part of the 2008 RIBA Space at Home symposium demonstrated that in London, housing developments within a density range of 65 to 239dpa comprised on average 21% family sized homes (3+bed dwellings). Even densities within the 240 to 434dpa delivered on average 13% family sized homes.
- 3.12 As set out above, a reasonable interpretation of existing and emerging policy and guidance and best practice from around England is that the existing housing density targets applied by the Councils' within the Study Area are currently failing to make the best use of land.
- 3.13 An alternative higher density approach, which sequentially decreases away from Luton town centre and key transport hubs such as railway stations, has the potential to maximise urban capacity potential.

Density Scenario Methodology

- 3.14 In light of examples of existing and emerging density policy and guidance an overarching alternative sequential density approach has been identified which seeks to maximise housing density potential within Luton town centre and around railway stations (key transport hubs).
- 3.15 The sequential approach, set out within Table 3.3 below, is based on the 'Institute of Highways and Transportation: Guidelines for Providing for Journeys on Foot' for the generally acceptable distances people will walk (0 to 1,200 metres). A plan illustrating the sequential zone areas is included in Appendix 4.

Table 3.3: Accessibility Zones

Accessibility Zones	
Zone A	Within the defined Luton town centre boundary.
Zone B	Within 400m of the edge of the defined Luton town centre boundary and mainline railway stations within the Study Area.
Zone C	Within 401m and 800m of the defined Luton town centre boundary and mainline railway stations within the Study Area.
Zone D	Within 801m and 1,200m of the defined Luton town centre boundary and mainline railway stations within the Study Area.

Rest of Area	Sites within 1,201m of the defined Luton town centre boundary and mainline railway stations within the Study Area and the boundary of the Study Area
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3.16 In addition to the overarching sequentially decreasing density approach, three alternative indicative density threshold / target scenarios have also been developed through drawing on best practice from around England. These alternative density threshold scenarios are set out within Table 3.4 below.

Table 3.4: Density Threshold Scenarios

	Scenario 1 (Baseline) (dph)	Scenario 2 (dph)	Scenario 3 (dph)	Scenario 4 (dph)
Zone A	Baseline density assumptions	125	150	200
Zone B		100	125	150
Zone C		75	100	125
Zone D		50	75	100
Rest of Area		30 or 50	30 or 50	30 or 50

3.17 Sites within the ‘Rest of Area’ zone are distinguished as being either urban or greenfield sites. Unless other factors indicated otherwise, a density of 50pdh is considered appropriate for sites that are in existing urban locations and a density of 30dph is considered appropriate on greenfield sites on urban fringe.

3.18 Sites that have extant planning consent within the confirmed capacity have been excluded from density scenario testing. Based on the information within the respective SHLAAs’, the housing potential from this source totals 5,787 dwellings (5,552 within Luton and 235 within Central Bedfordshire).

3.19 For the reasons set out within Section 2, only the 25-50% baseline potential capacity scenarios have been taken forward for density scenario testing. The 25% and 50% potential additional capacity scenarios are considered to represent a reasonable and realistic proportion that could come forward through policy changes and proactive engagement with landowners / developers.

Density Scenario Appraisal

Confirmed Capacity

3.20 The density scenario outputs from the confirmed capacity sites for Luton, Central

Bedfordshire and the Study Area are set out within Tables 3.5 to 3.7 below.

Table 3.5: Luton Confirmed Capacity Density Scenario Outputs

	S1 (Baseline) (dwellings)	Scenario 2 (dwellings)	Scenario 3 (dwellings)	Scenario 4 (dwellings)
Sites with Planning Permission	5,552	5,552	5,552	5,552
Zone A	484	538	571	636
Zone B	797	737	902	1,063
Zone C	549	673	875	1,095
Zone D	139	139	171	227
Rest of Area	652	607	657	657
Total	8,173	8,246	8,727	9,230
Difference between S1 (Baseline) and Scenarios 2 to 4		73	554	1,057

Table 3.6: Central Bedfordshire Confirmed Capacity Density Scenario Outputs

	S1 (Baseline) (dwellings)	Scenario 2 (dwellings)	Scenario 3 (dwellings)	Scenario 4 (dwellings)
Sites with Planning Permission	235	235	235	235
Rest of Area	9,158	8,958	8,958	8,958
Total	9,393	9,193	9,193	9,193
Difference between S1 (Baseline) and Scenarios 2 to 4		- 200	- 200	- 200

Table 3.7: Study Area Confirmed Capacity Density Scenario Outputs

	S1 (Baseline) (dwellings)	Scenario 2 (dwellings)	Scenario 3 (dwellings)	Scenario 4 (dwellings)
Sites with Planning Permission	5,787	5,787	5,787	5,787
Zone A	484	538	571	636
Zone B	797	737	902	1,063
Zone C	549	673	875	1,095
Zone D	139	139	171	227
Rest of Area	9,810	9,565	9,615	9,615
Total	17,566	17,439	17,920	18,423
Difference between S1 (Baseline) and Scenarios 2 to 4		- 127	354	857

- 3.21 Within the Study Area the alternative density scenarios demonstrate that the number of potential dwellings that could be accommodated reduces by 126 dwellings or increases by 910 dwellings below or above the baseline confirmed capacity figure within the Study Area land assessments.
- 3.22 The negative figures relate to greenfield urban fringe sites which within the Scenario 2 to 4 have been largely assessed using a 30 dph assumption compared to the assumed 50dpa density assumption applied as part of the Stage 1 Baseline assessment process.

Potential Additional Capacity

- 3.23 The density scenario outputs for the potential additional capacity identified as part of the Stage 1 site assessment process (50% and 25% scenarios) for Luton, Central Bedfordshire and the Study Area are set out within Tables 3.8 to 3.10 below.

Table 3.8: Luton Potential Additional Capacity

	50% of Potential Additional Capacity (dwellings)				25% of Potential Additional Capacity (dwellings)			
	S1 (Baseline)	S2	S3	S4	S1 (Baseline)	S2	S3	S4
Zone A	49	110	133	177	25	55	66	88
Zone B	120	200	250	301	60	100	125	150
Zone C	9	13	17	21	4	6	9	11
Zone D	107	107	112	177	53	53	56	88
Rest of Area	1,303	1,299	1,299	1,299	652	650	650	650
Total	1,587	1,729	1,811	1,974	794	865	905	987
Difference between S1 Baseline and Scenarios S2 to S4		142	224	387		71	112	193

Table 3.9: Central Bedfordshire Potential Additional Capacity

	50% of Potential Additional Capacity (dwellings)				25% of Potential Additional Capacity (dwellings)			
	S1 (Baseline)	S2	S3	S4	S1 (Baseline)	S2	S3	S4
Rest of Area	682	682	682	682	348	348	348	348
Total	682	682	682	682	348	348	348	348
Difference between S1 Baseline and Scenarios S2 to S4		0	0	0		0	0	0

Table 3.10: Study Area Potential Additional Capacity

	50% of Potential Additional Capacity (dwellings)				25% of Potential Additional Capacity (dwellings)			
	S1 (Baseline)	S2	S3	S4	S1 (Baseline)	S2	S3	S4
Zone A	49	110	133	177	25	55	66	88
Zone B	120	200	250	301	60	100	125	150
Zone C	9	13	17	21	4	6	9	11
Zone D	107	107	112	177	53	53	56	88
Rest of Area	1,999	1,995	1,995	1,995	1,000	998	998	998
Total	2,283	2,425	2,507	2,670	1,142	1,213	1,254	1,335
Difference between S1 Baseline Total and Scenarios S2 to S4 Total		142	224	387		71	112	193

3.24 Under the 50% of identified additional potential capacity scenario, within the Study Area the alternative density scenarios demonstrate that the potential number of dwellings that could be accommodated increases by between 142 and 387 above the baseline 50% identified

additional potential capacity scenario capacity figure (S1 Baseline).

- 3.25 Under the 25% of identified additional potential capacity scenario, within the Study Area the alternative density scenarios demonstrate that the potential number of dwellings that could be accommodated increases by between approximately 71 and 193 dwellings above the baseline 50% identified additional potential capacity scenario capacity figure (S1 Baseline).

Total Urban Capacity Potential

- 3.26 The density scenario outputs for the confirmed capacity and the potential additional capacity identified as part of the Stage 1 site assessment process (50% and 25% scenarios) for Luton, Central Bedfordshire and the Study Area are set out within Tables 3.11 to 3.13 below.

Table 3.11: Luton Total Urban Capacity Density Scenarios

	100% of Confirmed Capacity and 50% of Potential Additional Capacity (dwellings)				100% of Confirmed Capacity and 25% of Potential Additional Capacity (dwellings)			
	S1 (Baseline)	S2	S3	S4	S1 (Baseline)	S2	S3	S4
Sites with Planning Permission	5,552	5,552	5,552	5,552	5,552	5,552	5,552	5,552
Zone A	533	649	704	813	509	594	637	725
Zone B	917	937	1,152	1,364	857	837	1,027	1,213
Zone C	558	685	892	1,116	553	679	884	1,105
Zone D	246	246	283	404	192	192	227	316
Rest of Area	1,955	1,906	1,956	1,956	1,304	1,257	1,306	1,306
Total	9,760	9,975	10,538	11,204	8,967	9,110	9,633	10,217
Difference between S1 Baseline Total and Scenarios S2 to S4 Total		215	778	1,444		144	666	1,251

Table 3.12: Central Bedfordshire Urban Capacity Density Scenarios

	100% of Confirmed Capacity and 50% of Potential Additional Capacity (dwellings)				100% of Confirmed Capacity and 25% of Potential Additional Capacity (dwellings)			
	S1 (Baseline)	S2	S3	S4	S1 (Baseline)	S2	S3	S4
Sites with Planning Permission	235	235	235	235	235	235	235	235
Rest of Area	9,854	9,654	9,654	9,654	9,506	9,306	9,306	9,306
Total	10,089	9,889	9,889	9,889	9,741	9,541	9,541	9,541
Difference between S1 Baseline Total and Scenarios S2 to S4 Total		-200	-200	-200		-200	-200	-200

Table 3.13: Study Area Urban Capacity Density Scenarios

	100% of Confirmed Capacity and 50% of Potential Additional Capacity (dwellings)				100% of Confirmed Capacity and 25% of Potential Additional Capacity (dwellings)			
	S1 (Baseline)	S2	S3	S4	S1 (Baseline)	S2	S3	S4
Sites with Planning Permission	5,787	5,787	5,787	5,787	5,787	5,787	5,787	5,787
Zone A	533	649	704	813	509	594	637	725
Zone B	917	937	1,152	1,364	857	837	1,027	1,213
Zone C	558	685	892	1,116	553	679	884	1,105
Zone D	246	246	283	404	192	192	227	316
Rest of Area	11,809	11,560	11,610	11,610	10,810	10,563	10,612	10,612
Total	19,849	19,864	20,427	21,093	18,708	18,652	19,174	19,758
Difference between S1 Baseline Total and Scenarios S2 to S4 Total		15	578	1,244		-56	466	1,051

- 3.27 Under the confirmed capacity and 50% of identified additional potential capacity scenario, within the Study Area the alternative density scenarios demonstrate that the potential number of dwellings that could be accommodated increases by between approximately 15 and 1,244 dwellings above the baseline 50% identified additional potential capacity scenario capacity figure (S1 Baseline – 19,849 dwellings).
- 3.28 Under the confirmed capacity and 25% of identified additional potential capacity scenario, within the Study Area the alternative density scenarios demonstrate that the potential number of dwellings that could be accommodated reduces by between -56 dwellings or increases by approximately 1,051 dwellings below or above the baseline 20% identified additional potential capacity scenario capacity figure (S1 Baseline –18,708 dwellings).

4.0 Conclusion

Stage One: Baseline Urban Capacity Potential

- 4.1 Whilst the respective land assessments within the Study Area have been prepared broadly in accordance with the NPPF and PPG it is evident that in light of the identified OAN within the Study Area vis-à-vis the confirmed capacity identified within the respective land assessments as being suitable for residential development, there is a need, in accordance with the PPG, to revisit and change the site assessment assumptions (physical and policy constraints) on the development potential of sites previously deemed to be unsuitable. Part of this process should include proactive engagement with landowners and developers to seek to remove potential barriers to bringing sites forward for residential development.
- 4.2 Subjecting the 96 sites deemed to be unsuitable for residential development within the respective land assessments to the Stage 1 site suitability process has identified additional potential capacity within the Study Area for 4,567 dwellings (3,174 within Luton and 1,393 within Central Bedfordshire).
- 4.3 However, given the need to make policy constraint change decisions and / or actively engage with landowners and developers to release the residential development potential on these sites it is considered unreasonable to conclude that all of the identified potential additional capacity can be confirmed as being deliverable or developable.
- 4.4 It is however, considered reasonable that between 25% and 50% of this identified additional capacity potential could be confirmed as being deliverable and developable. As summarised within Table 4.1 below, based on the existing density policy thresholds within the Study Area,

this could provide between 1,142 and 2,283 additional dwelling capacity within the Study Area (between 794 and 1,587 additional dwelling capacity within Luton and between 348 and 696 additional dwelling capacity within Central Bedfordshire).

Table 4.1: Stage 1 Baseline Urban Potential Capacity

	100% of Confirmed Capacity and 50% of Potential Additional Capacity (dwellings)			100% of Confirmed Capacity and 25% of Potential Additional Capacity (dwellings)		
	Confirmed Capacity	Potential Additional Capacity	Total Potential Capacity	Confirmed Capacity	Potential Additional Capacity	Total Potential Capacity
Luton	8,173	1,587	9,769	8,173	794	8,967
Central Bedfordshire	9,393	696	10,089	9,393	348	9,741
Study Area	17,566	2,283	19,849	17,566	1,142	18,708

Stage Two: Density Scenario Testing

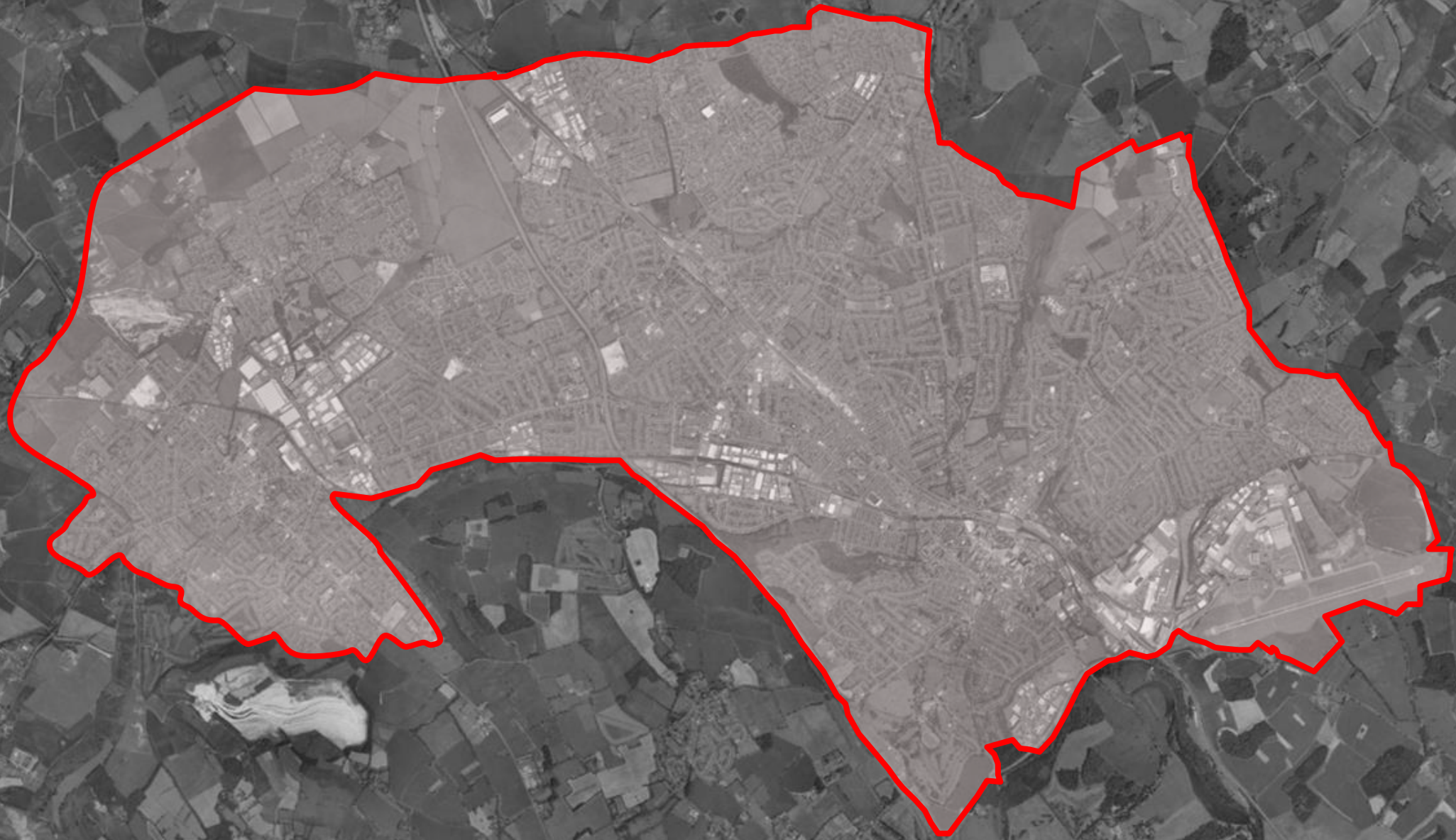
- 4.5 Given the Study Area has an acutely restricted supply of land and a significant identified need for housing it is imperative that the most effective use of land is made. However, it is evident from reviewing existing and emerging policy and guidance and best practice from around England that the existing housing density targets / thresholds within the Study Area are currently failing to make the most efficient use of land, particular in town centre locations and other highly accessible transport hub locations.
- 4.6 As part of the Stage 2 process the confirmed capacity and the potential additional capacity potential identified as part of the Stage 1 process were subjected to three alternative higher density scenarios which sequentially decreased away from Luton town centre and mainline railway stations within the Study Area.
- 4.7 Of the three density scenarios tested, Scenario 4, which applied a sequential density range of between 50 to 150dpa, is considered to be the most appropriate scenario to make the most efficient use of land within the Study Area.
- 4.8 As summarised within Table 4.2 below the application of the higher Scenario 4 density range coupled with the 25% or 50% additional potential housing capacity increases the urban housing potential capacity within the Study Area by between 2,192 and 3,527 dwellings (between 2,044 and 3,031 dwellings within Luton and between 148 and 496 dwellings within Central Bedfordshire).

Table 4.2: Comparison of Current Confirmed Capacity with Scenario 4 Density Confirmed and Potential Additional Capacity

	a	b		d	
	Current Confirmed Capacity (dwellings) (SHLAA based)	Confirmed Capacity and 50% of Potential Additional Capacity (dwellings) (Scenario 4)	Difference between current and potential capacity (dwellings) (b-a)	Confirmed Capacity and 25% of Potential Additional Capacity (dwellings) (Scenario 4)	Difference between current and potential capacity (dwellings) (d-a)
Luton	8,173	11,204	3,031	10,217	2,044
Central Bedfordshire	9,393	9,889	496	9,541	148
Study Area	17,566	21,093	3,527	19,758	2,192

- 4.9 Overall, the urban capacity potential within the Study Area is considered to be between approximately 19,758 and 21,093 dwellings within the Study Area (between 10,217 and 11,204 dwellings within Luton and between 9,541 and 10,217 dwellings within Central Bedfordshire).
- 4.10 This represents an increase of between 2,192 and 3,527 dwellings from the Councils' currently confirmed Study Area urban potential capacity (17,566 dwellings). For the respective Councils' this represents an increase of between 2,044 and 3,031 dwellings for Luton and between 148 and 496 for Central Bedfordshire.

Study Area



Appendix 3

Confirmed Urban Capacity Potential Sites

ID	Site name and address	Capacity	Capacity source
Luton Sites			
138	High Town Block C, Midland Road Passage	6	75dph on half of site allowing for employment/ other uses
147	High Town Block M, Burr Street	97	Proposals by developer
148	Station Quarter	375	Luton Gateway development brief (internal)
149	Marsh Farm Central Area	46	15/00785FUL
150	Power Court	550	16/01019/EIASCP
151	Telmere Industrial Estate	15	2013 employment land review
155	Guardian Industrial Estate	77	15/00959/FUL
160	Moreton Park Estate	18	07/01111/RENEW
161	Oxen Industrial Estate, Oxen Road	48	2013 employment land review
162	Sunrise Trading Estate	14	50dph
169	Land between Russel Rise and Corncastle Road	29	50dph
174	Land at Caleb Close	181	15/01507/OUT
175	Car Parks on Dunstable Place	41	10/00898/FUL
176	E	39	150 dph on half the site, allowing for other uses such as employment
180	Dalroad Industrial Estate	32	2001-2011 local plan
181	1-9 Ashwell Parade	13	50dph
182	69 Felstead Way	59	06/00744/REM 06/01465/REM 07/00279/REM
183	The Windsor Castle, 12 Albert Road	41	07/01110/FUL
188	142-144 Midland Road	40	07/01873/RENEW
189	4-6 Melson Street	16	07/01019/OUT
190	Extension to Mall	35	07/01897/OUT (124homes), minus 89 proposed by sites 202, 298 and 403
191	Napier Park, Kimpton Road	1,310	13/00280/OUT / 16/00900/FULEIA
192	Capwell Grange Nursing Home, Addington Way	75	06/00952/FUL
194	4-8 Arundel Road	11	07/01781/REM
198	Rear of 66-76 Castle Street	11	03/00562/FUL
199	27-37 Chapel Street	30	05/00826/FUL
200	62 - 64 Chapel Street	12	06/00475/FUL
201	21-25 Chapel Street	39	14/00005/FUL

ID	Site name and address	Capacity	Capacity source
202	37-47 Cheapside	59	04/01068/FUL
203	45-47 Collingdon Street	11	14/00612/FUL
205	15-19 Downs Road	14	14/01590?FUL
206	Land to rear of 31-37 Downs Road	14	05/01784/FUL
207	41 Dudley Street	25	11/01291/FUL
208	13-31 Dunstable Road	124	07/00831/RENEW
209	326 - 340 Dunstable Road	24	07/00698/OUT
210	Land opposite Whitbread House, Flowers Way	168	14/00713/FUL
213	33 Guildford Street	11	06/01189/FUL
214	35 Guildford Street	14	05/01492/FUL
218	39-51 John Street	39	14/01036/FUL
220	Luton Town Football Club, Kenilworth Road	59	75dpa on half the site - remainder open space
222	Crescent House, 1-5 Latimer Road	80	06/00381/FUL
224	46 London Road	13	05/01744/FUL
229	Phoenix House, 2 - 4 Mill Street	38	05/00892/FUL
230	30 Mulberry Close	26	14/00456/OUT
233	6-14 Old Bedford Road	39	09/00487/FUL
235	7A Old Bedford Road	13	13/01333/FUL
237	9 - 15 Oxford Road	12	07/00711/FUL
238	42-44 Park Street	17	04/01840/FUL
240	51-55 Princess Street	12	02/01631/FUL
241	43 Ridgway Road	18	06/00613/FUL
245	7 Windmill Road	8	07/00501/FUL
248	566-568 Dunstable Road	10	04/01751/FUL
298	47 - 53 Bute Street	12	07/00897/COU
300	Chaucer House, 134 Biscot Road	14	08/00098/FUL
301	18-22 Rothesay Road	14	08/00056/FUL
303	Car park adjacent to 69 Adelaide Street	11	08/01086/RENEW
304	89 - 93 Park Street	13	08/01039/RENEW
305	34-38 Crescent Road	74	08/01090/FUL
306	1 Dudley Street	10	08/01303/FUL
307	GT House, 24-26 Rothesay Road	12	08/01267/FUL
319	7-11 King Street	14	09/01088/RENEW
320	111 North Street	14	09/00852/RENEW
321	Petrol Station, 116-124 Wingate Road	13	09/00302/OUT
323	5 Empress Road	14	09/00985/FUL

ID	Site name and address	Capacity	Capacity source
324	Land at Burfield Court	12	2010 Call for Sites
332	The Mount, 136 Tennyson Road	17	50dph
333	Sherd Lodge, Sherd Close	49	15/01600/FUL
337	Land to the west of Newlands Road	392	14/01609/OUT
339	Land at Stockingstone Road	56	50dph on half the site to allow for leisure/ other uses
340	Land at Union Street/ Oxford Road	10	13/00627/FUL
342	The Laurels, Ely Way	14	2014 pre- application discussion with outline plan
345	Milan Day Centre, Solway Road North	9	2016 pre app
348	27 Crawley Road	11	10/00789/FUL
351	27A Upper George Street	26	09/00175/OUT
352	40-58 Collingdon Street	88	10/01131/FUL
353	Car park adjacent to 95 Maple Road East	49	75dph
354	Shops at 247 to 259 Birdsfoot Lane	11	75dph on half of site to allow for other uses
357	68 to 80 Dunstable Road	18	75dph
359	Bramingham Centre, Weltmore Road	51	2016 pre app
360	International House, Eaton Green Road	18	50dph
361	2 to 32 Beechwood Road	15	50dph on half of site allowing for employment/ other uses
363	Royal Mail, Sarum Road	11	75dph
364	10 to 12 Caleb Close	24	75dph
370	Leagrave Service Station, High Street.	21	75dph
382	Land behind 2 to 26 Osborne Road	35	50dph on area of lower ecological value
383	Land south of Gipsy Lane	126	50dph
387	124 Crawley Green Road	12	15/00464/FUL
394	Garage blocks at Sylam Close	10	50dph
395	Garage blocks at Winchester Gardens	11	50dph
396	Garage blocks rear of 1 to 47 Strangers Way	12	50dph
397	Garage blocks at Flint Close	14	50dph
398	Garage blocks at Waleys Close	14	50dph
399	Garage blocks at Arrow Close	31	50dph
401	Whitbread House, Flowers Way	96	14/00771/FUL
402	Land at the Orchard Centre, Strangers Way	27	2016 pre app
403	47 Guildford Street	10	2013 review of town centre office premises
404	Napier House, 17-21 Napier Road	30	15/01554/COM

ID	Site name and address	Capacity	Capacity source
405	2 Dunstable Road	15	2013 review of town centre office premises
406	Unity House, 111 Stuart Street	101	15/01506/FUL
407	56 Park Street	39	15/00855/COM
408	Abbeygate Business Centre, Hitchin Road	12	2013 employment land review
411	16 to 36 South Road	36	15/01832/OUT
412	38a Wingate Road	15	50dph on half of site allowing for other uses such as employment
413	Plaza 668, Hitchin Road	13	75dph on half of site allowing for other uses such as employment
415	22 to 36 Hastings Street	18	12/00013/OUT
416	Link House, 49 Alma Street	12	2013 review of town centre office premises
417	The Albany, 4 Cardiff Road	12	2013 review of town centre office premises
420	Victoria House, Vicoria Street	12	2013 review oftown centre office premies
422	Land and buildings at and behind 98-100 Wenlocl Street	6	05/00077/OUT
423	Downton Court, Brook Street	8	14/00317/FUL
425	14 South Road	8	11/00317/FUL
426	4 Dunstable Place & 9 Upper George Street	8	11/01071/REMCON
429	Land rear of 27 Salisbury Road	10	14/00951/OUT
431	25-31 Chester Avenue	8	10/00831/REM
433	Land adj. to 18, 18a Cowper Street and 17 Tavistock Crescent	6	11/01059/REMCON
436	2 Thornhill Road	6	05/01585/AMEND
439	Mill Gardens, 16 - 26 Mill Street	5	11/00227/COU
440	153 New Town Street	5	11/00493/FUL
441	Land rear of 92 Oakley Road	5	08/00343/RENEW
446	Maxet House and 26-34, Liverpool Road	20	2013 ELR
451	Beech House, 6 Cardiff Road	14	14/00281/COM
453	Land adjacent to the Baptist Church, Cumberland Street	11	75dph
456	Connaught House, 15-17 Upper George Street	15	14/00374/COM
458	12-14 Park Street	30	15/01161/COM
459	Land at Clinton Avenue	36	pre-application discussion
460	Britannia Estate	294	pre-application discussion
465	Land adjacent ro 139 amd 213 Turnpike Drive	19	Extant PP
470	Wigmore Hall	9	50dph
471	Saints Community Centre	8	2016 pre app
472	The Old School House, Trinity Road	7	50dph

ID	Site name and address	Capacity	Capacity source
476	Bowling green at Abigail Close	4	13/00818/FUL
477	The Parrott, Whipperley Ring	25	2016 pre app
478	The Roman Way, Tomlinson Avenue	20	2016 pre app
479	Former recreation centre, Old Bedford Road	80	14/01145/FUL
480	52 Duke Street	12	14/01318/FUL
481	Land to the north-west of 52 Duke Street	10	pre-application discussions
482	High Town plot 7	27	High Town masterplan (draft, January 2016)
483	High Town plot 5A	3	High Town masterplan (draft, January 2016)
484	Albion Road employment block	9	2013 employment land review (12 in total with ID 483)
485	High Town plot 5B	21	High Town masterplan (draft, January 2016)
486	High Town plot 1A	75	High Town masterplan (draft, January 2016)
487	High Town plot 1C	19	High Town masterplan (draft, January 2016)
488	High Town plot 1D	27	High Town masterplan (draft, January 2016)
489	High Town plot 1B	35	High Town masterplan (draft, January 2016)
490	High Town plot 2A	63	High Town masterplan (draft, January 2016)
491	High Town plot 2B	16	High Town masterplan (draft, January 2016)
492	High Town plot 3	31	High Town masterplan (draft, January 2016)
493	High Town plot 6C	12	High Town masterplan (draft, January 2016)
494	High Town plot 6D	39	High Town masterplan (draft, January 2016)
495	2-14 Taylor Street	17	2013 employment land review
496	High Town plot 6A	60	High Town masterplan (draft, January 2016)
497	High Town plot 6B	18	High Town masterplan (draft, January 2016)
498	Albany and Concorde Houses, Concorde Street	5	2013 employment land review (15 in total with ID 449)
499	High Town Road employment block	38	2013 employment land review
500	7-21 Taylor Street	10	2013 employment land review
501	High Town plot 4	49	2016 pre-application consultation
502	High Town Enterprise Centre, York Street	17	2013 employment land review
503	High Town plot 8	23	High Town masterplan (draft, January 2016)
504	High Town plot 9	9	High Town masterplan (draft, January 2016)
509	Alsace Cottage, Stockwood Park	11	50dph

ID	Site name and address	Capacity	Capacity source
518	Wardown Park north lodge	7	50dph
519	Birdsfoot Lane depot	16	2016 pre-application discussion
521	Land at 210 Sundon Park Road	21	75dph
525	2A Montague Avenue	5	14/00440/FUL
526	31 Alma Street	5	15/01348/COM
527	Land adjacent to 35 Albert Road	5	15/00647/FUL
528	Land adjacent to 102 Hitchin Road	6	15/00180/FUL
529	31 West Hill Road	6	15/00425/OUT
530	Land rear Of 81 Dumfries Street	7	14/01362/FUL
531	Abacus Court, 17 - 33 Dudley Street	7	16/00561/COM
532	2B Medina Road	8	15/00620/FUL
533	15 - 17 Cardiff Road	8	15/00168/COM
534	23 - 27 King Street	9	15/00777/FUL
535	The Compasses, 11 Farley Hill	9	14/01546/FUL
536	9 - 15 Adelaide Street	9	14/00907/OUT
537	36 - 40 Liverpool Road	10	15/01548/COM 15/01549/COM 14/01439/COM
538	32 King Street	13	14/01548/COM
539	79 - 81 Windsor Walk	14	14/00539/FUL
540	112-114 Marsh Road	19	14/00762/FUL
541	61 George Street	19	14/01475/FUL
542	28 Dunstable Road	29	15/01015/COM
543	39 Castle Street	35	14/00710/OUT
544	26 - 38 John Street	49	15/00437/FUL
545	39 - 49 Manor Road	94	15/00483/FUL
546	1 - 1A Stanley Walk	5	11/01116/FUL
547	Garage court adj to 16 Barnard Road	5	15/01383/FUL
548	Land adj to 43 Bute Street	8	14/00776/FUL
549	The Robin Hood, 81 New Town Street	10	14/00969/FUL
550	1 Telford Way	12	03/01587/COM
551	214 to 220 Hitchin Road	12	14/01349/FUL
552	179 - 185 Dunstable Road	12	15/00182/FUL
553	Land rear of 23-29 Farley Hill	14	13/01577/OUT
554	Melson Arms, 63 - 65 John Street	17	13/00974/FUL
555	33 - 35 Upper George Street	25	15/00164/COU

ID	Site name and address	Capacity	Capacity source
556	Units 1 And 2 Spring Place and 4 - 6 Dumfries Street	313	14/00945/FUL 15/00960/FUL
557	49 to 57 Castle Street	69	2016 pre-application discussion
Luton Capacity		8173	

ID	Site name and address	Capacity	Capacity source
Central Bedfordshire Sites			
CBC108	Royal Mail's Dunstable DO, Dunstable	45	0.89ha. @ 50dpa
CBC109	Land at West Street, Dunstable	170	Application submitted 15/03052/OUT
CBC110	57-75 London Road, Dunstable	27	0.53ha. @ 50dpa
CBC113	Priory View, Church Street Dunstable	83	Taken from development proposal consultation leaflet
CBC157	Bedford Road, Houghton Regis	169	Full planning permission 14/0356
CBC158	Land at the Bungalow Redford Road, Houghton regis	51	1.01ha @50dph
CBC159	Bury Spinney, Thorn Road, Houghton Regis	100	Outline application 16/0208/OUT
CBC160	Houghton Regis North, Houghton Regis	5,150	Houghton Regis North (Site 1) HRN1 outline planning permission for 5,150 dwellings 12/03616/OUT
CBC161	North Houghton Regis Site 2 (SSSA Site), Houghton Regis	1,850	Houghton Regis North (Site 2) HRN2 outline planning permission for 1,850 dwellings 15/00297/OUT
CBC162	Land North East of HR, Houghton Regis	350	Pre-app PPA for up to 350 dwellings
CBC163	Kingsland Community College, Houghton Regis	800	20ha. @ 40dph
CBC165	Nursery Site, Sundon Road (Osborne House and Windy Willows Nursery), Houghton Regis,	30	Applicaton 15/02223/OUT
CBCi	Balkan Cars, High St North, Dunstable	28	Status: Allocated site H1(3)
CBCii	Gas Works Site, North Station Way, Dunstable	26	Status: Allocated site H1(5)
CBCiii	Dunstable Master Plan Site 1: Ashton Square Car Park	140	Status: Emerging site through Master Plan
CBCiv	Dunstable Master Plan Site 2: Priory House Gardens	18	Status: Emerging site through Master Plan
CBCv	Dunstable Master Plan Site 3: Redevelopment of Wilkinson's area	15	Status: Emerging site through Master Plan
CBCvi	11-15 High Street South, Dunstable	26	Planning Permission CB/14/04720

ID	Site name and address	Capacity	Capacity source
CBCvii	Downing View, 1-3 Loring Road, Dunstable	17	Planning Permission CB/15/04829
CBCvii	Red House Court, Houghton Regis Central	137	Redevelopment site - Brownfield
CBCix	Linpac site, Luton Road, Dunstable	100	Planning Application 15/02821
CBCx	Bedford Road, Houghton Regis	62	62 PP granted
Central Bedfordshire Total		9,393	

Study Area Total	17,566	
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Appendix 3

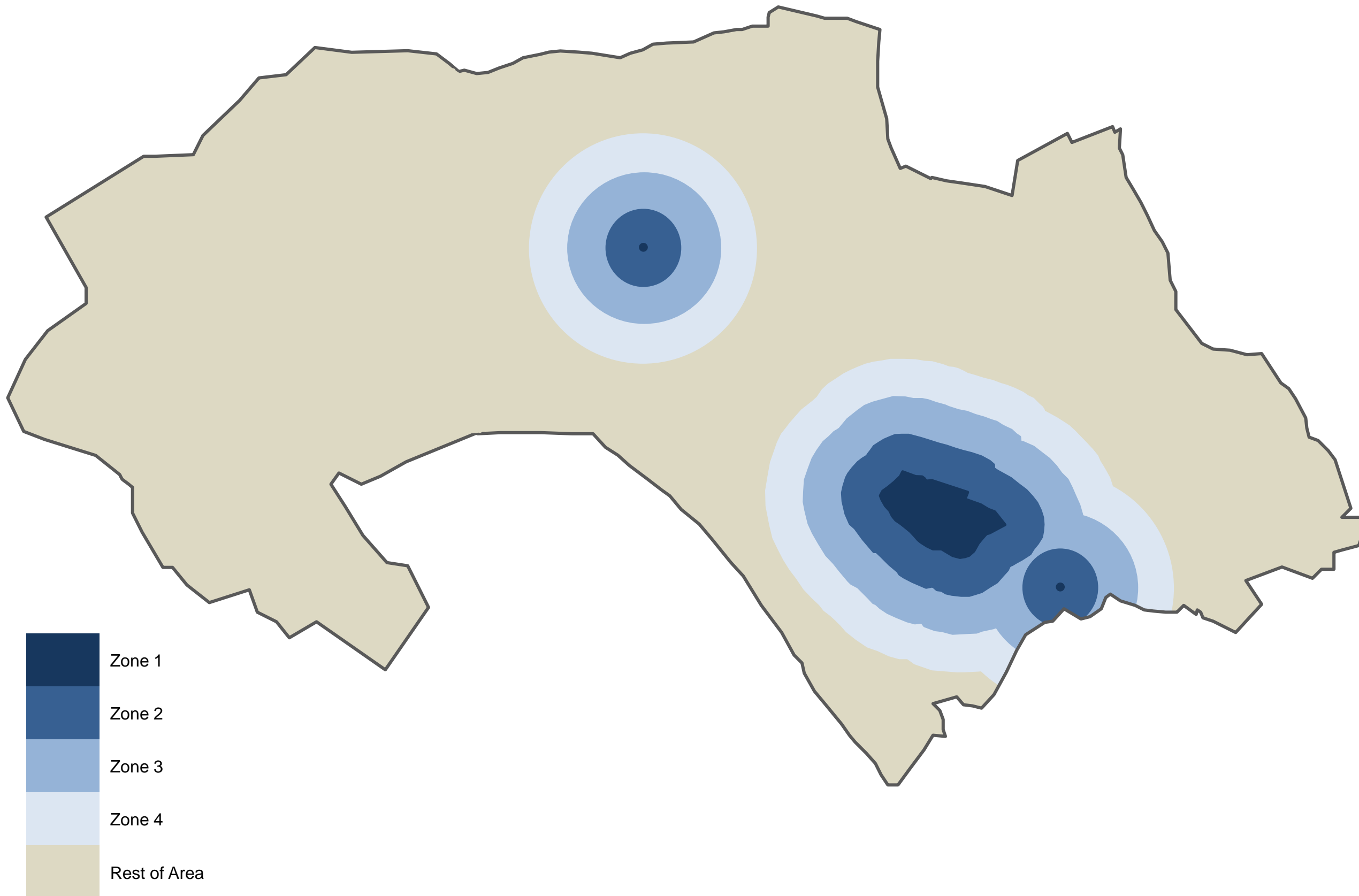
Sites assessed as potentially deliverable

SHLAA ID	LPA Area	Site name and address	Capacity (homes)	Density Assumption	Current / or last known use(s)
SHLAA 136	LBC	High Town Block A, Midland Road West	29	75dph	An office (converted house) B1 Use; a small light industrial B2 Use and scrubland
ELR Site 118	LBC	Castle Quarter	69	1.38ha. @ 50dph	Commercial Use
SHLAA 156	LBC	Windmill Trading Estate, Thistle Road	110	75dph	B1/ B8
ELR Site 38	LBC	Flowers Industrial Estate	24	0.48ha. @ 50dph	Commercial Use
ELR Site 42	LBC	Holly Street	36	0.67ha. @ 50dph	Commercial Use
ELR Site 47	LBC	Langley Terrace	36	0.72ha. @ 50dph	Commercial Use
ELR Site 72	LBC	New Town Trading	22	0.43ha. @ 50dph	Commercial Use
ELR Site 120	LBC	Frederick Street	12	0.24ha. @ 50dph	Commercial Use
SHLAA 381	LBC	Car storage area adjacent to 2 to 20 Kimpton Road	17	50dph	Car storage area/ electricity pylons
SHLAA 355	LBC	Telephone exchange, 177 Waller Avenue	120	75dph	Commercial
SHLAA 356	LBC	187 to 189 Waller Avenue	71	75dph	Commercial
ELR Site 93	LBC	Off 127 New Bedford Road	22	0.43ha. @ 50dph	Commercial Use
SHLAA 157	LBC	Arundel Road Industrial Estate	47	50dph	Potentially developable
SHLAA 159	LBC	Chaul End Lane Industrial Land	39	2013 employment land review identifies	Potentially developable

SHLAA ID	LPA Area	Site name and address	Capacity (homes)	Density Assumption	Current / or last known use(s)
				potential for 21 units on southern site. Northern site might support 18 units @ 50dph	
SHLAA 179	LBC	Land to rear of Bank Close	12	2001-2011 Local Plan	Potentially developable
SHLAA 327	LBC	Cawleys, 1 Covent Garden Close	86	50dph	Potentially developable
SHLAA 328	LBC	Vauxhall Trailer Park, Eaton Green Road	120	50dph	Potentially developable
SHLAA 372	LBC	Units 5 to 8, North Luton Industrial Estate, Sedgwick Road	80	50dph	Potentially developable
SHLAA 373	LBC	Aerial Site, Kestrel Way	62	50dph	Potentially developable
SHLAA 377	LBC	96 A Kingsway	118	50dph	Potentially developable
SHLAA 378	LBC	81 Arundel Road	15	50dph	Potentially developable
SHLAA 393	LBC	Land adjacent to Vauxhall Way	258	50dph	Potentially developable
SHLAA 461	LBC	Land at western edge of Stockwood Park	20	50dph	Potentially Developable
SHLAA 469	LBC	Land at Manor Farm	257	25dph (considerate of landscape impact)	Potentially Developable
ELR Site 37	LBC	Firbank	44	3.24ha. @ 50dph /3 minus SHLAA Site 377	Potentially developable
ELR Site 82	LBC	Selbourne Road	209	4.17ha. @ 50dph	Potentially developable
ELR Site 104	LBC	Depot Portland Road	218	4.36ha. @ 50dph	Potentially developable
ELR Site 40	LBC	Greewood Court	21	0.42ha. @ 50dph	Potentially developable

SHLAA ID	LPA Area	Site name and address	Capacity (homes)	Density Assumption	Current / or last known use(s)
558	LBC	Luton Rugby Club, Newlands Road	1,000	LBC have assumed density based on neighbouring approved site (ID337)	Potentially developable
CBDC 106	CBC	North West Dunstable (Land between Sewell Cutting and Green Lane), Dunstable	1,323	44.1ha @ 30dpa (Site assessed CBC as being suitable to accommodate 30dph)	Potentially Developable
CBDC 107	CBC	Lawrence Way Industrial Estate, Dunstable	70	1.39ha @ 50dpa	Potentially Developable

Study Area Sequential Density Zone Areas



Appendix 2: Pilot Brownfield Register (as at May 2017)

The following brownfield register was prepared in accordance with the requirements of the Government's pilot scheme.

Legislation governing the preparation of brownfield registers came into force in April 2017 and additional practice and technical guidance is expected in summer 2017. The current pilot register may not meet the formal requirements of this legislation and guidance. Once the additional guidance is published, the Council will review the pilot register to ensure it meets the formal requirements of the legislation with a view to publishing it on the website by the deadline of 31 December 2017.

Reference	Alternative Reference	Site Name	Site Address	UPRN	Easting	Northing	Size (Ha)	Planning Status	Ownership	Housing Estimate	Minimum Homes	Organisation URI	Organisational Label	First Added Date	Last Updated Date	Notes
CB/16/02366/BRWN	CB/15/03143/OUT	Brook Side	Brook Side, Watling Street, Hockliffe, Leighton Buzzard, LU7 9NF	100081006404	497,103.00	226,955.00	0.57	Permissioned	Not in Public Ownership	5	5	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Outline Planning Permission for the construction of 5 detached houses with access road.
CB/16/02392/BRWN	CB/15/01764/FULL	The Warren	The Warren, 198 Billington Road, Leighton Buzzard, LU7 9HH	100081005091	492,860.00	223,784.00	0.39	Permissioned	Not in Public Ownership	6	6	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Full Planning Permission for 6 dwellings with garages and car parking. Part Brownfield and residential site
CB/16/02393/BRWN	CB/14/04406/OUT	Station Approach	Station Approach, Station Road, Linslade	10002278743	491,158.00	225,032.00	0.31	Permissioned	Not in Public Ownership	25	25	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Outline Planning Permission for approximately 25 residential dwellings up to 3 storeys in height to include basement car parking
CB/16/02405/BRWN	CB/15/03100/FULL	67 St Johns Street	67 St Johns Street, Biggleswade, SG18 0BT	100080068375	519,119.00	245,093.00	0.33	Permissioned	Public Ownership	10	10	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Planning permission for remediation of the former gas works for the improvement of the site and to reduce potential environmental liabilities.
CB/16/02714/BRWN	CB/15/02327/FULL	Woodlands Nurseries	Woodlands Nurseries, Biggleswade Road, Upper Caldecote, SG18 9BJ	100081253144	517,807.01	245,956.76	0.17	Permissioned	Not in Public Ownership	9	7	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Planning permission for change of use and conversion of building used for office and separate B8 storage to 9 flat units.
CB/16/02723/BRWN	ALP474	Home Farm House	Cattery, Home Farm House, Dunton Lane, Biggleswade, SG18 8QU	100081252804	520,646.20	243,605.25	0.61	Not Permissioned	Not in Public Ownership	12-15	15	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Cattery building and general storage building used for both ancillary domestic and commercial storage.
CB/16/02727/BRWN	ALP307	Dell Mount	Dell Mount, Bedford Road, Houghton Regis, Dunstable, LU5 6JP	200001730379	501,594.00	224,309.00	0.75	Not Permissioned	Not in Public Ownership	20-25	18	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Gospel Hall (Use Class D1) - Hall presently in use but promoted for redevelopment. Will be subsumed within HRN development. 2015 pre-app for demolition and erection of 20-25 units.
CB/16/02728/BRWN	CB/16/04896/FULL	4 High Street	4 High Street, Meppershall, Shefford, SG17 5LX	100081252089	513,947.00	236,738.00	0.33	Permissioned	Not in Public Ownership	10-15	10	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Full Planning Permission for demolition of buildings and erection of 7 dwellings.
CB/16/02730/BRWN	ALP407	The Cottage	The Old Laundry Site, High Street and Old Bridge Way, Shefford	10012435946	514,166.00	238,920.00	1.24	Not Permissioned	Not in Public Ownership	60	30	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Front of the site derelict and vacant rear is occupied by B1/B2/B8 uses.
CB/16/02732/BRWN	ALP469/NLP429	Henlow Greyhound Stadium	Henlow Greyhound Stadium, Bedford Road, Lower Stondon, SG16 6EA	100081251535	516,231.00	235,850.00	2.85	Not Permissioned	Not in Public Ownership	53-75	53	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Greyhound racing stadium - commercial and leisure. Adjacent to Henlow Airfield and Lower Stondon.
CB/16/02736/BRWN	ALP255	The Orchard	The Orchard, Bedford Road, Houghton Regis, Dunstable, LU5	100081195666	501,115.00	225,229.00	0.85	Not Permissioned	Not in Public Ownership	20-30	20	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Dwelling with residential garden and land with lawful use for vehicle and materials storage for B8 use. Subsumed within HRN development. Outline registered for 21 dwellings
CB/16/02739/BRWN	NLP458	Biggleswade MOT Centre	Biggleswade MOT Centre, Shortmead Street, Biggleswade	100081252622	518,715.00	245,185.00	0.30	Not Permissioned	Not in Public Ownership	9-20	9	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Current employment use and employment area adjacent to residential area. Possible issues with floodplain.
CB/16/02744/BRWN	NLP097	The Limes	The Limes, 85 High Street, Henlow, SG16 6AB	100081001386	517,645.25	238,570.00	0.36	Not Permissioned	Not in Public Ownership	11-15	11	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Site currently used as a residential care home.
CB/16/02745/BRWN	NLP024	The Bungalow	The Bungalow, Bedford Road, Houghton Regis, Dunstable, LU5 6JS	100081195659	501,256.50	224,615.30	1.07	Not Permissioned	Not in Public Ownership	20-25	20	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Garden land outside built up area therefore PDL. Land subsumed by HRN2 therefore appropriate for housing.
CB/16/02754/BRWN	NLP456	Spinney Park Industrial Estate	Spinney Park Industrial Estate, Billington Road, Leighton Buzzard, LU7 9HH	10001021915	492,690.00	223,819.00	2.46	Not Permissioned	Not in Public Ownership	30-40	44	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Existing employment uses which are adjacent to residential development area.
CB/16/02756/BRWN	NLP096	Meppershall Nursing Home	New Meppershall Nursing Home, Shefford Road, Meppershall, SG17 5LL	100081251812	514,354.77	237,373.63	1.10	Not Permissioned	Not in Public Ownership	30-40	34	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Existing care home in operation adjacent to the village boundary. Narrow site access may be an issue.
CB/16/02760/BRWN	NLP109	Taymer House	Tranquilla, Barton Road, Silsoe, Bedford, MK45 4QP	100080999345	508,129.20	234,638.70	0.99	Not Permissioned	Not in Public Ownership	20-50	24	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Site occupied by existing residence and garden - PDL on the basis of Dartford case.
CB/16/02763/BRWN	NLP115	Motorola Ltd	Land off Taylors Road, Stotfold	100081257257	521,898.00	237,765.00	0.89	Not Permissioned	Not in Public Ownership	35	21	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Existing industrial units current businesses winding down and site is deliverable within next 5 years. Adjacent to new residential area.
CB/16/02767/BRWN	CB/16/05134/FULL	Former Trico Site	Former Trico Site, High Street North, Dunstable	10002277686	500,861.04	222,764.76	1.19	Not Permissioned	Not in Public Ownership	60-70	28	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Site very overgrown - suitable for housing. Full Planning Permission pending CB16/05134/FULL
CB/16/02769/BRWN	CB/15/03052/RM	Dukeminster Estate	Former Dukeminster Estate, Church Street, Dunstable	100081337836	502,331.08	222,150.44	5.04	Permissioned	Not in Public Ownership	170	170	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Site benefits from planning permission for 170 houses
CB/16/02770/BRWN	NLP310	Millstream Works	Millstream Works, Mill Road, Leighton Buzzard, LU7 1BA	100081197375	491,800.00	225,600.00	3.67	Not Permissioned	Not in Public Ownership	66-180	66	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Existing industrial building for Pledge Office Chairs. Part of the site is within the indicative floodplain and mitigation may be required.
CB/16/02794/BRWN	CB/15/02821/OUT	Eastern Avenue Industrial Estate	Former Interbrew, Eastern Avenue Industrial Estate, Eastern Avenue, Dunstable	10014620316	502,957.34	221,875.00	3.19	Permissioned	Not in Public Ownership	100	100	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Outline Planning Permission for 100 dwellings.
CB/16/03020/BRWN	CB/15/04836/FULL	Roker Park	Roker Park, The Green, Stotfold, Hitchin, SG5 4DG	100081310660	521,958.40	237,427.80	1.39	Permissioned	Public Ownership	43	43	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Site benefits from extant planning permission for 43 dwellings
CB/16/03103/BRWN	HA29	Peckworth Industrial Estate	Peckworth Industrial Estate, Bedford Road, Lower Stondon	10012431815	516,439.91	235,611.15	0.38	Not Permissioned	Not in Public Ownership	13	13	http://opendatacommunities.org/doc/unitary-authority/central-bedfordshire	Central Bedfordshire Council	18/07/2016	05/05/2017	Site allocation HA29 North Site Allocation DPD. No planning application to date.



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