

**The Local Plan Team**

Luton Council

Your ref:

Sent by email

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Our ref: Luton Plan Reg 18

Date: 03/02/2025

Dear Sirs,

**Luton Local Plan Review - Issues and Options Consultation (Regulation 18 Document)**

Thank you for consulting with Central Bedfordshire Council (CBC) on the Luton Community Involvement Paper - Issues and Options Consultation (Regulation 18). We welcome the opportunity to comment on the document, and we look forward to continuing the good working relations that have already been forged between the two Councils. To this end, we hope you find the comments below useful.

General Comments

It is evident from the consultation document that a lot of background information has been gathered to inform the issues identified within the current consultation document which is good to see. Being in such close proximity, there are a number of strategic cross-boundary matters to be discussed in relation to the new Local Plan for Luton, as well as that for Central Bedfordshire, and, whilst our first Duty to Co-operate (DtC) meeting was held post-publication of these consultation documents, we are pleased to see these have been identified at a high level through the Luton Strategic Matters Matrix. We appreciate that you are at the early stages of the Plan process and that you are still gathering evidence to inform and support your Plan. As discussed, and agreed at our DtC meeting on the 30<sup>th</sup> January, there would be benefits for both authorities in the sharing of evidence base studies and information to support and aid the delivery of successful Local Plans for our respective areas; and there may also be benefit in aligning our plan periods. CBC has recently confirmed the new Local Plan period of 2025-2050.

Meeting Identified Needs

As discussed, the National Planning Policy Framework (NPPF) has now been published which confirms the need for authorities to implement the new Standard Methodology for calculating housing needs. The ability, as referenced within the consultation documents, to argue against the Standard Method is no longer included. We appreciate that a housing target cannot be fixed for the new Local Plan for Luton until

the end date of the plan is agreed, so we will reserve further comments on the level of development needs to be provided by the plan until this evidence is available.

The current consultation documents suggest that a Strategic Housing Needs Assessment will be commissioned to support the new Local Plan and that a Call for Sites is currently underway to identify sites to meet needs once identified. As discussed at our recent meeting, CBC would stress the importance of 'leaving no stone unturned' when it comes to identifying and delivering land to meet the identified housing, employment and Gypsy and Traveller needs for the next plan period and would expect to see robust evidence that this has been undertaken, including the consideration of building upwards with taller buildings to meet housing needs and a proactive site search approach, prior to Luton Council approaching other Local Authorities about any potential unmet needs.

### Vision & Objectives

The Council welcomes the positive and forward thinking Vision for the new Local Plan. The objectives identified at this stage seem appropriate but may be better presented in themes for clarity and ease of understanding.

### Affordable Housing

Given the significant affordable housing needs depicted, and tangible increase in numbers housed within temporary accommodation, it would seem appropriate for the Local Plan to consider the provision of an increased percentage requirement of affordable housing provision from qualifying sites. The affordable housing needs and percentage requirements will need to be evidenced through a Housing Needs Assessment. Local Plan policy should require the onsite provision of affordable housing.

Considering the significant overprovision of flats that is referenced, particularly one bed flats, the suggested option for considering the reduced obligations to provide for family housing seems illogical. Paragraph 5.15 indicates that two thirds of the 11,000 households on the waiting list require two or more bedrooms, for example for one or two adults with children, or multi-generational households. The need for family accommodation should be prioritised over and above the provision for smaller flats, which are quoted to have delivered for over 60% 1 bed provision from a total of 7,000 new homes between 2011 – 2023, whilst the Strategic Housing Market Assessment identified a need for 1% (quoted within para 5.4).

Any future Local Plan Policies in relation to affordable housing should be clearly evidenced based (via a needs assessment) which will identify the affordable housing need (overall percentage requirement), tenure of the affordable housing (percentage requirement of social rented, affordable rented and intermediate tenures).

### Self and Custom Build Homes

Local Plan Policy should set a percentage requirement for self / custom build provision, delivering for the identified needs from the self and custom housebuilding register which is maintained by the Council. Custom build provides for an alternative form of housing provision, enabling the initial purchaser to genuinely customise and purchase a

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property which differs from the standard house type. This option can also be considered as part of the affordable housing, through customisation opportunities for shared ownership housing.

#### Sustainable Infrastructure and Funding

Option 4 in the 'sustainable infrastructure and funding' section asks, 'is there any key infrastructure that should be protected or improved for example minerals distribution facilities?'

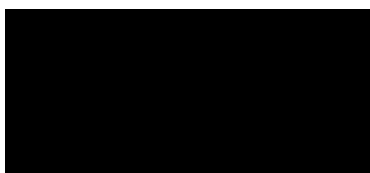
The Council considers that all existing strategic minerals and waste facilities should be protected. These include waste recycling and transfer centres, rail-served aggregates depots, concrete batching and asphalt plants. Many of these operations can generate noise, dust and smell and it is important that sensitive forms of new development are not permitted adjacent to existing operations. This is to ensure that existing facilities can continue to operate without additional constraints being imposed (the 'agent of change' principle).

#### Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) Scoping Report

Paragraph 2.31 states that there are no mineral operations within Luton. While there are no active quarries, it is important to note that minerals companies do operate rail-served depots, concrete batching and asphalt plants within the town. These operations are essential for the sustainable supply of minerals needed to support the provisions of Luton's local plan.

Reference 76 and the last sentence of paragraph 3.66 relate to the 2005 minerals and waste plan. However, the provisions of that plan no-longer apply to Luton.

Yours Sincerely



**Caroline Danby**  
Head of Strategic Growth