

NEW LOCAL PLAN CALL FOR SITES

(MAY 2026)

1 – 5 Dudley Street, Luton, Bedfordshire, LU2 0NP

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On behalf of:
Osprey London

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GRAHAM + SIBBALD

Contents

1-5 Dudley Street, Luton, Bedfordshire, Luton	1
1.00 Introduction	3
2.00 The Site and Surrounding Area	4
3.00 Relevant Planning History	6
4.00 Proposed Development	7
5.00 Planning Policy Framework	7
6.00 Case for Allocation	8
7.00 Conclusion	12

1.00 Introduction

- 1.01 This representation has been prepared in response to Luton Borough Council's Call for Sites consultation (May 2026) as part of the preparation of the emerging Local Plan.
- 1.02 The representation is submitted on behalf of Osprey London, the freehold owner of 1-5 Dudley Street, Luton, LU2 0NP ("the Site").
- 1.03 The Site comprises a former factory with associated office accommodation located within the Central Area of Luton, adjacent to the railway station. The property has been vacant for over five years and provides an important brownfield redevelopment opportunity in a highly sustainable location. The premises are no longer suitable for modern industrial or manufacturing operations due to its ageing multi-storey configuration, low floor-to-ceiling heights, constrained servicing arrangements and limited parking provision. The property has been actively marketed since 2021 without generating any serious interest. This demonstrates a clear lack of market demand for industrial or commercial uses and highlights the need for an alternative use that can secure the long-term reuse of this former factory building.
- 1.04 The Site could be converted or redeveloped to deliver a high-quality residential scheme of approximately 30 dwellings. It may also be suitable for other accommodation-based uses, including specialist housing for older persons, student accommodation and hotel use, given its sustainable central location.
- 1.05 The Site is therefore promoted for a residential-led allocation with flexibility to accommodate specialist housing, student accommodation, hotel use and other appropriate town centre compatible uses where these would support the regeneration of the Site. A flexible allocation would maximise the prospects of bringing this long-term vacant building back into active use by allowing development to respond to changing market conditions and demand over the plan period. This approach would improve deliverability and better support the Council's wider regeneration objectives.
- 1.06 The property is vacant and available immediately for redevelopment and could therefore be delivered within the first five years of the plan period, making an early and meaningful contribution to the Council's housing supply targets.
- 1.07 This Statement demonstrates why the allocation of the Site for residential development, alongside other suitable uses such as specialist housing, student accommodation and hotel use, would represent a sustainable and desirable planning outcome. Further supporting information can be provided to expand upon the matters raised within this representation.

2.00 Site Description and Surroundings

Application Site

- 2.01 The Site is located on the western side of Dudley Street, close to its junction with Midland Road, within the Central Area of Luton. It is in a highly sustainable area adjacent to Luton Railway Station and within easy walking distance of the town centre, local services, employment opportunities and public transport networks.



Approximate extent of the Site outlined in red

- 2.02 The Site comprises a former factory with associated office accommodation that has been vacant for over five years. The building is formed in two main parts, namely 1 Dudley Street to the south and 3-5 Dudley Street to the north. Both buildings are three storeys in height with basement accommodation and previously operated as part of a single manufacturing complex. The Site has a long association with Luton's historic hat making industry, although it has been extensively altered over time to accommodate changing operational requirements.
- 2.03 The building at 1 Dudley Street retains its original early 20th-century façade. The adjoining building at 3-5 Dudley Street has been substantially altered and has a modern metal-clad frontage of limited architectural merit. The building footprint extends across almost the entire Site.
- 2.04 The Site has a former loading bay and servicing access from Dudley Street; however, there is no dedicated on-site parking provision. The servicing arrangements are constrained and are not well suited to modern commercial or industrial occupiers, particularly those requiring access for larger vehicles. Together with the building's multi-storey configuration, low floor-to-ceiling heights and limited flexibility, these factors have contributed to the building no longer meeting the requirements of modern industrial or commercial operations.



Streetview of the Site and adjoining development

Surroundings

- 2.05 The surrounding area is characterised by a mix of residential, commercial and town centre uses. A number of former industrial and commercial buildings have been successfully redeveloped for residential purposes in recent years, including Hatton Place and Plait Court.

Designations

- 2.06 The Site forms part of the High Town Strategic Allocation. The building is not statutorily listed and is not included on the Council's adopted Local List. The Site is not located within a Conservation Area and is therefore not subject to any statutory heritage designations.
- 2.07 The Site is located within Flood Zone 1 and is not identified as being at risk of surface water flooding. As such, flood risk is not considered a constraint to future development.

3.00 Relevant Planning History

Application Site

Pre-application requested for residential redevelopment (REAPP/21/00131/CAP)

- 3.01 A pre-application request was submitted to the Council for the demolition of the existing buildings (retaining the principal façade of No. 1 Dudley Street) and the erection of a 7-storey building with basement accommodation providing 36 flats (16 one-bedroom, 13 two-bedroom, 5 three-bedroom and 2 four-bedroom dwellings).
- 3.02 The Council's response, dated 9 November 2021, confirmed that the principle of residential redevelopment was acceptable. Importantly, the Council acknowledged that the site constituted an unidentified employment site and accepted the evidence submitted demonstrating that there was no realistic prospect of the premises continuing in employment use, having regard to the extensive marketing undertaken and the building's functional limitations. The Council concluded that the loss of employment floorspace would not result in the loss of a use for which there is a recognised local need and that residential redevelopment would be consistent with the objectives of the development plan.
- 3.03 The Council further confirmed that there were no concerns with the site being redeveloped without the provision of replacement employment floorspace, recognising that the proposal would deliver much-needed housing within a highly sustainable town centre location. The Council also considered that residential-led redevelopment accords broadly with the aspirations of Policy LLP10 (High Town), which seeks to facilitate regeneration and new housing delivery within the area.
- 3.04 While the pre-application response identified a number of detailed design, amenity and environmental matters requiring further consideration, no in principle objection was raised to the residential redevelopment of the site. The Council concluded that it would be supportive of a residential scheme, subject to addressing the detailed matters in any subsequent planning application.

Prior approval for change of use (19/00967COM)

- 3.05 Prior approval was sought under Part 3, Class O of the Town and Country Planning (General Permitted Development) (England) Order 2015 for the change of use of the upper two floors of the building from offices (Use Class B1(a)) to 11 residential flats (Use Class C3). The application was refused on 11 September 2019 on the basis that the building was not considered to be solely in office use and therefore did not benefit from the permitted development rights afforded under Class O. The refusal related to the specific requirements of the prior approval process and did not establish any in principle objection to residential use of the site.

Mixed use development (05/01669)

- 3.06 An application for conversion of existing building and erection of two further floor levels and rear extension to create offices and 14 flats was approved 02 February 2006. This permission was not implemented.

4.00 Proposed Development

- 4.01 The Site is promoted for a residential allocation with sufficient flexibility to accommodate other appropriate accommodation based uses.
- 4.02 The Site could accommodate approximately 30 dwellings through the conversion, redevelopment or partial retention and redevelopment of the existing buildings, depending on detailed design, heritage and technical considerations. Development is anticipated to comprise a medium to high-density form of development that reflects the Site's sustainable town centre location and excellent accessibility to public transport, services, employment opportunities and community facilities.
- 4.03 In addition to market and affordable housing (Use Class C3), the Site is considered suitable for a range of other uses, including specialist housing for older persons, students, build-to-rent or a hotel. The Site's highly sustainable location, on the edge of the town centre and adjacent to Luton Railway Station, makes it particularly suitable for these uses.
- 4.04 The proposed allocation should provide flexibility to accommodate a range of residential development types and other compatible town centre uses, allowing the Site to respond to changing market conditions and development opportunities over the plan period.
- 4.05 Any future development would seek to deliver a high-quality scheme that makes efficient use of this previously developed site, respects the character of the surrounding area and contributes positively to the ongoing regeneration of High Town.

5.00 Planning Policy Framework

National Planning Policy Framework (2024)

- 5.01 Central Government advice relevant to this representation is contained within the National Planning Policy Framework (NPPF). The NPPF establishes a presumption in favour of sustainable development and confirms that the planning system should contribute to the achievement of sustainable development through economic, social and environmental objectives.
- 5.02 Paragraph 8 of the NPPF identifies three overarching objectives to sustainable development. The economic objective seeks to help build a strong, responsive and competitive economy. The social objective supports strong, vibrant and healthy communities through the provision of homes and the creation of accessible services and infrastructure. The environmental objective seeks to protect and enhance the natural, built and historic environment whilst making effective use of land.
- 5.03 Section 5 'Delivering a Sufficient Supply of Homes', confirms the Government's objective of significantly boosting the supply of homes. Paragraph 61 states that it is important that a sufficient amount and variety of land can come forward where and when needed to support the Government's housing objectives.

- 5.04 Paragraph 73 recognises that small and medium-sized sites can make an important contribution towards meeting housing requirements and are often developed more quickly than larger strategic allocations. The Site has the potential to make an early contribution towards housing delivery within the Borough.
- 5.05 Section 7 'Ensuring the Vitality of Town Centres', supports the regeneration and diversification of town centres and encourages a positive approach towards development that contributes to their vitality and viability. The Site occupies a sustainable location on the edge of Luton Town Centre and its redevelopment would support the continued regeneration of this part of the town.
- 5.06 Section 8 'Promoting Healthy and Safe Communities', recognises the importance of planning in supporting education and enabling communities to meet their social and economic needs. Given the Site's proximity to the University of Bedfordshire, it is ideally located to provide student accommodation or other uses that support the town's important education sector.
- 5.07 Section 9 'Promoting Sustainable Transport' seeks to ensure that significant development is focused on locations that are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes. The Site is located adjacent to Luton Railway Station and within walking distance of the town centre, employment opportunities, educational facilities and a wide range of services. As such, it is a highly sustainable location for new development.
- 5.08 Section 11, 'Making Effective Use of Land', is relevant to the promotion of the Site. Paragraph 125 confirms that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs. The Site comprises previously developed land within the urban area and represents an opportunity to bring a long-term vacant building back into productive use.
- 5.09 Section 12 'Achieving well-designed places', at paragraph 131 states that creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. It notes that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

6.00 Case for Allocation

Sustainable Brownfield Redevelopment Opportunity

- 6.01 The Site provides a highly sustainable brownfield redevelopment opportunity within the Central Area of Luton. It is located on the edge of the town centre and immediately adjacent to Luton Railway Station, where it benefits from excellent access to public transport networks, employment opportunities, educational facilities, shops, community infrastructure and other day-to-day services.
- 6.02 The Site comprises a former factory that has been vacant for a significant period and therefore represents underutilised previously developed land within a highly sustainable built-up area. National planning policy places significant emphasis on the effective reuse of brownfield land. The NPPF confirms that strategic policies should make as much use as possible of previously developed land and that substantial weight should be given to the value of suitable brownfield sites within settlements when meeting identified development needs.
- 6.03 As such, the Site represents a highly sustainable redevelopment opportunity that national planning policy seeks to encourage. Its redevelopment would bring a long-term vacant brownfield site back into productive use, support urban regeneration, contribute towards housing delivery and reduce pressure for

development on greenfield land. This is particularly important within a constrained borough such as Luton, where opportunities for sustainable growth are increasingly limited.

Principle of Residential Development

- 6.04 The Site is an appropriate location for residential development. This part of Luton has undergone significant change in recent years, with a number of former industrial and commercial sites successfully redeveloped for residential use. This includes the adjoining Hatton Place development, where planning permission was granted for the conversion and redevelopment of the site to provide approximately 120 apartments. Plait Court, located to the rear of the Site, was also granted planning permission for a high-density residential scheme comprising approximately 80 apartments. These developments reflect the area's evolving character and demonstrate the acceptability of residential development in this location.
- 6.05 Redevelopment would bring a long-term vacant brownfield site back into productive use, enhance its appearance and contribute positively towards the regeneration of High Town and the wider Central Area. It would also provide an opportunity to deliver a high-quality development that makes efficient use of previously developed land adjacent to the railway station.

Housing Supply

- 6.06 The Site is located within an urban area where high density development is appropriate and encouraged. It adjoins existing multi-storey residential buildings and there are other nearby developments of a similar scale and form.
- 6.07 The Site has the potential to accommodate approximately 30 dwellings and would therefore make a meaningful contribution towards Luton's future housing needs. National planning policy seeks to significantly boost the supply of homes and recognises that small and medium-sized sites can make an important contribution to housing delivery, often coming forward more quickly than larger strategic allocations.
- 6.08 Redevelopment of the Site would provide an opportunity to deliver market and affordable housing on a highly sustainable, previously developed site within the existing urban area, in accordance with the objectives of national planning policy.

No Realistic Prospect of Continued Employment Use

- 6.09 The property has been vacant for over five years and has been actively marketed for employment and commercial uses without generating any serious interest. Evidence previously submitted to the Council as part of the pre-application process demonstrated that there is no realistic prospect of the premises returning to productive employment use.
- 6.10 The building's ageing multi-storey configuration, low floor-to-ceiling heights, constrained servicing arrangements, no onsite parking provision and limited operational flexibility mean that it is no longer capable of meeting the requirements of modern industrial, manufacturing or commercial occupiers. These factors have significantly constrained market demand and contributed to the property's long-term vacancy.
- 6.11 The Council accepted this position through the pre-application process, concluding that there was no realistic prospect of continued employment use and that residential redevelopment would be consistent with local and national planning objectives. The Council's response stated:

"The pre-application submission is supported by a report that confirms the marketing carried out to date to try and attract a new business tenant to the building and the lack of interest shown. The report demonstrates that there is no demand for the existing premises and no realistic prospect of it being used for business purposes in the future."

"The LPA would agree with this view as I can confirm that we would be comfortable with there being no employment floorspace within the proposed development. The proposal would not lead to the loss of a use for which there is a recognised local need and would provide much needed housing in the borough of Luton."

- 6.12 Furthermore, paragraph 127 of the NPPF confirms that planning policies should respond to changes in the demand for land and be informed by regular reviews of allocated sites and land availability. Where there is no reasonable prospect of land coming forward for its allocated use, local planning authorities should support alternative uses that can help to address identified development needs. There is no realistic prospect of the property returning to employment use and redevelopment for housing would make a positive contribution towards meeting identified needs within the Borough.

Flexible Accommodation Based Uses

- 6.13 The Site is promoted primarily for residential development. However, it is also considered suitable for a range of alternative uses. Its location adjacent to the town centre, railway station and key services means it is well placed to accommodate specialist housing, build-to-rent development, student accommodation, hotel use and other compatible town centre uses.
- 6.14 The Site lies within easy walking distance of the University of Bedfordshire's main Luton Campus and is therefore well placed to support student accommodation should demand arise during the plan period. National planning guidance encourages plan-makers to consider the needs of different groups within the community, including students, and to ensure sufficient flexibility exists within plans to respond to changing requirements over time.
- 6.15 The Borough has an ageing population, resulting in an increasing need for specialist accommodation for older people. The Site could therefore provide opportunities for retirement living, assisted living, extra-care housing or other forms of specialist accommodation that support the Borough's changing demographic profile.

Character and appearance

- 6.16 The Site occupies a prominent urban location adjacent to Luton Railway Station and forms part of an area characterised by a varied townscape comprising residential, commercial and mixed use development. Building heights within the surrounding area vary considerably, reflecting the evolving character of this part of High Town.
- 6.17 The Site adjoins a six-storey residential building and is located within an area where other high density developments have been approved and constructed. The surrounding townscape demonstrates that redevelopment can be accommodated at a scale appropriate to this highly accessible location.
- 6.18 The redevelopment of the Site would provide an opportunity to replace a vacant and underutilised building with a high-quality scheme that enhances the character and appearance of the street scene and surrounding area. While the Site retains some heritage interest associated with its former use as a hat factory, including part of the early twentieth-century façade, this remaining historic fabric could be retained and incorporated into any redevelopment proposal. Alternatively, a new development could reference the

site's industrial heritage through its design, preserving its remaining significance. A well designed scheme would create an active and attractive frontage and support the regeneration of the area.

Sustainable Location

- 6.19 The Site is located adjacent to Luton Railway Station, providing future occupiers with direct access to local, regional and national rail services, as well as frequent bus connections, employment opportunities, shops and a wide range of community facilities, all within convenient walking distance.
- 6.20 National planning policy seeks to direct development towards locations that minimise the need to travel and offer a genuine choice of sustainable transport modes. Given its highly sustainable location, the Site is well suited to medium and higher density development, supporting reduced reliance on private vehicles.
- 6.21 The Site is therefore a highly sustainable location for development and is well placed to accommodate growth. Future residents would be able to access employment, education, services and facilities by walking, cycling and public transport. Development of the Site would be consistent with the principles of sustainable development and support the efficient use of previously developed land within a highly sustainable central area.

Availability and Deliverability

- 6.22 The Site is in single ownership, free from constraints and available now for redevelopment. There are no known legal, operational or physical constraints that would prevent the Site from coming forward during the plan period.
- 6.23 Given its vacant status, established ownership position and sustainable location, the Site represents a suitable, available and achievable development opportunity. It is capable of delivering approximately 30 dwellings within the first five years of the emerging Local Plan period and could therefore make an early contribution towards housing supply and regeneration objectives.

7.00 Conclusion

- 7.01 The Site represents a highly sustainable brownfield redevelopment opportunity in an important location adjacent to Luton Railway Station and within easy walking distance of the town centre. It has been vacant for a significant amount of time, has no realistic prospect of returning to employment use and provides an opportunity to bring a previously developed site back into productive use. Redevelopment would support the regeneration of High Town, improve the appearance of the area and make a positive contribution to Luton's future development needs.
- 7.02 The Site could deliver approximately 30 dwellings and make an early contribution towards housing supply. However, its proximity to the University of Bedfordshire, town centre and public transport networks also makes it suitable for a range of other uses, including specialist housing for older persons, student accommodation and hotel use. The Site is therefore well suited to a residential allocation that provides flexibility for these alternative uses, alongside other appropriate town centre compatible development.
- 7.03 The Site is vacant, free from constraints and available now for redevelopment. It is respectfully requested that the Site is allocated within the emerging Local Plan for residential development (Use Class C3), with flexibility for specialist housing, student accommodation, hotel use and other complementary town centre compatible uses. This would ensure the Site can respond to changing needs and market conditions while supporting the Council's housing, regeneration and sustainable development objectives.

