Public consultation

A

Consultation on the draft masterplan

Central Bedfordshire Council worked extensively with the community to reach the draft masterplan, and then held public consultation for 6 weeks.

The following public events were undertaken to help communicate the key messages of the draft masterplan, in order to obtain the views of local residents and stakeholders. This information has helped to ensure that any issues relating to the plans are fully understood before the masterplan is finalised:

Saturday 18th September 2010, Grove Theatre, 10am – 4pm

Manned public exhibition

Sunday 19th September 2010, Dunstable Community Fire Station Open Day

Manned public Exhibition

Monday 20th September 2010, Quadrant Shopping Centre, 11am – 4pm

Manned public exhibition

The exhibition material was then put on display at Priory House Heritage Centre from Friday 1st October 2010 until Monday 1st November 2010.

Specific meetings were also held with those who would be directly affected by, or expressed particular concerned with, some of the proposals. These groups consisted of residents of Dorchester Close and Kingscroft Avenue.

Meetings took place with elected members of the Dunstable Town Council, Dunstable Town Centre Management Committee and the Chiltern Vale Health Consortium Board.

Nearly 4,000 consultation leaflets and questionnaires were made available through the public exhibitions and were also available at Central Bedfordshire Council Dunstable offices, Dunstable Town Council offices, Dunstable Library and the Priory House Heritage Centre. The consultation leaflets were available from a number town centre shops.

The consultation leaflet and questionnaire were available and could be completed on-line on both the Central Bedfordshire Council and the dedicated Masterplan website during the statutory consultation period. Numerous responses were also received from the public separately as letters or emails and we are also taken into account.

Advertisements were placed in local newspapers prior to the statutory consultation period advising the public of the exhibition details and publicising the dedicated masterplan website.

Full analyses on the findings from the consultation period and consequent changes that have been made to this report are set out in 'Draft Masterplan Consultation Findings' (Nov, 2010). This report is available on the dedicated website at www.dunstablemasterplan.info.

Future consultation

The masterplan proposes an indicative development scheme for Dunstable town centre. Further work in terms of viability, detailed design and testing is required and this should take place as individual proposals come forward.

The masterplan is illustrative and intended to provide an indication of the type and quantum of development that could come forward. Public and stakeholder consultation should continue to be a key part of this process.

What has our consultation identified so far?

In the process of reaching a preferred approach for improving the town centre we have undertaken a wide range of consultation events with stakeholders and members of the public. These events were undertaken at two specific stages of the process, firstly, at the start when we wanted to better understand the area and get ideas for improvements, and secondly, once we had created the 3 different options identified above. The findings from these two stages are contained in the following reports, which are on the masterplan website:

Stage 1 Consultation Findings Report

Stage 2 Consultation Findings Report

http://www.dunstablemasterplan.info/documents/consultation-findings/

A summary of the views expressed on the 3 options is set out here. These have directly affected the preferred masterplan option set out within this document.

Residents and stakeholders generally felt that refurbishment of the Quadrant Shopping Centre alone would not be sufficient to improve the quality and range of shops available in the town centre. The most popular proposal was to remove the Quadrant Shopping Centre and replace it with a new and extended street of shops and other uses. There was some concern that, with high vacancies in the town centre already, new development would only increase the number of vacant units. Local research has shown that if sufficient local residents choose to shop more often in Dunstable then local shops would become more profitable and the town more attractive to retailers currently not trading in the town. The aim therefore is to provide a wide-range of measures to create a step-change in the town that will retain existing shops and attract new retailers to the town.

There was little support for any of the proposed locations for the street market, which included its existing location close to Ashton Square, or new locations next to the Priory Church or Grove House gardens. This highlighted that further work was needed in this regard.

The proposal to provide a new NHS medical centre was widely supported and the favoured location was on the site of the ex-Magistrate's Court and Ambulance Station. Just over half of the respondents wanted to see the existing library retained although some noted that it currently feels isolated from the town centre. However, consultation with the library service pointed to high costs associated with necessary repairs to the building. A new cinema was generally a popular suggestion and many people believe it would encourage visits throughout the day and evening, and provide an activity for young people.

The proposals for apartments that were set out in the 3 options were not supported by the majority of respondents and, based on the comments received, this view appears to relate mainly to the number of apartments proposed, the effect this may have on congestion, and a current lack of demand for this type of housing. The provision of housing is an important element of successful town centres though and the masterplan team have re-assessed the balance between housing types for the preferred option put forward in this report. Proposals to remove 28 properties from Dorchester Close to accommodate a new car park and allow for the major redevelopment of the Quadrant Shopping Centre were understandably controversial. Consultation with housing officers at Central Bedfordshire identified family housing, housing for older people and intermediate homes as areas of need to be addressed in the masterplan.

Protecting and celebrating the sense of heritage in the town centre was also seen as a positive part of any proposals, and respondents particularly supported moves to open up new views to Priory Church and improve links between the two parks. The suggestion to develop on Church Close car park was not supported because many consultees felt it would restrict views to the Church and have a negative impact on its setting. As a result the option proposed in this report does not develop on this site.

The majority of respondents were either supportive or undecided about the suggestion to consolidate some town centre car parks and make more efficient use of the land. Those that did not support the proposals had concerns that this might discourage custom into the area. Respondents were also largely undecided about the potential provision of new town centre multi-storey car parks as proposed in Options 2 and 3. The results of our work to resolve this issue is included in this report, as we have aimed to illustrate clearly how the design of the potential structures (i.e. wrapped by shops or landscaped) would mean that the structures are largely shielded from view.

Public consultation Stage 2 options

UK Economy Overview

B

UK Economy Overview

The first estimate of GDP in early 2010 showed the UK economy continuing its recovery, albeit at a slower rate. Labour market figures have been mixed. In the 3 months to February, unemployment rose to a 16-year high of 2.5million or 8.0% of the workforce. This sharply reversed the encouraging signs of the previous 3 months and confirmed the fragility of the recovery. Meanwhile, UK employment continued to decline, falling at an annual rate of -1.4% in the year to February 2010.

Consensus forecasts for the main UK economic variables are given in Table 5.1. The new Government's Emergency Budget will aim to reduce the UK's record fiscal deficit (£163bn in 2009-10) through both cost cutting and increased taxation. Expectations of economic recovery have remained cautious, with growth of 1.3% this year, rising to just over 2% in 2011. Monetary policy remains on hold with interest rates stable at record lows of 0.5%.

% per Annum	Actual	Forecast*	
	2009	2010	2011
GDP	-4.9	1.3	2.1
Manufacturing output	-10.5	1.9	2.2
Inflation (CPI)	1.9	2.1	1.7

Table 5.1: Short-term forecasts for the UK economy

Source: ONS, HM Treasury: A comparison of independent forecasts (April 2010),

* Average of independent forecasts.

Commercial Property Investment Markets

Although the first quarter of 2010 showed an all-property total return of 5.7%, which remains strong, though much reduced from the first quarter of 2009, which saw returns of 9.4%. The pace of capital value rises has declined further in recent months suggesting that the recovery in values is cooling. Capital values rose only 0.7% in May compared with a 1% rise in April.

Whilst capital values have risen rental values have continued to fall in the first 3 months of 2010, having been negative for 23 consecutive months. Retail last recorded positive rental value growth in August 2008 and industrial in October 2008.

Occupier markets

Retail

Retail sales

After an upbeat December, the performance of the retail sector in the first quarter of 2010 was very mixed. The UK economy officially came out of the recession in the fourth quarter last year; however uncertainty surrounding the political and economic future continues to play on consumers' minds. Despite Christmas sales surpassing expectations, many retailers continue to urge caution in what is proving to be a slow and fragile recovery.

According to the BRC-KPMG Sales Monitor, total retail sales were 6.6% ahead in March this year and up 4.4% on a like-for-like basis. Food sales received a boost from the timing of Easter which saw Good Friday and Easter Saturday fall in the March trading period and overall figures were flattered by the comparison with last year's very weak performance.

However, this does not tell the full story for Q1. In stark contrast to March, like-for-like retail sales declined 0.7% in January, the worst sales growth in 15 years. These seemingly poor figures were a result of exceptional issues including heavy snow affecting shopping patterns and the VAT rise that dragged sales forward into December. They also reflect the strength of the festive period, with retailers having much lower stock levels to shift in the January sales.

The retail sector faces a number of challenges over the coming months as key downside risks remain. Most notably, the aftermath of the General Election and the emergency budget will play a significant role in the recovery as the possibility of further VAT and tax increases loom. Furthermore, the continued high unemployment rate and the inevitable rise in interest rates will continue to threaten the stability retail sales into the future, suggesting that the road to recovery will remain erratic for some time to come.

Retail demand

While retail capital values continue to recover, retail rents continue to fall. Renewed occupier demand, as a result of this, means that much of the vacated space prompted by the wave of administrations last year is slowly being re-absorbed back into the market. Retailers are looking to take advantage of less expensive expansion opportunities but remain cautious and are likely only to take a site if the location is right and the deal favourable.

Retail development pipeline

The development pipeline remains slow with little activity planned for 2010. Only 2.7million ft² of shopping centre space is due to open throughout the year, compared with the record 8 million ft² that opened in 2008.

Housing

UK Housing Market

UK house prices are now rising, although price growth is volatile, while mortgage lending and transaction volumes are also a little higher. Housing market trends are usually more difficult to interpret around the turn of the year, but have been made even more difficult this year due to the rush to complete housing purchases prior to the return of the lowest stamp duty threshold from £175,000 to £125,000. The fact that a number of housing market variables are oscillating between positive and negative growth suggests that we are entering a period of uncertainty and unclear direction.

The three month trend in UK house price growth, the most reliable measure of current house price movements, turned positive again in March having dipped into negative territory for one month only during February. The average monthly price change during the three months including February was +0.5% up from -0.3% a month earlier. The trend in monthly house price growth had been slowing steadily between July 2009 and February 2010 but the actual monthly rise in prices in March was a notable 2.0%, reversing the slowing trend of previous months. (Source: Nationwide Monthly House Price Index non-seasonally-adjusted).

The number of transactions had been steadily recovering during much of last year, having reached a trough of 41,000 transactions in January 2009. However, the stamp duty issue caused an abnormal boost in December and made the traditional drop in January more exaggerated than usual. Transaction levels typically increase strongly during the middle six months of the year and are likely to increase to at least some extent this year. However, the current twelve month rolling average, at 900,000 a year, is still little more than half the 1,720,000 level seen at the recent peak in 2007.

UK developers began building more homes again during 2009, with the number increasing as the year progressed. At its peak in early 2007, UK development starts were greater than 50,000 a quarter, but this fell to a low of 16,000 in Q4 2008 and Q1 2009. By Q4 2009, around 26,000 homes were started. (Source: NHBC. NHBC accounts for circa 80% of all housing starts).

Residential Land Market

Overall the UK land market remains quiet and, although demand for development land in certain locations is very strong a number of factors continue to create a drag on the market. Broadly speaking, a wider demand for land has evolved as the housing market has recovered, but the presently restrictive conditions for development have meant that the number of viable bidders for land has remained rather constrained.

Developers and housebuilders, buoyed by a significantly stronger housing market, are very keen to buy land in central London although demand for land outside of the central London core is proving far less desirable.

There are three main factors creating drag on the land market. These are: restrictive development finance; the requirements for S106; and the need to meet the Code for Sustainable Homes. Many sites are still not viable with current requirements for affordable housing even when development finance is available.

Funding

Transportation infrastructure will need to be funded through developer contributions via Section 106 (Town and Country Planning Act, 1990) or developer works implemented through Section 278 (Highways Act, 1980) for improvements to the Highway, as well as contributions from public funding sources within the Highways Agency and Central Bedfordshire Council. In setting the level of funding and works sought through Section 106 and Section 278 respectively, it will be important to ensure that development schemes remain viable. It is important to note that as Section 278 and 106 improvements are dependent on developer activity and given the recent announcements regarding Central Government spending restraints, it is impossible to know timescales and how much funding will be available for the delivery of the transportation infrastructure package.

Availability of public sector funding

With details of the Emergency Budget yet to be published and spending reviews across all sectors of Government there is a great deal of uncertainty with regard to financial planning of the majority of regeneration projects across the UK.

What is clear is that public sector funding will come under increased scrutiny until the budget deficit has been substantially reduced. Due the condition of public finances it is Central Bedfordshire Council's view that there is unlikely to be any significant Public Sector funding to help in the delivery of the Masterplan in Dunstable in the next few years.

This being the case, alternative financial models to assist in delivery should be explored. These include:-

- Local Asset Backed Vehicles (LABVs) have been promoted elsewhere as structures for delivery of regeneration projects; however these rely on the relevant Local Authority entering into a partnership with a developer where the Local Authority has a significant land holding to contribute to the joint venture. Sadly, there is little which Central Bedfordshire could contribute and this structure is therefore unlikely to be financially viable or deliverable.
- Tax Increment Financing (TIFs) are widely used in the USA as a way of funding upfront infrastructure costs for development and have been promoted by bodies in the UK such as the British Council of Shopping Centres (BCSC) as a potential new way to enable development in the current challenging market conditions. The premise behind this structure is that infrastructure costs for development are funded through the issue of a bond which is then repaid through the increase in local taxation as a result of the increased value attributed to the development. This structure is currently being explored by the Government; the position should be monitored and considered as a possible source of funding for the Master Plan if legislation is passed.
- Prudential Borrowing – Although the Public sector can access preferential lending rates through, for example, the Public Works Loan Board, the use of prudential borrowing is unlikely to be encouraged as a source of funding or subsidy for development at a time when the primary concern is of a reduction in public sector debt, rather than an expansion of it.

Private Sector Funding

Macro economic conditions as a result of the recession and banking crisis mean that funding for redevelopment / regeneration projects is difficult to secure. Where finance is available the costs of this funding has increased together with an increase in required loan to value ratios. This paucity of funding has had a detrimental effect on the development pipeline where schemes have either been scaled back of stopped altogether.

In addition to difficulties in securing finance the current uncertainty over the budget deficit, unemployment and potential tax rises have contributed to a general malaise in the occupational markets.

The limited funding available for developers (and therefore schemes that developers are currently considering) is therefore allocated to the more risk reduced schemes such as, for example, those pre let to one of the big four food stores.

We must acknowledge that the Masterplan should provide a framework for the desired change in Dunstable but the delivery of the proposals will be driven by the appetite of the private sector and their view of the opportunity that Dunstable presents as well as broader macro economic conditions.

However, the market will improve. If and when private sector investment in Dunstable is secured, these investors will inevitably have their own views on how Dunstable should be developed. Consequently the indicative layout of the Masterplan must not be considered by Officers, Members and members of the public, to be set in stone.

Secondary Shopping Centres

The British Council of Shopping Centres, a body which represents the retail property industry, has recently published a paper, **"Secondary centres; the impact of the recession on secondary shopping centres."**

The paper outlines key issues which are currently affecting secondary retail centres across the whole of the UK, and which can be considered particularly pertinent to Dunstable. Prior to outlining a recommended Delivery Strategy for the Masterplan objectives, it is useful to put Dunstable in context and dwell on the challenges that are inherent in the secondary retail property market in the UK.

The paper states:

Secondary shopping centres in the UK have been particularly hard hit by the current financial downturn. A number of secondary centres were significantly expanded in recent years resulting in an oversupply of floor space in many smaller localities. This problem of oversupply has been exacerbated by a combination of factors including the crisis in the financial and credit markets, shorter lease lengths and a downturn in consumer confidence resulting in retail insolvencies. Ultimately, this has resulted in significant falls in value and to the deterioration of already weakened assets.

Many of the UK's worst affected retail locations are found in the heart of town centres. Empty units in these locations are more than blights on the landscape and a financial drain: they represent a downward spiral in vulnerable areas where retail centres should act as major contributors to long-term job creation, social cohesion and a sense of community. Retail is a dynamic industry but we are entering a long period where many town centres are going through a painful period of re-adjustment.

Despite welcome improvements in commercial property value indices results from beneficial yield shifts and softening rental pressure, there remain very significant structural problems in the secondary market.

The magnitude of the problem

Between 2004 and 2008 there were an unprecedented number of shopping centre transactions, the majority being secondary centre assets. Lending was widely available and subject to favourable interest rates, and loan terms. Due to the financial crisis in late 2008 and early 2009, commercial property values tumbled and owners now face assets worth, in some cases, half of what they originally paid for them with little chance of a rise in value in the short-term.

There are around 820 shopping centres in the UK. It has been estimated that approximately 155 shopping centres are 'at risk' of defaulting on loans that were provided by banks to purchase these assets. This equates to approximately one in every five shopping centres in the UK being at risk of loan default.

The most recent period of investment (2004-2008) saw the emergence of the private investor seeking high returns from assets held for very short periods of time (sometimes only 24 months). This 'flipping' of assets has led to chronic under investment in some centres.

A growing polarisation in the UK shopping centre market will be observed, where strong prime schemes with good tenant mix, car parking, and transport links, will continue to fare better than secondary centres that cannot provide such attributes."

In Dunstable's case, the above quote is pertinent to the Quadrant Shopping centre, which was purchased in the mid 2000s when the market for such schemes was bullish. Since this time there has been little investment in the centre and values have tumbled. The Quadrant Shopping Centre is currently being marketed at a price of £19m, reflective of a net initial yield of circa 7% (the expression of income as a proportion of price) significantly less than what the current owners paid for the asset.

Coupled with falling asset values and under investment, the second element to this structural problem is outlined as follows:

The role of the retailer

Retailers are actively reviewing their store strategy and portfolios, often looking to take stores in just the top 50 and top 100 towns that serve the majority of the UK population via their respective catchment areas. Secondary centres are no longer targets (having a store in every town is no longer a priority) and this in turn has increased vacancy levels across the UK as leases are not extended when they come up for renewal.

Some retailers have been more fortunate than those that have closed due to administration and undergone 'restructuring' via pre-pack administration. In streamlining their stores, retailers strip out poor performing stores with the chance to re-negotiate existing stores' lease terms. However, this reduces rental income, which does not help enhance the value of the shopping centre.

Retailer incentives are proving to be popular initiatives by shopping centres trying to attract new names to their centres. Banks are keen to see these go to tenants with strong covenants (e.g. dominant national brand with proven track records).

Retailers have an important role in helping improve a centre's vitality and viability. Strong tenant/owner relationships were viewed as essential as well as encouraging tenant mix engineering to secure the best mix of retailers aligned with the centre's customer.

It is important for owners and asset managers to understand the requirements of the retailer, and re-configuring units or parts of the scheme should be considered if capital for these types of works is made available.

In Dunstable's case it is crucial that units of the right size and configuration are able to be offered to retailers in order to tempt them into the town. Many retail acquisition strategies are now based on looking at the dominant centres, which will then capture the retail spend from surrounding areas (in Dunstable's case, Milton Keynes and Luton are considered dominant). If units of the right size and configuration in the correct environment cannot be offered then retailers will not consider this as a location to trade from. The masterplan must therefore offer flexibility in the configuration of retail space that it provides.

The BCSC recommend that a flexible approach to centres is adopted and see some evidence of this from the banking sector:

Proactive processes already in action

Banks are being pragmatic when faced with the request for further capital outlay. The majority of banks (75% according to the survey) said that they would look at 'sharing the pain' with the existing borrower and releasing more capital, to help initiatives such as tenant incentives and small scale refurbishments.

When faced with administration, all banks interviewed sought to find a change of asset manager. Banks were keen to stress that for the most part and with the majority of their assets, they were working well with existing borrowers and there would not be any 'fire-sales' if they could manage the situations effectively. They indicated that they would be prepared to accommodate breaches of loan-to-value covenants rather than foreclose, where debt service appeared to be secure.

More flexibility is needed when dealing with secondary centre assets and having an adjustable asset plan in place is seen to be very beneficial.

Banks will only fund investments that make economic sense and this will ultimately drive their lending strategy. They will put in place the necessary vehicles to ensure maximum investment recovery, if their investment is not being managed appropriately.

Banks will look at flexibility but only on the basis that they make economic sense. Meanwhile,

Local authorities should be encouraged to engage with stakeholders at the earliest opportunity to help proactively manage shopping centres be they prime or secondary, are an important part in making a town or city viable and attractive to consumers. Shopping centres should play an integral part of every town or city's asset management plan.

Through the Masterplan Central Bedfordshire has, and continues to engage with key stakeholders and landowners in Dunstable in order to promote the town's viability and vitality.

Meanwhile for landlords there has been an element of fire fighting in recent letting strategies, where:

There is a focus in some secondary shopping centres (due to the large falls in their values) to concentrate on generating income rather than driving value. This has been illustrated by flexibility in rents and service charge payments, especially to new incoming tenants.

The BCSC urge caution with regards to any recovery in secondary centre values and estimate that any return to previous values will take at least 3-5 years. A patient view should be adopted, where assets are considered as long term holds.

Steps can be taken to ensure that these centres recover, including better asset management, a more proactive approach to the use of CPO and planning laws by both National and Local Government and a more collaborative approach by stakeholders:

Conclusions and next steps

The plight of secondary centres falling into further decline is an issue that has to addressed, primarily by the banks and their borrowers. Understanding the depth of the situation each party was in is paramount.

It is important for all parties to realise that the yield compressions witnessed in the final few months of 2009 are really only applicable to prime assets. Waiting for inward yield shifts for secondary shopping centres will take considerably longer, of at least 3-5 years.

A more patient view should be adopted by the property industry as a whole, especially where values are involved. Shopping centre owners need to realise that they should view their assets as long-term holds and be prepared for a slow and arduous recovery. Banks should, in turn, be flexible and be prepared to wait longer to see a return on their capital.

Banks, especially, highlighted the apparent lack of skills among asset managers and owners. There may be merit in addressing skills gaps via seminars/programmes made available via the industry.

Overall sentiment towards Government changing its policy on empty property rate relief was generally negative, despite this being a critical issue for the industry, and where there is cross-industry support for policy change.

The focus for local authorities should be on having a viable, fit for purpose shopping centre. Failing shopping centres could therefore benefit from a relaxation of planning and CPO laws to help speed much needed development where this approach is warranted.

Shopping centres play an important part in social cohesion and are instrumental to a community. They are places to shop, be entertained, provide jobs, encourage retail expenditure, keep travel costs low and attract visitors from outside the area. Their failure can be detrimental to all parties involved: consumers, local authorities, owners/asset managers, retailers and banks. These stakeholders must work collaboratively and understand the scale of the task ahead to ensure a mutually positive outcome.

C

Conservation Area Appraisal

Much of Dunstable Town Centre is within a Conservation Area. In parallel with the masterplan, a draft conservation area appraisal has been undertaken. This assesses the setting, character and appearance of the conservation area and emphasises what requires preservation and what opportunities exist for enhancement. This work has informed the proposals in this masterplan document, specifically around the overarching aims for the future management of change within the conservation area, and the instigation of conservation area enhancement. These are:

1. To retain and enhance the conservation area's more significant buildings, and where necessary to halt their deterioration.

This should be achieved by a combination of practical guidance and advice for owners and tenants on building maintenance, the robust use of planning policy and legal powers when necessary, and by securing external funding for repairs where possible.

2. To ensure that new development takes full account of the town's rich archaeological heritage, and that this heritage is used to promote Dunstable as a good place in which to work, live, study and visit.

Wherever possible, to secure the removal of those buildings and elements which detract from the character, appearance and setting of the conservation area, and to encourage new development of a high quality that works with the grain and historic character of the town.

3. To create an attractive environment within and around the conservation area, that will attract new, long-term investment, both public and private.

Central to this is the reduction of through-traffic in the town centre, achieved through implementation of the proposed A5-M1 link road and the subsequent de-trucking of the A5 through the town centre.

4. To establish effective, long-term conservation area management through an appropriate cycle of conservation area review and the monitoring of change.

The Draft Dunstable Conservation Area Appraisal reports the findings of the current conservation area review, and includes recommendations for improved public realm treatments and shop front improvement schemes, both of which have direct links with the masterplan proposals

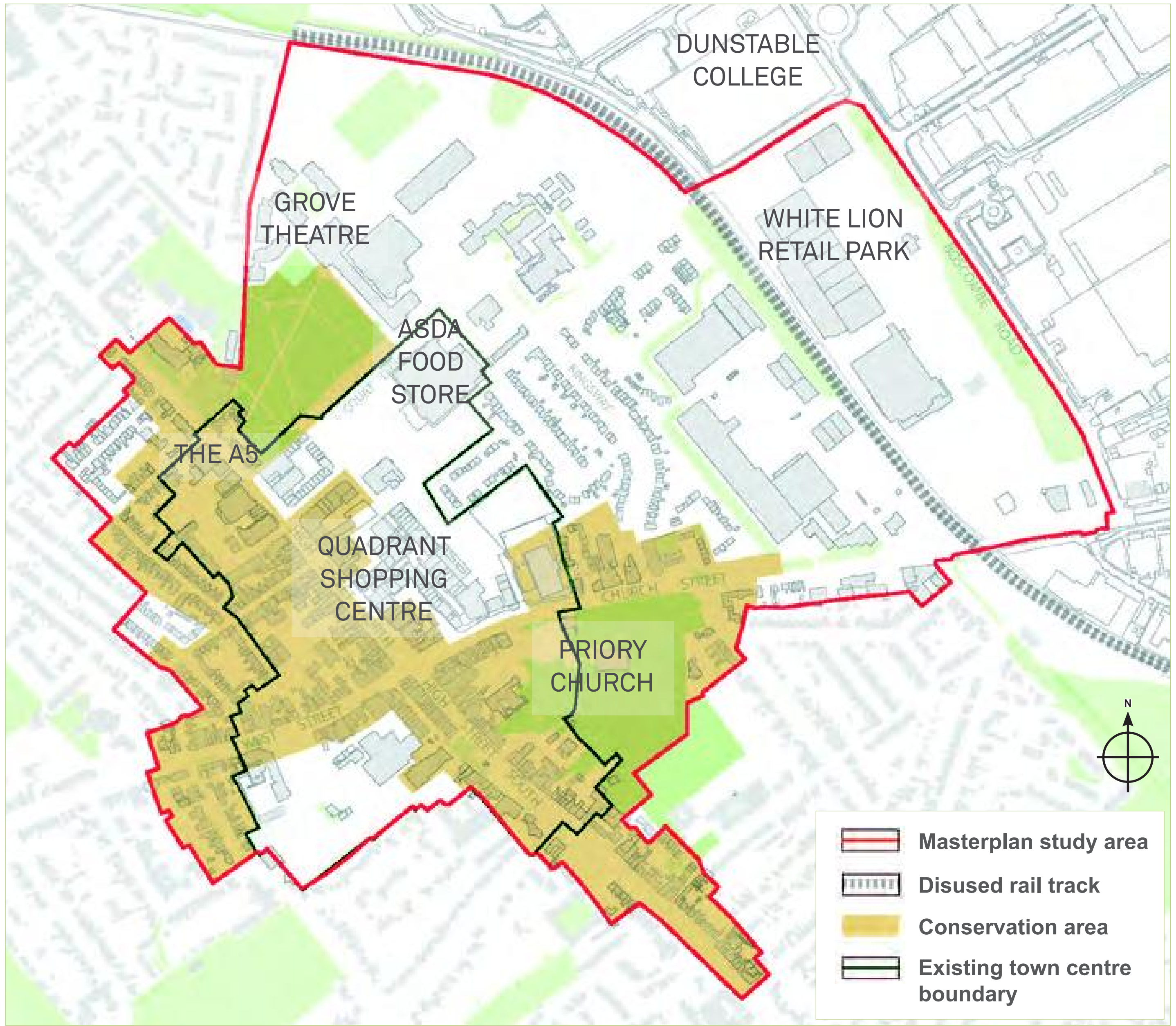

Figure B.1: Masterplan study area and Conservation Area

Luton and South Bedfordshire Core Strategy:
Key Diagram

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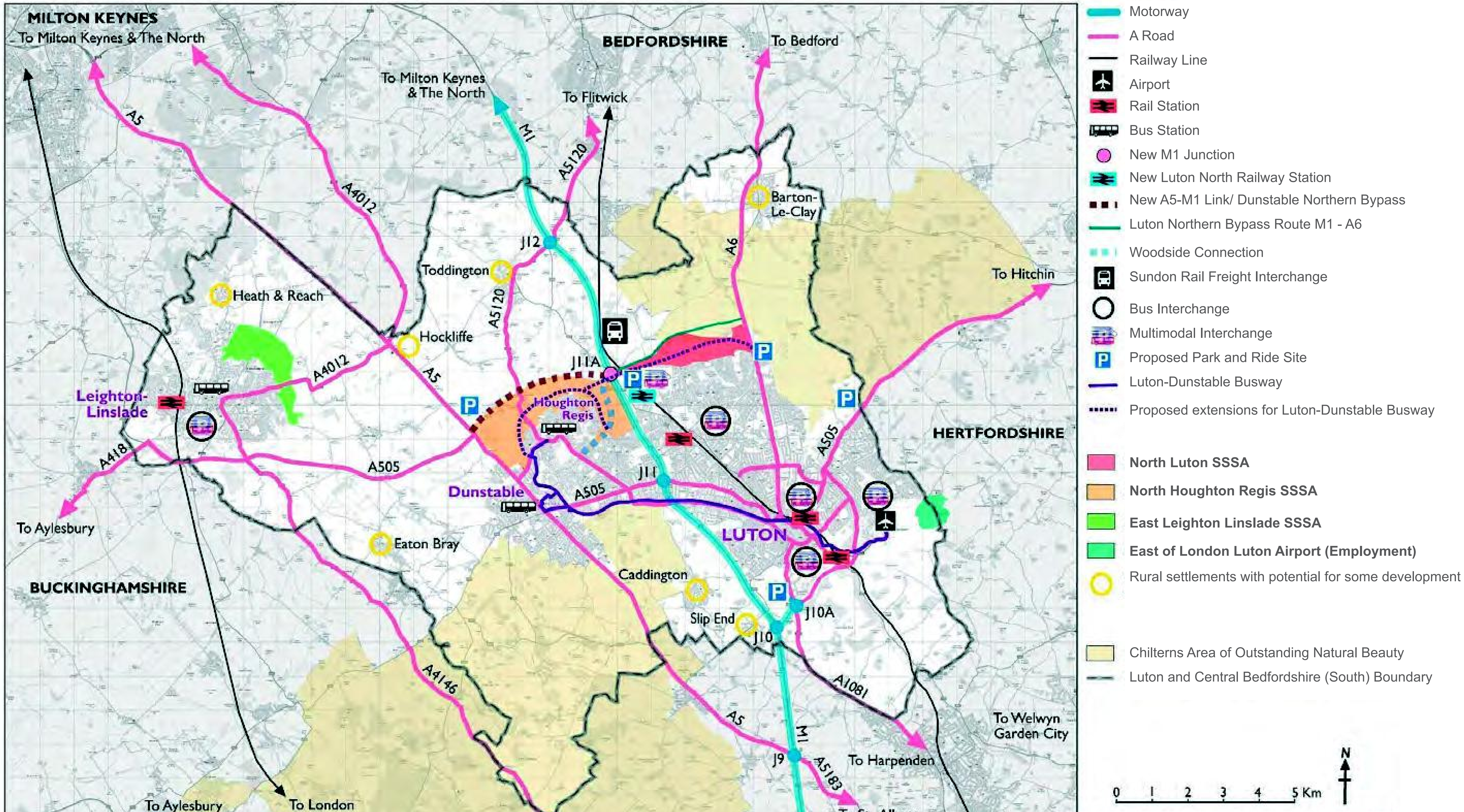
Luton and South Bedfordshire Core Strategy: Key Diagram



Produced by Newgrove Consultants Ltd. July 2010

Alternative options for parking in the Heritage Quarter

E

Alternative Option 1

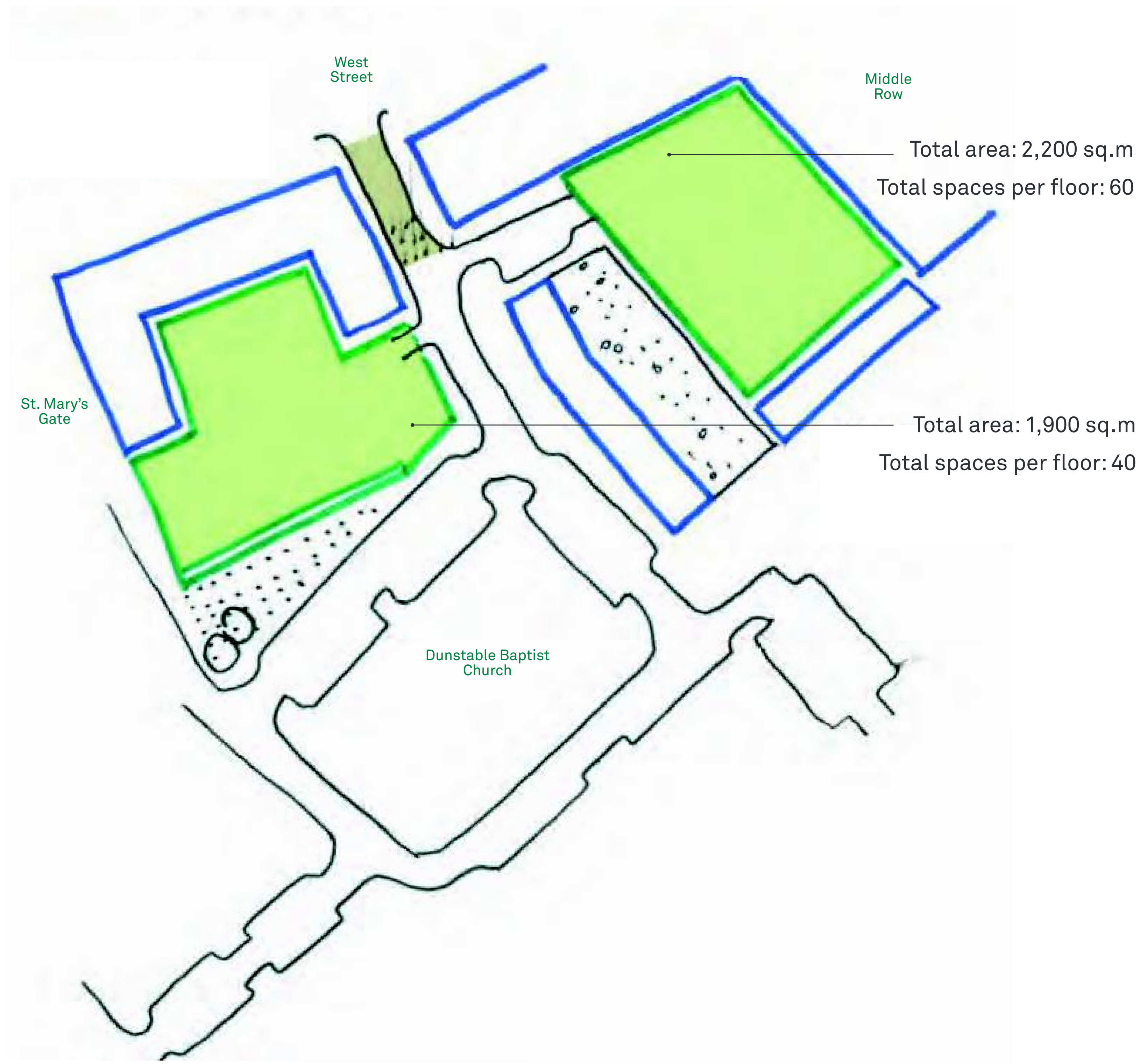
This option proposes two multi-storey car parks, west of Middle Row and north of Dunstable Baptist Church, with a green wall to the south and additional landscaped area.

Advantages of alternative option 1

- Increase in number of apartments
- Increase in number of parking spaces

Disadvantages of alternative option 1

- Loss of family housing
- Loss of sense of enclosure
- If the access from West Street is blocked, there may be increased congestion in accessing car parking from the south
- Green Wall and adjacent landscape will require maintenance by the Local Authority



Alternative Option 2

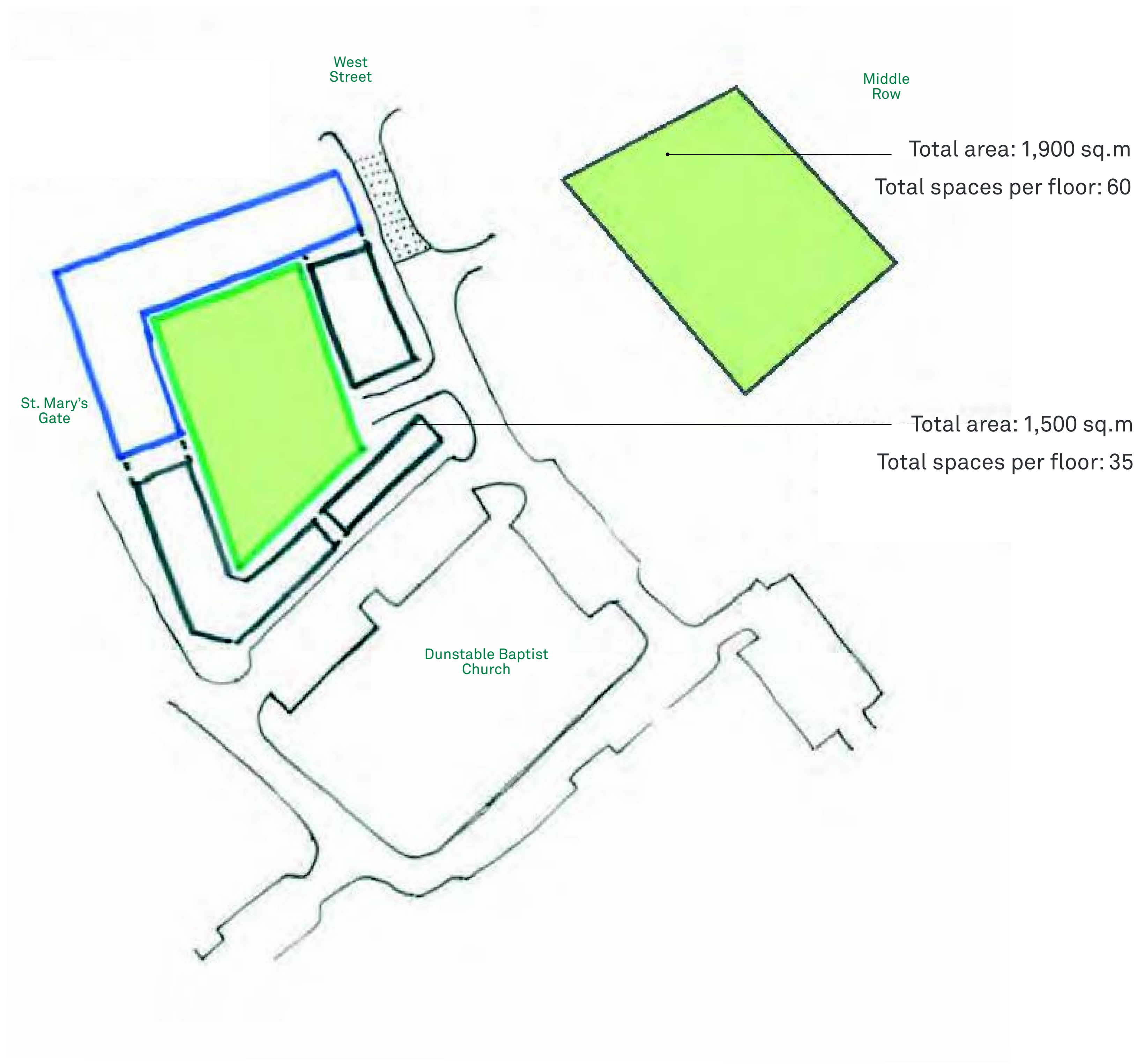
This option proposes two multi-storey car parks, west of Middle Row and north of Dunstable Baptist Church, with additional development wrapped to the south, west and east.

Advantages of alternative option 2

- Fewer parking spaces than alternative Option 1 but more than Option 3
- Minimised landscape areas to be maintained by the local authority
- Frontages on all four sides of the additional car park not only create enclosure but also a better environment for a residential neighbourhood.
- Better meets the aspirations for this area in terms of character.

Disadvantages of alternative option 2

- If the access from West
- Loss of sense of enclosure
- If the access from West Street is blocked, there may be increased congestion in accessing car parking from the south
- Family housing replaced by apartments to the north of Dunstable Baptist Church.



Alternative Option 3

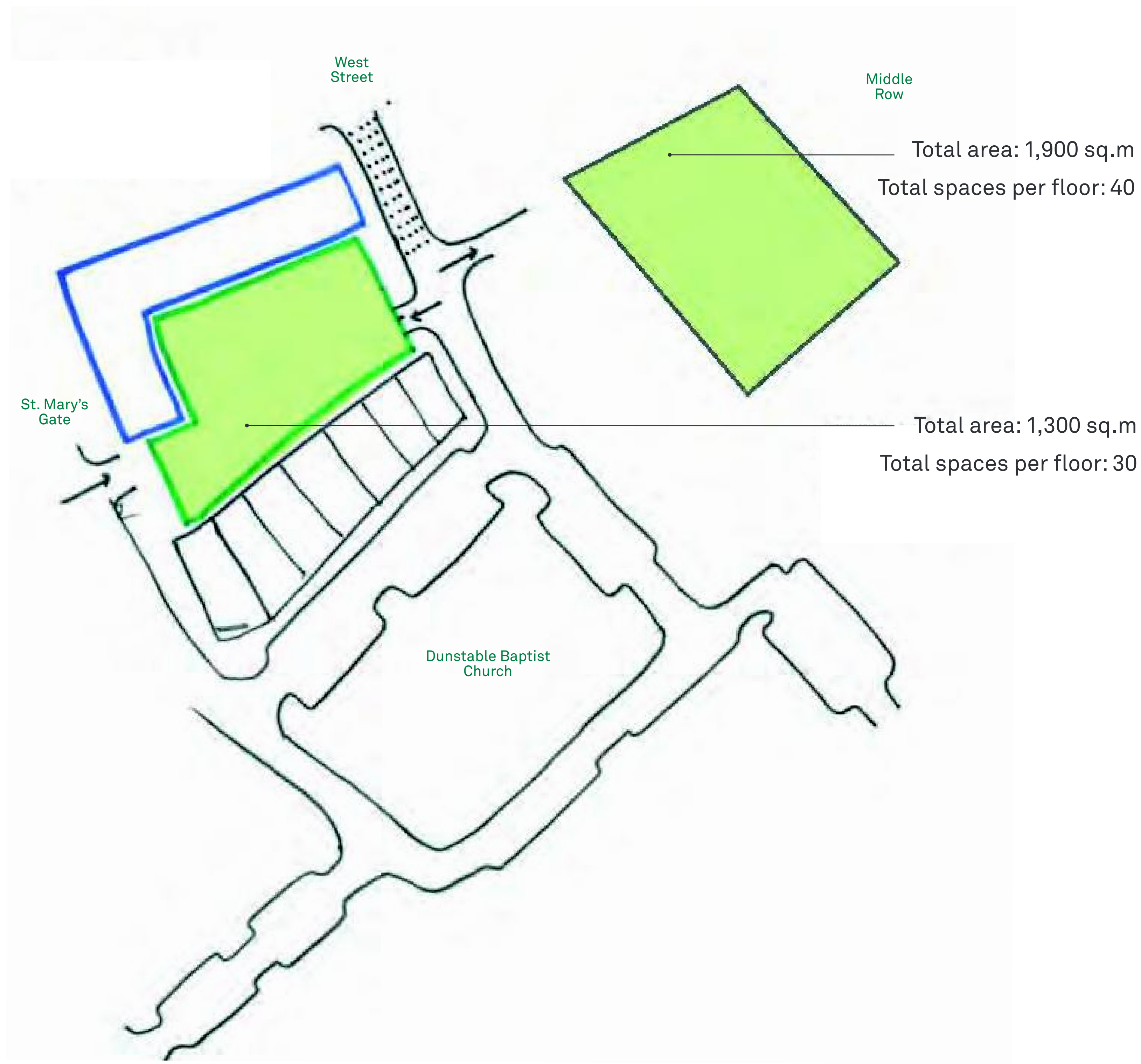
This option proposes two multi-storey car parks, west of Middle Row and north of Dunstable Baptist Church, with a green wall to the south and retains the proposal for townhouses adjacent to the additional MSCP.

Advantages of alternative option 3

- Retention of family housing is conducive to the character of the area
- Frontage on the north of the square create a good sense of enclosure
- Minimises landscape areas to be maintained by local authority

Disadvantages of alternative option 3

- Provides fewer spaces compared with options 1 and 2
- Loss of surface car parking
- If the access from West Street is blocked, there may be increased congestion in accessing car parking from the south
- Creation of family housing that backs onto a Multi-Storey Car Park



Alternative Option 4

This option proposes a larger Multi-Storey Car Park west of Middle Row and consequently does not propose apartments east of Dunstable Baptist Church. The west facing wall of the car park would need to be covered with a green wall.

Advantages of alternative option 4

- A single larger Multi-Storey Car Park may be more economical and manageable.
- Some surface parking retained
- Maximises the number of parking spaces
- Retains family houses north of Dunstable Baptist Church to the square
- Conducive to the vision for the character of the area

Disadvantages of alternative option 4

- Loss of apartments
- Loss of frontage to the east of the square
- Landscape areas and green wall would require maintenance by the local authority
- If the access from West Street is blocked, there may be increased congestion in accessing car parking from the south