

# **Local Plan Regulation 18 Representations: Luton Luton Local Plan Review – Issues and Options Consultation.**

**Land at Stockingstone Road, Luton, Bedfordshire.**

**Representations on behalf of Co-Op Group.**

Date: February 2025 | Pegasus Ref: P24-3089

Author: Chris Marsh

---



## Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
R001v1	January 2025	CM/HE	-	-
R001v2	January 2025	CM/HE	-	Client Issue
R001v3	February 2025	CM/HE	CE	Final Draft
R001v4	February 2025	CM/HE	CE/LR	Final



# Contents.

1. Introduction.....	1
2. Background.....	3
3. Representations on the Local Plan Review.....	5
4. Land at Stockingstone Road.....	11
5. Conclusions .....	17

# 1. Introduction

- 1.1. These representations are prepared by Pegasus Group on behalf of Co-Op Group (hereafter referred to as 'The Co-Op'), in response to the Issues and Options (Regulation 18) consultation for the Luton Local Plan Review, and the longer-term development strategy and needs for the authority area, which will inform the Local Plan through the period to 2045.
- 1.2. The Co-Op own and control the site known as Land at Stockingstone Road, Luton, as shown in Figure 1 below. The site is currently allocated for residential development within the adopted Local Plan, with an indicative capacity of 56no. dwellings. The site area totals 2.2 hectares and is currently occupied in part by an indoor bowls club, situated in the northern part of the site, and a sports and social club positioned to the southwest of this.



Figure 1: Site Location



- 1.3. Access is obtained directly via a simple priority junction with Stockingstone Road, to the South, which enables two-way traffic to reach the central car parking area on site. The prevailing character of the local area is residential dwellings dating from the first half of the C20<sup>th</sup>, and notably the buildings on site maintain a vegetated buffer to neighbouring homes to the North and North-East. The site also benefits from a limb extending between residential properties to Northview Road, to the East, currently secured by dual gates.
- 1.4. The Co-Op welcome this opportunity to engage with the Council and are keen to work collaboratively to ensure that a sound and robust plan is submitted for examination which provides an appropriate planning framework for the authority area.
- 1.5. These representations should be read alongside the submitted Call for Sites form, with this consultation exercise running in parallel with the current Regulation 18 consultation.
- 1.6. These representations have had regard to the published Issues and Options consultation documents, accompanying documentation forming the current evidence base including the Sustainability Appraisal, and the national planning context. Whilst the latest iteration of the National Planning Policy Framework (NPPF) was published in December 2024, this coincided with the publication of the Regulation 18 papers and so it is understood that the current consultation was prepared against the previous iteration of the NPPF, published in December 2023. These representations refer to the latest version, as it will be taken into consideration during the next stage of the plan-making process.
- 1.7. The tests of soundness that Development Plans need to meet so as to be legally compliant and found sound are set out in Paragraph 36 of the NPPF:
  - **a) Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - **b) Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - **c) Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - **d) Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant
- 1.8. These representations refer directly to the specific questions set out in the consultation material and also respond to and comment on the evidence base and other relevant documents where appropriate.
- 1.9. The representations are submitted via email to the Policy Team as per the procedure set out by the Council.

## 2. Background

- 2.1. Luton Council adopted the current Luton Local Plan, covering the period 2011–2031, in November 2017 and this forms the primary consideration in decision-making in accordance with the provisions of s.38(6) of the Planning and Compulsory Purchase Act 2004.
- 2.2. The adopted Local Plan makes provision, *inter alia*, for a housing requirement of 8,500no. new homes over the plan period, reflecting the outputs of the Strategic Housing Land Availability Assessment (SHLAA) (2014) together with the assessed capacity of the authority area to meet the objectively assessed need, which points to a considerable level of unmet need that itself exceeds the level of growth planned. Within the wider Luton Housing Market Area an overall need of 31,800 dwellings was identified, highlighting the pressure for new homes in the area.
- 2.3. Paragraph 34 of the NPPF stipulates that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy.
- 2.4. This reflects Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which requires local planning authorities to review local plans at least once every five years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.
- 2.5. Crucially, Paragraph 34 also states that relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.
- 2.6. Luton Council rightly recognise that as the adopted Local Plan is more than seven years old, and that during that time considerable changes have occurred demographically, economically and in terms of national planning policy and other issues, such that it is important to progress a new local plan as a matter of priority. The current consultation and Call for Sites represents an early stage in plan preparation, during which high level strategic policies including the level of growth to be planned for, may be examined fully.
- 2.7. The Council's latest Local Development Scheme (LDS), published in July 2024, indicates that evidence-gathering for a new Local Plan commenced in September 2023, leading to the current Regulation 18 consultation in early 2025 and an anticipated further Regulation 18 Options and draft Plan consultation in March to April 2026. Regulation 19 consultation on detailed policies is currently scheduled for June to July 2027 with a view to formal submission in January 2028. The LDS anticipates examination to proceed to enable adoption of the plan around November 2028.
- 2.8. The current allocation for Land at Stockingstone Road, as set out at Appendix 4 of the plan indicates a capacity for c.56 dwellings and contains the following footnote in respect of the re-provision of existing recreational facilities on the site:



*“Land at Stockingstone Road- The indoor bowls facility, outdoor bowls facility and ancillary parking provision should be retained or replaced within the allocation site with equivalent or better provision in terms of quantity and quality as part of the redevelopment of the site. Alternatively, these facilities would need to be replaced off-site with equivalent or better provision in terms of quantity and quality in a suitable location capable of serving existing users. Provision will need to be made for the bowls clubs to be given acceptable security of use and for any replacement facility to be completed and operational prior to the development of new housing commencing on the site.”*

- 2.9. The current development plan therefore recognises the site as a sustainable brownfield location for residential redevelopment, with appropriate provisions being made for *either* retention in situ, replacement on site or relocation elsewhere of the bowls facilities due to their recreational value to existing users.

### 3. Representations on the Local Plan Review

#### Introduction

- 3.1. This section sets out our representations in response to the consultation on the emerging Local Plan, with particular reference to the importance of meeting housing needs in Luton. Given that the site at Stockingstone Road is already allocated for residential development and has the potential to contribute positively to housing delivery, it is crucial that the plan ensures the most efficient use of land to optimise housing provision in sustainable locations.
- 3.2. Our representations focus on the importance of aligning housing targets with the latest standard method calculations and ensuring that land is used effectively to meet identified needs.

#### Developing Vision and Objectives

- 3.3. Presently, the consultation Local Plan outlines a plan period to 2045, equating to 17 years if adopted according to the November 2028 date specified in the LDS. Paragraph 22 of the NPPF directs that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.
- 3.4. Notwithstanding the potential for a bottleneck in local plan examination nationwide, given that the transitional provisions of national policy changes has created an increase in plans being submitted to the Secretary of State, the timescales set out in the LDS do not appear unrealistic subject to the timely publication of the second Regulation 18 plan following review of the evidence base. On this basis, the anticipated plan period would meet the minimum expectations of the NPPF with a suitable contingency for a slight overrun.
- 3.5. While the Plan Period set out in the LDS meets the minimum expectations of the NPPF, it is important that the Council progresses the plan in a timely manner. Given the scale of unmet housing need in Luton and the surrounding area, any delays in the adoption of the Local Plan could have significant consequences for housing delivery and affordability. It is therefore essential that the Council maintains momentum in its evidence gathering and plan preparation to avoid unnecessary delays in meeting identified needs.

#### Housing Requirement

- 3.6. The emerging Local Plan must be based on the most up-to-date evidence of housing need, which includes the latest Standard Method calculations. As of December 2024, the Standard Method sets Luton's minimum annual housing need at 1,082 dwellings per annum, as calculated using the methodology set out in the UK Government's *Housing and Economic Development Needs Assessments* guidance, published as part of the Planning Practice Guidance (PPG) and last updated on 12 December 2024.
- 3.7. Although less than the previous standard method's output of 1,463 dpa, this nonetheless represents a significant increase compared to the adopted Local Plan, which sets a minimum housing requirement of 425 dwellings per annum.

- 3.8. It is essential that the Local Plan seeks to meet this Standard Method figure in full. The NPPF requires plans to be positively prepared, ensuring that local housing needs are addressed in a sustainable manner. Given Luton's persistent undersupply of housing and the affordability pressures in the borough, any failure to plan for at least the Standard Method figure would undermine the soundness of the Local Plan.
- 3.9. Failure to meet the Standard Method figure in full also risks non-compliance with Paragraph 61 of the NPPF, which requires local planning authorities to assess and meet housing need as a minimum. Additionally, not delivering the required housing will place further pressure on affordability, exacerbating issues of overcrowding and housing inequality in Luton.
- 3.10. To maximise delivery, the plan must therefore focus on making efficient use of land in appropriate locations. This includes optimising density on suitable sites, particularly on previously developed (brownfield) land, ensuring that as much of the identified housing need as possible is accommodated.
- 3.11. The Co-op's site at Stockingstone Road is an example of a sustainable, allocated site that can contribute to meeting Luton's housing needs while maintaining an appropriate urban form. Prioritising brownfield land aligns with Paragraph 119 of the NPPF, which also directs local plans to make the most efficient use of land while safeguarding the environment. The Local Plan should set out clear density expectations for sustainable sites to ensure efficient land use, particularly in constrained areas such as Luton.
- 3.12. While the consultation document acknowledges the challenges of housing delivery in Luton, it does not place sufficient emphasis on the practical steps needed to ensure the Standard Method housing requirement of 1,463 dwellings per annum is met. Given Luton's constrained land supply, the Local Plan should clearly prioritise higher-density development in sustainable locations, particularly on allocated brownfield sites such as Stockingstone Road.
- 3.13. Additionally, stronger cross-boundary cooperation mechanisms must be established to address any unmet need, ensuring a deliverable and sound housing strategy that aligns with national policy.

#### **Duty to Cooperate**

- 3.14. The Duty to Cooperate is particularly important in the context of Luton's housing challenges, given the borough's constrained land supply and reliance on cross-boundary collaboration to address unmet need. Ensuring effective engagement with neighbouring authorities is essential to delivering a sound Local Plan. Failure to engage effectively under the Duty to Cooperate has led to Local Plans being found unsound at examination, as seen in cases such as St Albans and Wealden. A legally robust plan must demonstrate clear evidence of collaboration with neighbouring authorities, including agreed Statements of Common Ground, to address Luton's unmet need.
- 3.15. The Standard Method output (1,082 dwellings per annum) highlights the significant scale of housing need in Luton. The emerging Local Plan must set out a clear strategy for addressing Luton's housing needs, including maximising housing delivery within the borough by ensuring the efficient use of land, particularly previously developed sites in sustainable locations, formalising agreements with neighbouring authorities to accommodate any unmet need, ensuring a joined-up, strategic approach to housing delivery across the wider area.

- 3.16. Moreover, alignment with national policy requirements, to minimise the risk of the Local Plan being deemed unsound at examination, is critical.
- 3.17. Failure to engage meaningfully with neighbouring authorities and establish a clear, deliverable strategy for meeting housing needs risks undermining the soundness of the Local Plan. Given the scale of demand and the borough's constraints, a proactive and evidence-based approach to cross-boundary cooperation is essential. By prioritising the efficient use of land within Luton and securing robust agreements for accommodating unmet need, the Local Plan can ensure a sustainable and legally compliant framework for future growth.

### **Public Open Space and Green Infrastructure**

- 3.18. The emerging Local Plan must ensure that public open space provision is enhanced and protected, particularly in areas experiencing housing growth. Well-designed open spaces contribute to health and wellbeing, biodiversity, and climate resilience, aligning with national and local policy objectives. In addition to recreational benefits, well-designed open spaces contribute to climate resilience by managing surface water runoff through Sustainable Drainage Systems (SuDS). The Local Plan should encourage tree planting, permeable surfaces, and biodiversity corridors to maximise these benefits.
- 3.19. The Local Plan should set clear standards for open space provision within new developments, ensuring they are high quality, multifunctional, and accessible. This includes integrating green corridors, urban greening measures, and enhancements to existing recreational areas. At Stockingstone Road, any future redevelopment presents an opportunity to incorporate well-designed public spaces, ensuring that the site contributes positively to the wider green infrastructure network.
- 3.20. The Local Plan must ensure that the provision of public open spaces and green infrastructure keeps pace with housing growth. Access to high-quality open spaces is essential for mental and physical wellbeing, as well as biodiversity and climate resilience.

The Local Plan should:

- Protect existing public open spaces from development and ensure their enhancement where necessary.
  - Encourage the integration of green spaces within new developments, ensuring that they are multi-functional and promote health and wellbeing.
  - Ensure that public open space is accessible and well-connected, improving walking and cycling networks to enhance connectivity between urban and natural environments.
- 3.21. Green space provision should be integrated into wider strategic networks, connecting parks, green corridors, and active travel routes to maximise accessibility. Multifunctional spaces should incorporate play areas, ecological habitats, and areas for informal recreation to support diverse community needs.
- 3.22. At Stockingstone Road, any future development will incorporate well-designed public space, ensuring that new residents have access to high-quality outdoor environments. This aligns with national planning policies promoting health, wellbeing, and sustainability.



### Alignment with Building Regulations and Sustainable Design

- 3.23. The Regulation 18 consultation outlines broad themes around sustainable development, including ambitions for net zero carbon and improving the environmental performance of new development. While these objectives are supported in principle, it is essential that any future policies ensure viability, deliverability, and alignment with national planning and building regulations.
- 3.24. It is important that new development within Luton aligns with national Building Regulations, particularly in relation to energy efficiency, accessibility, and sustainability. Compliance with Part L (energy efficiency), Part M (accessibility), and Part O (overheating mitigation), which set out the Government's expectations in meeting the essential need for future-proofing new housing and ensuring it remains resilient to climate change.
- 3.25. Whilst The Co-Op agrees with the need and desire to improve energy efficiency and carbon use it remains unclear why this should be done outside of the Building Regulations. There is no clear rationale that Luton should be a 'special case' in this regard.
- 3.26. The Co-Op acknowledges that Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 outlines that development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.
- 3.27. Similarly, the NPPF identifies plans should take a proactive approach to mitigating and adapting to climate change. However, the PPG (ID 6-012-20190315) refers to the Planning and Energy Act 2008, the Deregulation Act 2015, and the Written Ministerial Statement (March 2015) and states that policies in relation to energy performance standards should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes.
- 3.28. Part L of Building Regulations, as updated in 2021, identifies a requirement to achieve a 31% reduction in carbon emissions for new dwellings. Current Building Regulations, which took effect on 15 June 2022, therefore exceed Level 4 of the Code for Sustainable Homes. This therefore means any policy seeking to set even higher standards not enshrined in existing Regulations would directly conflict with both the PPG and the 2015 Ministerial Statement.
- 3.29. Even if ignoring the above it can be observed that the Government's last response to the Future Homes Standard (FHS) consultation suggested that any policy should not be prescriptive on methodology and technology and that until there is an upgrade to the grid developers only need to demonstrate dwellings are Zero Carbon enabled. This was further advanced by the recent Written Ministerial Statement, by the former Housing Minister Lee Rowley on 13th December 2023 (HLWS120), by making clear the Government's expectations following the uplifts in the Building Regulations:

*"The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings*



*regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:*

*That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*

*The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP)."*

- 3.30. The industry is, therefore, moving towards zero-carbon housing as standard, but the transitional arrangements are in place to ensure that this can be done smoothly. Taking account of this the plan must ensure that it does not place onerous requirements on development which may jeopardise delivery in the short-term.

### **Supporting Sustainable Economic Growth**

- 3.31. The Local Plan must ensure that housing delivery aligns with economic growth strategies to provide sustainable employment opportunities for Luton's growing population. Ensuring that residential development is supported by appropriate infrastructure, transport links, and access to employment hubs is crucial in delivering balanced and inclusive growth.
- 3.32. Luton's economy is driven by key sectors such as aviation, advanced manufacturing, and logistics. The Local Plan should support policies that create synergies between employment hubs and residential areas, ensuring that housing growth aligns with job opportunities and workforce needs.
- 3.33. The Local Plan should promote mixed-use development in sustainable locations, enabling residents to live near employment opportunities and reducing reliance on car travel, while providing the day-to-day practical and recreational facilities they would expect to find in a sustainable settlement with good self-containment such as Luton. Furthermore, strategies for economic growth should include provisions for upskilling the workforce, ensuring that Luton remains a competitive and attractive place for businesses.
- 3.34. Furthermore, food security and access to locally grown produce are increasingly recognised as key components of sustainable planning. Supporting local food production aligns with climate change mitigation strategies, improves community resilience, and contributes to healthy and sustainable living environments. The promotion of urban food production should be considered in the context of food resilience, reducing dependence on external supply chains and enhancing local access to fresh produce. Community food-growing initiatives also support health and well-being, providing educational opportunities and fostering social cohesion.

### **Ensuring Sustainable Infrastructure Delivery**

- 3.35. Sustainable infrastructure delivery is crucial to support **Luton's planned housing growth**. The Local Plan should set out clear priorities for:
- Investment in transport, utilities, and community facilities to accommodate new development.



- A robust strategy for securing developer contributions (e.g., Section 106 and CIL) to ensure new housing does not place undue pressure on existing infrastructure.
  - Integration of digital infrastructure and green energy solutions to enhance resilience and futureproof development.
- 3.36. Without parallel investment in supporting infrastructure, increased housing delivery could lead to congestion, pressure on local services, and strain on utilities. The Local Plan should ensure that infrastructure planning is fully integrated with housing growth to prevent development from outpacing essential service capacity. Futureproofing should include high-speed digital connectivity, decentralised renewable energy networks, and smart infrastructure solutions to create a resilient and adaptive urban environment.
- 3.37. Without a clear infrastructure delivery strategy, there is a risk that new development will not be adequately supported, impacting the sustainability and effectiveness of the Local Plan.

### **Conclusion**

- 3.38. These representations support the delivery of a sound and robust Local Plan that meets Luton's housing and infrastructure needs while promoting sustainable and well-planned growth. Given the borough's constrained land supply and high housing demand, it is imperative that the Local Plan takes a proactive approach to maximising land efficiency, ensuring cross-boundary cooperation, and delivering high-quality development that aligns with national policy requirements.
- 3.39. The Co-Op's site at Stockingstone Road is an allocated, sustainable location that can contribute to Luton's housing targets, while also offering opportunities to enhance public open space and green infrastructure. It represents an example of how previously developed land can be optimised to deliver much-needed homes without encroaching on greenfield land.
- 3.40. To ensure the success and deliverability of the Local Plan, it is critical that housing policies align with the Standard Method calculation, that essential infrastructure is in place to support new development, and that a coherent strategy for employment, sustainability, and placemaking is embedded within the plan. Failure to address these issues comprehensively risks the soundness of the Local Plan at examination.
- 3.41. The transition to zero-carbon-ready homes is already guided by national standards. Future Local Plan policies must align with Building Regulations to ensure viability and deliverability, avoiding unnecessary burdens that could impact housing supply and affordability.

## 4. Land at Stockingstone Road

- 4.1. The Co-Op are promoting the Land at Stockingstone Road, Luton, which is currently identified as a site allocation within the adopted Local Plan, as an appropriate location for new housing under the emerging plan, reflecting its continuing suitability for redevelopment.

### Site Context

- 4.2. The site is 2.2 hectares in size and for the most part regularly proportioned, save for the 'limbs' forming accesses to Stockingstone Road and Northview Road, to the South and East respectively, and is bounded by a mixture of residential gardens and vegetation. The site comprises previously developed land, and is identified on the Brownfield register (SHLAA339) for a range of 56-62 dwellings.
- 4.3. The site is highly accessible to key local services, with many day-to-day facilities available on Stockingstone Road itself, being situated approximately 20 minutes' walking distance (5 mins cycling) from central facilities including Luton Railway Station and with access to bus stops situated immediately beyond the site access on Stockingstone Road at Preston Gardens, providing convenient regular services.
- 4.4. The surrounding area is dominated by residential use, with mature suburban housing on all sides, typically comprising generous plots and uniform two-storey scale. Characteristically, the area has seen relatively little regeneration as its building stock remains in good condition and balanced in terms of the hierarchy and mix of supporting infrastructure and local facilities.

### Site Ownership

- 4.5. Co-Op Group maintain full control over the site, including access points contiguous with the adopted public highway and therefore there are no ownership issues prohibitive to delivery of a comprehensive redevelopment.

### Constraints

- 4.6. As indicated above, the site is situated in an already overwhelmingly residential context, interspersed with local services in a loose-knit manner rather than in the form of a clear high street or local centre, with a greater concentration of services being found at Hitchin Road to the East, within five minutes' walk.
- 4.7. As such, there are no significant noise generating, or noise-sensitive, land uses in the immediate vicinity of the site, which save for its access interfaces universally with the rears of generous domestic gardens.
- 4.8. The site is not subject of any overriding statutory or other practical constraint. It is not covered by any ecological or landscape designation, nor are there any designated heritage assets either within or in the immediate vicinity of the site boundary.
- 4.9. As shown below, the site is located within Flood Zone 1, indicating the lowest risk of flooding.

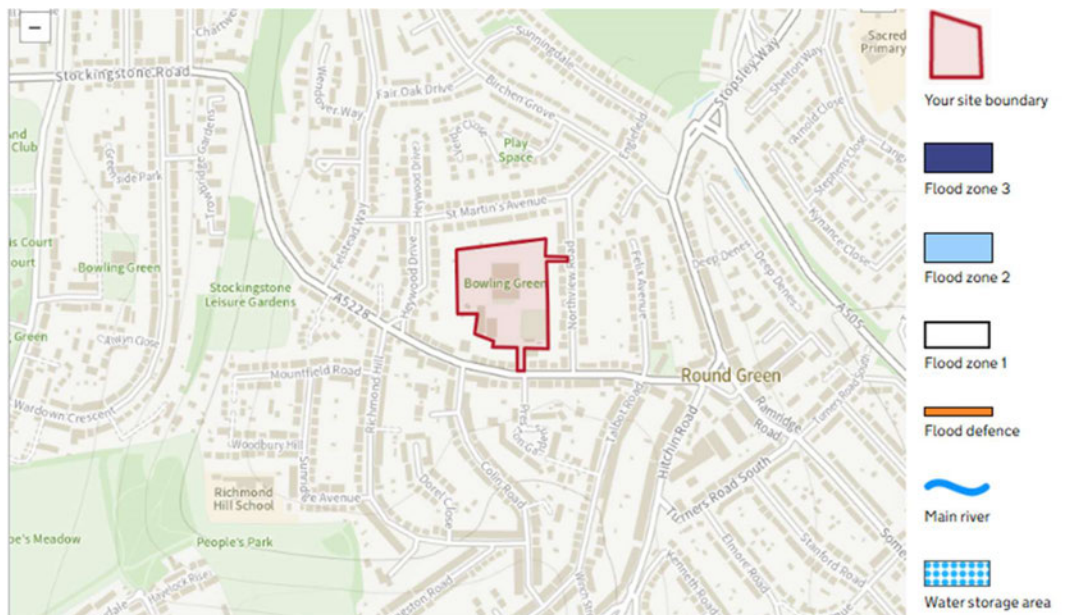


Figure 2: Excerpt from EA Flood Map for Planning

**Policy Context**

4.10. The site is not subject of any specific designations under the adopted Local Plan, as shown in the Proposals Map excerpt below which indicates the site hatched in red to denote the current allocation for mixed use development.

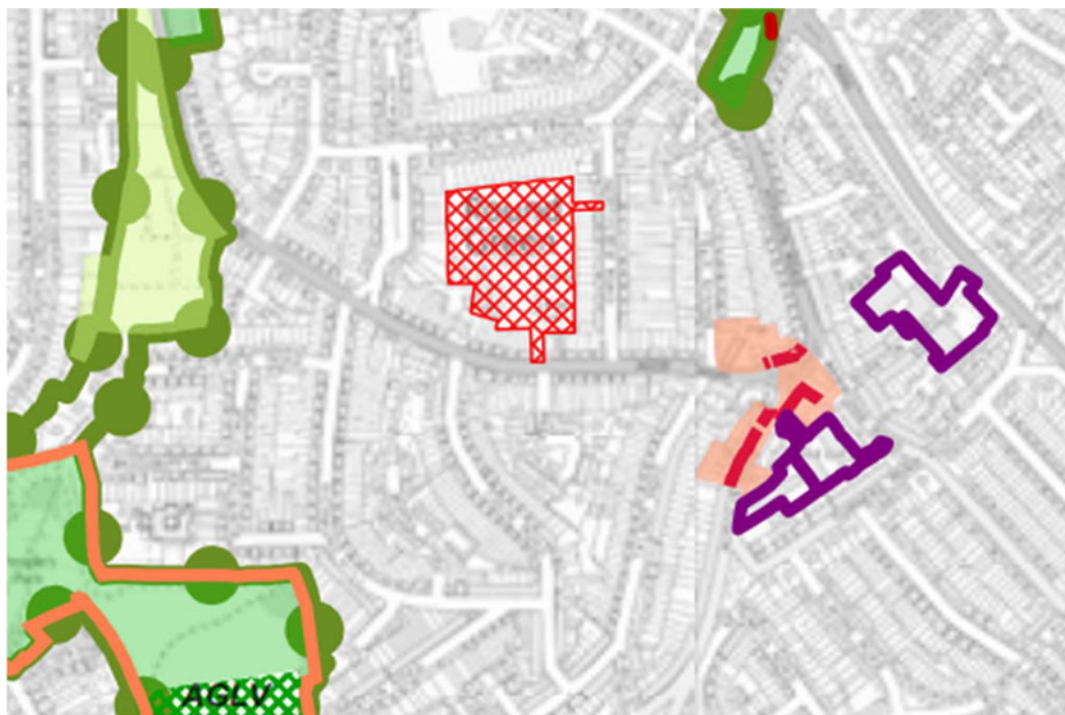


Figure 3: Excerpt from Local Plan Proposals Map

- 4.11. The areas outlined in purple a short distance eastward/southeast denote Category B employment areas, the latter flanking an identified Neighbourhood Centre Boundary and Frontage immediately to its northwest, while the green areas to the northeast and West are both identified areas of local landscape value, and County and District Wildlife Sites respectively. The designation to the southwest is also an area of local landscape value, and CWS and Common Land.
- 4.12. As such, the site is free of any significant planning constraints that would either preclude or otherwise render unduly challenging its delivery either as a mixed use or wholly residential redevelopment opportunity.
- 4.13. The adopted Local Plan allocates the site for mixed use development under policy LLP15 (Housing Provision), which provides *inter alia* that planning permission will be granted for residential development and mixed-use schemes on allocated sites in line with Appendix 4 of the Plan, essentially on the presumption that redevelopment *may* entail the on-site retention/reprovision of the existing recreational facilities.
- 4.14. The policy at Appendix 4 of the Plan anticipates a capacity of 56no. dwellings, although this is not qualified as to whether this does or does not include the retention or reprovision of the bowls club on site. In any event, this is a guide and not a prescriptive policy requirement that the site should provide neither more nor fewer homes than this.

#### **Replacement/Relocation of Recreational Facilities**

- 4.15. The footnote to the current site allocation specifies that redevelopment of the site must include either reprovision within the site or total relocation of the recreational facilities of the indoor and outdoor bowls provision and their associated parking to a suitable alternative location.
- 4.16. This embodies a sensible, pragmatic and proportionate degree of flexibility, recognising that better economy may be achieved by relocation and the complexities of redeveloping a brownfield site, but also the compatibility of these existing uses within a primarily residential context. The footnote does not set any requirement for the retention or reprovision of the sports and social club either within the site or elsewhere.

#### **Redevelopment Potential**

- 4.17. Although the site has not been subject of any planning applications for residential/mixed use redevelopment, a pre-application enquiry was submitted in 2022 presenting a provisional scheme of 75no. homes comprising a mixture of 28no. apartments and 47no. medium-sized dwellings, together with the retention and refurbishment of the indoor bowls facilities and retention of the outdoor green and associated parking in situ.
- 4.18. An excerpt from the submitted proposed layout plan is shown below.



**Figure 4: Excerpt of Pre-App Proposed Plan**

- 4.19. The proposals demonstrated how redevelopment could be appropriately accommodated while reflecting the requirements of the footnote to the allocation at Appendix 4 of the plan, so that the indoor and outdoor bowls facilities would be both retained on site and indeed enhanced with the reconfiguration of the clubhouse to accommodate a more multifunctional space, increasing the capacity of the club to raise revenue through events and thus improve its long term viability.
- 4.20. As shown, the site is comfortably able to accommodate in excess of the indicative capacity of 56no. dwellings, in a manner comprising mainly family dwellings in recognition of both the site's immediate context and the Council's identified concerns in respect of the disparity between the SHMA's identified needs and the market's predominant delivery of smaller flats in practice. This was received positively by the Council's housing officers on the basis that the development would provide 15no. affordable homes.
- 4.21. The indicative scheme also shows how all properties would be provided with allocated off-street parking, and that all new dwellings would benefit from sufficient, private and secure outdoor amenity space. The layout also made effective use of the breakthrough from Northview Road by detailing an infill dwelling to complete the eastern street frontage.
- 4.22. Under the draft proposals, access would be taken from the existing junction with Stockingstone Road, providing a single point capable of affording two-way vehicle movements and suitability visibility in both directions via an established arrangement. On review of the proposals, local highway officers were satisfied in principle that this is an appropriate approach, subject to suitable minor realignment works.

- 4.23. Overall, officers appear to have been comfortable with the quantum and mix of development overall, and supportive of the retention and refurbishment of the bowls facilities in situ. A number of design and amenity considerations were raised as regards the configuration of units within the site, albeit accepting that no adverse impacts on existing neighbouring dwellings would be anticipated.
- 4.24. In summary, it is clear that the site has considerable scope for residential-led redevelopment and that even accounting for the retention of the bowls facilities as required by the footnote to Appendix 4/LLP16 the site is readily capable of accommodating well in excess of the cautious quantum of development indicated under the adopted Local Plan without recourse to an unfavourably high proportion of flats/smaller units.
- 4.25. As such, under an emerging site allocation, the site capacity should be expressed in terms of an ability to deliver at least 75no. homes if retaining the existing bowls provision, with a suitable alternative uplift figure (estimated at 100–120 no. homes) should an appropriate relocation site for the recreational facilities be identified under future redevelopment proposals.

#### **Delivery**

- 4.26. The site would provide a sustainable re-use of urban previously developed land to provide much needed new homes, including the provision of affordable homes. Notably, if this were to entail the retention of the bowls facilities in situ, this could take place immediately upon the grant of planning permission and discharge of any pre-commencement conditions, without awaiting relocation of the recreational uses; any refurbishment incorporated into the scheme would be a betterment, but would not compromise the like-for-like availability of the facilities and thus would not need to be carried ahead of the residential component.
- 4.27. Paragraph 73 of the Framework stresses, *inter alia*, that “*Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly.*” The site in question is undoubtedly at such a scale and given its relatively unconstrained nature could be delivered quickly by an appropriate partner, thus contributing housing supply well within a five-year horizon and providing homes needed locally in the immediate future.

#### **Summary**

- 4.28. The site is an optimal and highly sustainable location for residential redevelopment, within central part of Luton where intensification should be focused. Given that it is well-contained and already sitting within a residential context, as supported by its current allocation under LLP15, it is a logical location for redevelopment, as has been acknowledged by the Council.
- 4.29. The site has the ability to provide landscaping and ecological enhancements together with a high standard of design to ensure its successful integration in the surrounding area while achieving environmental betterments. Further technical work will be undertaken to shape the design and layout of a final proposed redevelopment.



- 4.30. The site sits under one ownership and is **available, achievable** and **deliverable** in the short to medium term, to meet the need for housing, including affordable homes, within the authority area.
  
- 4.31. Alongside these representations, the site has been submitted to the Council for consideration as part of its Call for Sites exercise.

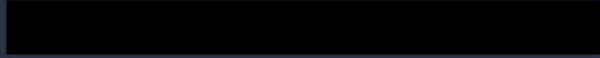


## 5. Conclusions

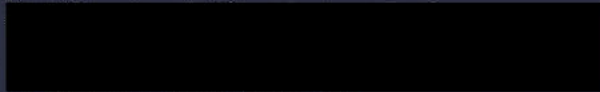
- 5.1. These representations have been prepared by Pegasus Group on behalf of Co-Op Group, who have land interests at the site known as Land at Stockingstone Road, Luton. This land, as allocated under the adopted Local Plan, is being promoted for residential-led development.
- 5.2. The Co-op are keen to work with Luton Council to ensure that it prepares a pre-submission plan for examination to the Secretary of State which is sound and robust.
- 5.3. The Co-Op have concerns in relation to the following elements of the emerging Regulation 18 Local Plan as follows:
  - **Risk of under-providing against the authority's housing needs** as calculated against the updated standard method;
  - **Risk of failing to meet the need for affordable homes** and exacerbating affordability through overall under-supply;
  - **Prospect of setting energy efficiency requirements above the Building Regulations**, with consequent difficulties for viability, deliverability and affordability;
  - **Risk of under-delivering strategic infrastructure** sufficient to support the level of housing growth required and undermining Luton's self-containment and ability to attract jobs.
- 5.4. Notwithstanding, in the context of continuing pressure for additional housing and given the wider constraints of the area surrounding Luton, and indeed component areas within the town, The Co-Op recognise the critical importance of bringing forward appropriately located, previously developed land at the highest possible efficiency to provide suitable new homes locally. The site is optimally placed to do so and must be re-allocated in this context.
- 5.5. Throughout these representations, we have identified how the above issues can be addressed to ensure that a sound pre-submission plan is prepared which is capable of meeting the needs of the district.
- 5.6. The Co-Op welcome the opportunity to continue to comment upon both the Local Plan Regulation 18 consultation and the longer-term development strategy and requirements for the authority area. If the Council requires any further information in respect of the site at Land at Stockingstone Road to assist in accurately assessing it, this can be provided upon request.



Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004



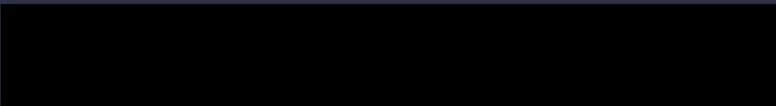
**Bristol**



E Bristol@pegasusgroup.co.uk  
Offices throughout the UK.

**Expertly Done.**

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE



    
Pegasus\_Group pegasusgroup Pegasus\_Group

**PEGASUSGROUP.CO.UK**