

**Response Matter 24-The Proposed East of Luton Sites – Pt1**

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**Date: 21 February 2020**

**Title: Response to Matter 24 – the proposed ‘East of Luton’ sites – Part 1**

The three ‘East of Luton’ sites are proposed to deliver 1,950 new homes to assist in addressing the unmet housing needs of Luton Borough, which is identified as being 9,300 homes of the Luton plan period of 2011 to 2031

**CONTEXT:**

This alleged unmet need is contained within the Luton BC 2011-2031 Housing Plan where the needs are summarised as follows:

**2011 – 31 Housing strategy says housing need for 20 years is 17800**

Delivered by:

Luton BC (LBC)	8500
Central Beds Council (CBC)	7350
NHDC – East of Luton for LBC	1950
NHDC own build East of Luton	150
	17950

The CBC 7350 and the NHDC 1950 achieves the quoted figure of 9300. Additionally, there is the LBC 2019-22 Housing Plan which breaks down Luton’s housing needs further as follows:

Homes needed	by 2031	Delivered by 2016	% Delivered
1 Bedroom	420	917	218
2 Bedroom	3880	675	17
3 Bedroom	10910	255	2
4 Bedroom	2590	274	10
All	17800	2121	12

Further, Council analysis undertaken in 2019, I believe, refers to a figure of 12800 homes in locations that make a contribution to the purpose i.e. the alleged unmet housing need.

So these documents, produced by and on behalf of LBC have set the strategy for the medium and long term.

**I strongly contend the following:**

- These strategies are predicated on forecast population growth in the Luton area over the strategy period
- The delivery against these strategies thus far bears no relation to the reality of what has happened
- There is overwhelming evidence of brownfield sites to meet housing demand

- There are considerable new housing developments available to CBC that will significantly affect the overall position

## LUTON – POPULATION GROWTH: ADDRESSING MATTER 24.1.a

.....Does the Growth Options Study provide a comparative assessment of the options for addressing the unmet housing needs of Luton Borough?

This study has not been available to me but any housing study must take account of the town's population growth via people moving into the area and birth rate. I am concerned that erroneous and out of date data has been used in such analysis. In this respect the following research highlights how much forecasts have changed in the last 5 years.

- A research & geospatial study in 2015 by the Luton Dept of the Environment and Regeneration concluded that between 2011 – 2031 Luton's population would grow by 24.7% or 1.2% pa on average – a total of 50400 people in that period.

### Luton Population Projections 2011-2041

November 2015

#### Introduction

Luton Borough Council (LBC) produced a set of demographic projections using the most up to date data available. These data projections include updated births, death and migration trends.

**Key Features of the Projections**

- LBC consider that the official mid-year population estimates for Luton produced by the Office for National Statistics have under-estimated the population. Since the 2011 Census the data have more accurately reflected Luton's population to use as a base for the projections. Research is on-going to measure the accuracy of the official estimates.
- The projections run from 2011 to 2041 and are based on projecting current trends in fertility, mortality and migration with the population estimates from 2011-2014 used as a base for the projections.
- A ten year migration trend taking an average of the past ten years migration trends was used to give a longer trend than the official method which uses a five year trend.
- The POPGROUP forecasting model was used for the projections.
- If current trends continue then Luton's population is projected to increase by approximately 50,000 (25%) in the next 20 years and by 70,000 (35%) in the next 30 years.
- All age groups are projected to rise with the largest proportionate increase in the older age group.

#### Ten Year Migration Trend

**Table 1: Luton Population Projections Ten Year Migration Trend**

YEAR	0-4	5 to 15	16-17	18-64	65-89	90+	Total
2011	16,700	30,150	5,400	127,400	23,050	950	203,650
2021	18,050	36,050	5,650	142,600	27,150	1,450	231,000
2031	18,650	38,000	6,600	154,550	33,800	2,400	254,050
2041	19,950	39,050	6,850	165,250	39,450	3,750	274,250
<b>2011-31 Change</b>	1,950	7,850	1,200	27,150	10,750	1,450	50,400
<b>2011-31 % Change</b>	11.7%	26.0%	22.2%	21.3%	46.6%	152.6%	24.7%
<b>2011-41 Change</b>	3,250	8,900	1,450	37,850	16,400	2,800	70,600
<b>2011-41 % Change</b>	19.5%	29.5%	26.9%	29.7%	71.1%	294.7%	34.7%
<b>Proportions</b>							
YEAR	0-4	5 to 15	16-17	18-64	65-89	90+	Total
2011	8.2%	14.8%	2.7%	62.6%	11.3%	0.5%	100%
2021	7.8%	15.6%	2.5%	61.7%	11.8%	0.6%	100%
2031	7.3%	15.0%	2.6%	60.8%	13.3%	0.9%	100%
2041	7.3%	14.2%	2.5%	60.3%	14.4%	1.4%	100%

Source: Luton Borough Council, using POPGROUP software

Research and Geospatial Information Team  
Department of Environment and Regeneration



- A Luton Inclusive Growth Commission Population and Demographics study in 2017 by the LBC Service Director, Policy, Communities and Engagement Luton's concluded population is projected to increase by 17 per cent in next 20 years, with its fastest increase in the elderly population i.e. significantly at odds with the study above.

Extract from 2017 presentation

### Luton Inclusive Growth Commission Population and Demographics

Nicola Monk Service Director, Policy, Communities and Engagement

#### Population Summary

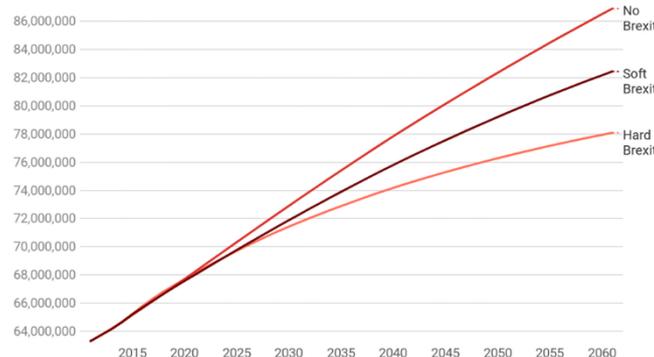
- Luton's current population is 214,700
- Luton is a super-diverse town and one of only three majority non White British towns in the UK
- Luton has a large South Asian population and a growing Eastern European population
- Luton has the 3rd youngest population in the country
- High population churn with approximately 50% of population either not born or not living in Luton at the time of the 2011 Census
- Luton's population is projected to increase by 17 per cent in next 20 years, with its fastest increase in the elderly population

- ONS figures released on 9<sup>th</sup> April 2019 show that Luton's population is projected to grow by 10.1% (0.63% pa and 21900 people) between 2016 and 2031, again at odds with the previous two studies.

CODE	AREA	AGE GROUP	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	
9	E06000032	Luton	5-9	16.7	17.2	17.4	17.7	17.9	18.0	17.6	17.7	17.5	17.4	17.2	17.1	17.0	16.9	16.8	16.7
0	E06000032	Luton	10-14	14.2	14.6	15.2	15.7	16.0	16.4	16.9	17.1	17.3	17.5	17.6	17.4	17.3	17.1	17.0	16.8
1	E06000032	Luton	15-19	13.2	13.3	13.4	13.4	13.6	14.1	14.5	15.1	15.5	15.8	16.2	16.7	16.6	17.1	17.2	17.3
2	E06000032	Luton	20-24	14.6	14.5	14.4	14.3	14.3	14.2	14.1	14.1	14.1	14.4	14.7	15.0	15.6	16.0	16.3	16.6
3	E06000032	Luton	25-29	18.0	17.5	17.1	16.9	16.5	16.1	15.9	15.8	15.5	15.4	15.3	15.2	15.1	15.0	15.2	15.5
4	E06000032	Luton	30-34	19.0	19.2	19.1	18.9	18.7	18.4	17.9	17.6	17.4	17.0	16.6	16.5	16.3	16.1	16.0	15.8
5	E06000032	Luton	35-39	16.0	16.6	17.4	17.7	18.0	18.2	18.3	18.2	18.1	17.9	17.6	17.3	17.0	16.6	16.5	16.2
6	E06000032	Luton	40-44	13.8	13.8	14.0	14.6	15.0	15.4	15.9	16.5	16.8	17.0	17.2	17.2	17.1	17.0	16.8	16.8
7	E06000032	Luton	45-49	13.3	13.4	13.2	13.1	13.2	13.3	13.3	13.4	13.9	14.3	14.7	15.2	15.7	15.9	16.1	16.2
8	E06000032	Luton	50-54	13.2	13.2	13.2	13.1	13.0	13.0	13.0	12.9	12.8	12.8	12.9	12.9	13.0	13.4	13.8	14.2
9	E06000032	Luton	55-59	10.8	11.3	11.7	12.1	12.4	12.6	12.5	12.6	12.5	12.4	12.4	12.3	12.2	12.2	12.2	12.3
0	E06000032	Luton	60-64	8.8	9.0	9.2	9.5	9.9	10.1	10.6	10.9	11.3	11.5	11.7	11.7	11.6	11.7	11.6	11.6
1	E06000032	Luton	65-69	7.6	7.5	7.5	7.6	7.7	7.9	8.1	8.3	8.6	8.9	9.1	9.5	9.9	10.1	10.4	10.6
2	E06000032	Luton	70-74	5.8	6.2	6.4	6.5	6.6	6.7	6.7	6.7	6.8	6.9	7.1	7.2	7.4	7.7	7.9	8.1
3	E06000032	Luton	75-79	5.2	5.1	5.0	4.9	5.0	5.1	5.4	5.6	5.8	5.9	6.0	5.9	6.0	6.1	6.1	6.3
4	E06000032	Luton	80-84	4.0	4.1	4.3	4.4	4.4	4.2	4.1	4.1	4.1	4.2	4.3	4.6	4.8	4.9	5.0	5.1
5	E06000032	Luton	85-89	2.3	2.4	2.5	2.5	2.6	2.7	2.8	3.0	3.0	3.0	3.0	2.9	2.9	2.9	3.0	3.1
6	E06000032	Luton	90+	1.2	1.3	1.3	1.4	1.5	1.5	1.6	1.7	1.7	1.8	1.9	2.0	2.1	2.2	2.3	2.3
7	E06000032	Luton	All ages	215.9	218.0	220.1	222.0	223.6	225.4	228.9	228.3	229.6	230.9	232.1	233.3	234.5	235.6	236.7	237.8

- Although not quantified the many think tanks e.g. LSE state that all population forecasts will require to be downgraded as a result of Brexit, arising from the reduction in immigration numbers.

#### Size of UK population under different Brexit scenarios



Source: Lomax et al. - Get the data

It is accepted that the Luton area may see the creation of up to 18000 jobs over the next 20 years (Luton Labour Party figures) but this has to be set against potential job losses; not the least from the impact of Brexit where January 2020 figures released by the Small Business Prices, show that London & the South East has so far lost 27000 jobs arising from Brexit, thus impacting on many Luton residents who commute to London and other SE locations.



## Brexit Job Loss Index: 436,296 Jobs Lost As Of 31 January 2020

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The Brexit Job Loss Index is an attempt to keep track of the number of jobs lost in the UK due to Brexit.

Here are the key stats (last updated 31/01/2020):

- Total Jobs Lost: **436,296**
- Total Annual Wages Lost\*: **£12,511,660,392**
- Reduction in Annual Income Tax & National Insurance Receipts\*\*: **£3,747,289,625.52**

### Job Losses By Region

- Scotland: 30,223
- Midlands: 26,318
- North East: 22,324
- London: 22,245
- Wales: 14,265
- South West: 13,959
- North West: 9,144
- South East: 5,095
- East of England: 5,027
- Northern Ireland: 2,555
- Gibraltar: 1,000
- Southern England: 870
- No specific region: 283,729

It is therefore, important to understand the basis of any population forecast made by LBC, CBC and NHDC as, clearly this materially affects the view taken on housing to meet any growth. **It would appear that LBC have chosen to adopt the higher figure of 25%.**

- **25% or 50000 population growth / 2.8 per home = 17800 whereas:**
- 17% or 34620 population growth / 2.8 = 12360 homes
- 10.1% or 20360 population growth / 2.8 = 7273 homes

### DELIVERY AGAINST HOUSING STRATEGIES – ADDRESSING MATTER 24.1.b & c

*...comparative assessment of the options for addressing the unmet housing needs of Luton Borough?  
AND .....allow Luton's unmet housing needs to be met on land that is preferable in Green Belt terms to the East of Luton sites. Is the Council's analysis correct, and if not how is it incorrect?*

The strategic requirements that have been set out in the documents referred to have significant and dramatic credibility problems due to:

- Analysis of LBC all planning applications, between 2011 and 2020 to date, reveals that 6533 homes were built or authorised within LBC's area between 2011 and 2016 – not the 2121 referred to above.
- To date, the same analysis shows that since 2011 LBC has authorised some 15265 homes to be built in the area, just 2500 short of the 17800 in the housing strategy forecast from all sources.
- The LBC Brownfield Site Register updated in December 2019 identifies in the region of 1800 potential additional homes to the 15265 homes (drawn from the LBC planning application portal) making a total of 17000 homes within LBCs control to authorise.
- Despite the strategic requirement being quoted as 420 1 bed homes, what has been delivered, to date, is over 3900 homes.

- Either LBC has deliberately ignored its own strategy or they have recognised that the emerging housing market is for smaller homes i.e. 1 and 2 bed, evidenced by the vast number of such homes (in the planning application analysis) that have been authorised the period i.e. 6800 against a defined need of 4300
- Appendix 4 of the 2011 – 2031 LBC Housing Plan identifies 2251 homes at 35 sites that could be built on brownfield land available but clearly 15265 homes at 1200 sites have already been identified to date, plus the further 1800 potential homes in the Brownfield Register.

A summary of the **LBC planning application analysis** undertaken in February 2020 is below, which screened over 18000 planning applications, identifying approximately 1200 new home sites permitted applications between 2011 – 2020 (1,2,3,4 below = beds):

	1	2	3	4	Unspecified	Total
2020	117	150	53	10	1251	1581
2019	604	876	154	122	166	1922
2018	1673	1090	206	64	0	3033
2017	325	270	34	17	1550	2196
2016	326	124	23	7	1031	1511
2015	129	100	88	35	550	902
2014	355	50	51	6	1604	2066
2013	143	67	21	12	130	373
2012	106	159	4	4	448	721
2011	128	66	54	7	705	960
	<b>3906</b>	<b>2952</b>	<b>688</b>	<b>284</b>	<b>7435</b>	<b>15265</b>

#### CENTRAL BEDFORDSHIRE COUNCIL CONTRIBUTION: ADDRESSING MATTER 24.1.d

*...Without the 'East of Luton' sites, are there any realistic alternative options (with a reasonable likelihood of being delivered) for addressing Luton Borough's unmet housing need, bearing in mind the approach being taken in the Central Bedfordshire Local Plan and the current position in relation to the examination of that plan?*

From the CBC planning portal it is clear that Houghton Regis (HR) alone will contribute significantly to the alleged unmet Luton housing needs. This will be substantially through the provision of a 7000 homes development in the Houghton Regis area including between M1 Junction 11A & the A6.

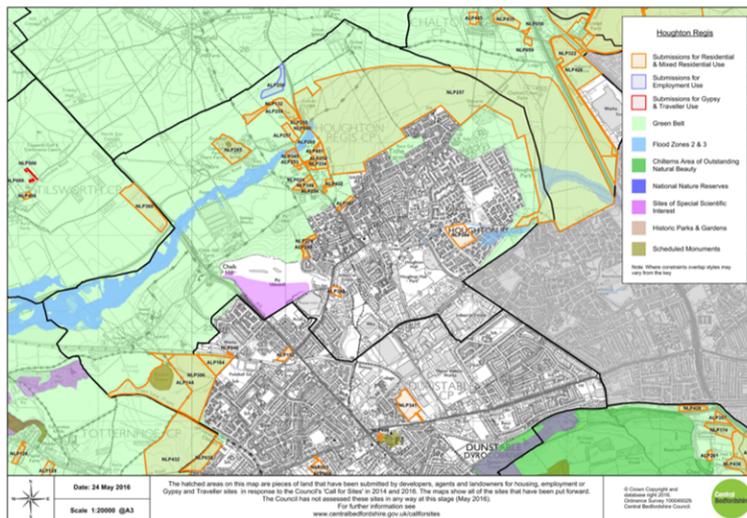


Houghton Regis

2014 ID	2016 ID	Site Name	Site Address	Parish	Site Size GIS (in hectares)	Residential	Employment	G&T
ALP144		North West Dunstable	North West Dunstable	Houghton Regis	44.0266	Yes	No	No
ALP164		Land at Frenchs Avenue	Land at Frenchs Avenue, Dunstable	Houghton Regis	4.2617	Yes	No	No
ALP253		The Stables	The Stables, Driveside Cottage, Bedford Road, Bidwell	Houghton Regis	1.9804	Yes	No	No
ALP254		The Gate	The Gate, Midway Cottage, Bedford Road, Bidwell	Houghton Regis	3.7469	Yes	No	No
ALP255		The Orchard	The Orchard, Bedford Road, Bidwell	Houghton Regis	0.848	Yes	No	No
ALP256		The Field	The Field, Bedford Road, Bidwell	Houghton Regis	1.5156	Yes	No	No
ALP257		The Turn	The Turn, Bedford Road, Bidwell	Houghton Regis	1.5426	Yes	No	No
ALP258		Land north off proposed A5-M1 link Road	Land north of Bedford Road, Bidwell	Houghton Regis	2.9724	No	Yes	No
ALP259		Land west of Bedford Road	Land west of Bedford Road, Bidwell	Houghton Regis	4.6285	Yes	No	No
ALP260		The Bidwell Vision	Land at Bidwell and Parcels Comprising the Bidwell Vision, Bidwell	Houghton Regis	15.1312	Yes	No	No
ALP299		Land west of Coopers Way	Land north and west of Coopers Way and Arnold Way, Houghton Regis	Houghton Regis	1.188	Yes	No	No
ALP307		Bidwell Gospel Hall (Dell Mount)	Bidwell Gospel Hall (Dell Mount), Bedford Road, Houghton Regis	Houghton Regis	0.7763	Yes	No	No
ALP380		Land at the east side of Houghton Road	Land at east side of Houghton Road, Houghton Regis	Houghton Regis	0.9336	Yes	No	No
ALP432		Highfield Barn	Land at Highfield Barn, Bedford Road, Bidwell	Houghton Regis	0.8689	Yes	No	No
ALP481		Land off Bedford Road	Land off Bedford Road, Houghton Regis	Houghton Regis	2.2365	Yes	No	No
NLP024		The Bungalow	Land at the Bungalow, Bedford Road, Bidwell, Houghton Regis LU5 6JS	Houghton Regis	1.069	Yes	No	No
NLP040		The Orchard	The Orchard, Bedford Road, Houghton Regis LU5 6JJ	Houghton Regis	0.848	Yes	No	No
NLP132		Land west of Bedford Rd.	Land west of Bedford Rd, Bidwell LU5 6JP	Houghton Regis	4.62	Yes	No	No
NLP257		Houghton Regis North	Land between the M1 and Bedford Road, north of Houghton Regis	Houghton Regis	261	Yes	Yes	No
NLP274		Land west of Coopers Way	North and west of Coopers Way and Arnold Way Houghton Regis LU5 SEP	Houghton Regis	0.9957	Yes	No	No
NLP285		Oakwell Park	Oakwell Park, Thorn Rd, Thorn Houghton Regis LU5 6JH	Houghton Regis	6.7841	Yes	No	No
NLP306		Tottenhoe	Land to the west of Beecroft off Hillcroft	Houghton Regis	19.3006	Yes	No	No
NLP334		The Gates	Land to the North East of Bedford Rd, Houghton Regis	Houghton Regis	4.2	Yes	No	No
NLP344		Land at Windsor Drive	Windsor Drive Houghton Regis	Houghton Regis	4.7308	Yes	No	No
NLP345		Bidwell Farm House	Bidwell Farm House Bedford Rd Bidwell LU5 6JS	Houghton Regis	1.9754	Yes	No	No
NLP346		Bedford Road	Bedford Road Bidwell LU5 6JS	Houghton Regis	2.582	Yes	No	No

Disclaimer

In fact the CBC planning portal indicates that in the HR area some 140 hectares have been set aside for residential development, across 26 sites. The A6 – M1 portion of land within this is 2.97 hectares.



It seems clear from this that CBC is in a position to significantly over deliver on its stated contribution of 7350 homes to meet the alleged unmet housing need, given the HR area alone will provide over 7000 new homes.

## CONCLUSIONS:

- The housing strategies developed by LBC re the unmet need are fully discredited in every way.
- There is a staggering and unbelievable disconnect between the LBC strategists and those granting housing applications
- The evidence strongly suggests that the corporate ‘will’ of LBC/NHDC and CBC is to build 17800 homes and 1950 homes East of Luton, despite the facts and the logic that emphatically suggest otherwise i.e. a case of ‘don’t let the facts get in the way of a good story.’
- By virtue of the planning application analysis that we have undertaken, LBC has, unknowingly it seems, vastly over-delivered against its housing plans indicating that the figure of 9300 unmet housing need has evaporated.
- The planning analysis also reveals, importantly, the stark reality that it is small, medium and large developers and individuals that are seizing the initiative by identifying new opportunities for housing development and not the Authority. The housing situation is to a large extent being driven by the market and thus bucking any LBC housing strategy. Developers and individuals will continue to do so and LBC will continue to be reactive rather than proactive.
- Considerable, indeed vast potential still exists for housing development from both brownfield sites (1800 at least) and CBC development, totalling over 7000 homes. Thus, the alleged need for 1950 homes for NHDC to build east of Luton, for LBC on precious greenbelt land, is an illusion and completely unnecessary.
- The basis used by LBC to calculate strategic growth in housing i.e. population growth, is murky to say the least. The ONS figures are the most trusted and even those will need downgrading through Brexit. Thus, new forecasts are required that take into account new factors that fundamentally counter older forecasts. These earlier forecasts cannot be used and must not be used to base decisions upon regarding Luton housing needs.
- Finally, it can easily be seen that given what has happened in practice with housing development has massively outstripped any housing plans and taken away any case whatsoever for an east of Luton development of 1950 homes.

## DATA AVAILABLE:

- Planning application analysis drawn from the LBC planning portal in February 2020  
<https://planning.luton.gov.uk/online-applications/search.do?action=advanced>
- 2019 LBC Brownfield site register  
<https://www.luton.gov.uk/Environment/Planning/Regional%20and%20local%20planning/evidence-base/Pages/default.aspx>
- Population growth forecast in the research & geospatial study in 2015 by the Luton Dept of the Environment and Regeneration  
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Planning/Census/Population%20Projection%20Scenarios.pdf>
- A Luton Inclusive Growth Commission Population and Demographics study in 2017 by the LBC Service Director, Policy, Communities and Engagement  
<https://www.luton.gov.uk/Business/Lists/LutonDocuments/PDF/LIF/population-and-demographics.pdf>
- ONS figures released on 9<sup>th</sup> April 2019 on Luton's population forecast to 2031.  
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>
- CBC website planning portal evidence of Houghton Regis land set aside for residential development. [https://www.centralbedfordshire.gov.uk/migrated\\_images/north-of-luton-a3p\\_tcm3-26954.pdf](https://www.centralbedfordshire.gov.uk/migrated_images/north-of-luton-a3p_tcm3-26954.pdf)
- [https://www.centralbedfordshire.gov.uk/migrated\\_images/houghton-regis-schedule-2016\\_tcm3-16462.pdf](https://www.centralbedfordshire.gov.uk/migrated_images/houghton-regis-schedule-2016_tcm3-16462.pdf)