

Response (31 January 2025)

Name and title: Mr Colin Hall

Organisation: I write on my own behalf. However, I am a Quaker and Green Party member, and have been Secretary of Bedfordshire Climate Change Forum for a number of years.

Address: [REDACTED]

Luton
Bedfordshire

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Topic Luton Context

Q 1

- a) More could be written about Luton's history and historical context, not least about population influxes and outflows (together with their sociology), economic development and key economic features, industry, education, religions and patterns of growth.
- b) More could be written about Luton's geographical setting, including its marvellous setting in relation to the Chiltern Hills, sub-regional links, and aspects of the natural environment. Perhaps more photographs for both a) and b).
- c) It is also important to consider national or world situations and crises as the setting for any Plan. More on this below. Arguably, a plan should be based on Risk Assessment that might include worst cases scenarios. I list some aspects of crisis in d).
- d) Crises:
 - Still growing financial inequality, which corrodes trust, increases illness, notably mental illness, and diminishes concern for the environment, amongst other great ills. See *The Spirit Level*, a seminal work by Wilkinson and Pickett that deserves to be a politician's bible. Economic forces can stunt our hearts and minds.
 - Mental ill health amongst the young. Are we will the worst in Europe? There is a huge challenge within point 4.3.2 that needs to be acknowledged.
 - Risk of further pandemics or other health crises.
 - Erosion of democracy itself and liberal values.
 - Breakdown in multi-lateral processes (UN, WHO, many others)
 - With this, growing conflicts and wars
 - Catastrophic climate emergency, a "threat multiplier", with extreme weather events, that could produce mass migrations, societal breakdown, food insecurity, and armed conflict.

- And many others.

Some of these are explored later in the Paper, but I would welcome an acknowledgement of risks in the Context, a probability-severity rating as regards the Town Plan. Also a sense of the economic costs of action on aspects of the Vision and the associated Objectives, plus at a later stage a time-based action plan to map out a possible programme of delivery as part of the Plan itself. It all needs to be “real”.

Topic Developing our Vision

Q 2

- a) There is much to welcome in the Vision. I love the opening phrase “A transformed town”. Should this also include “transformed people and behaviour within it?” However, could more work be done on the Vision? A Vision is presumably meant to inspire as well as inform and create a framework, a “compelling vision”. I suggest that the current wording loses impact and energy through generalisation or lack of directness. One instance: the 2040 Vision itself is referred to but not actually restated, though it may have been absorbed into other statements within the Vision.

Topic Developing our Objectives

Q 3

- a) There is much to commend in the Objectives. O ,P, Q, and R are particularly well-stated on Climate Change, though I suggest that adaptation to inevitable global heating and associated extreme heat waves with threats to health needs far greater priority and highlighting. The provision of cheaper community energy via renewables may become crucial for national security and also to compete with other towns (recalling the economic value of a Luton power station historically at Power Court that attracted industry).
- b) G raises concerns. Is the suggestion to take land from parks and green spaces? These are precious in our densely populated town, as recognised in the Paper.
- c) I tentatively suggest a further objective: around preserving and enhancing allotments and gardens and possibly parks with a view to establishing a major project around urban horticulture (“Edible Luton”, not just “Edible high Town”), including community orchards, and reaching out into the surrounding countryside to promote peri-urban horticulture, with all sorts of health and lifestyle benefits, as well as linking with other objectives on climate change mitigation and health. See 5.107. Vertical and roof top gardens, together with urban planting for pollinators, could be just one further means towards the “greening of Luton”.
- d) Objective J: “to raise the level of skills”. This seems rightly to have been part of the town’s agenda for twenty year or more. To ensure that it actually happens, perhaps more incisive thinking and wording are required.
- e) Objective R: Later in the paper comes comment on how nature-depleted the UK is. Can this wording take more account of the disastrous declines that we face in numbers of species and abundance, which the Paper highlights later. Can public connection with nature and indeed other aspects of our urban environment also be included?

Topic Our Strategy

Q 4

2045 seems to compete with the 2040 targets unless the plan deliberately explains how the further five years will take things further or address other aspects. These distant dates could also feel as though “the can is being kicked further down the road”. Equally, should we not be thinking ahead into “deep time”? Why not 2100? What will life be like in Luton for grandchildren of now and their children? Do we need a cascading series of plans, with action plans, dates and targets being mapped?

Topic Housing Location and Delivery

Q 6

We must house all our people properly, noting that one possible trend in Luton is for a more transient population, and that crises of many kinds may intensify housing needs beyond the current situation and perhaps beyond easy imagining. Are there possibilities of using our existing housing stock more intensively? Are many houses under-occupied as well as those with multiple occupancy – this seems to be indicated at one point?

I sympathise with much of the thinking and questions raised. However, will we have sufficient infrastructure (in many senses) for new building development? To raise just one aspect, is it not the case that the Chilterns is already a much water-deprived and water-stressed area of the country?

Topic Housing Mix

Q 8

Luton Council is rightly concerned that we need to raise the quality of rented accommodation and new build through much more effective planning controls by local government. This in turn can help to achieve both flexibility and the “right mix” of homes.

Topic Self Build and Custom Build Homes

Q 10

Probably yes, fostering innovation and “Eco build” but within a framework of local regulation to achieve quality design and construction.

Topic Space Standards

Q 12

Yes to options A and B.

Topic Luton's Economy

Q 16

The paper identifies the ingrained problems of the Luton economy. Could one approach be to really go after "Green" jobs with a major skills training input from colleges and the University? At the very least, there are huge opportunities and needs for retrofitting the older parts of our housing stock; also thereby helping to deliver green energy development and gains. Octopus Energy could be a great partner to consider working with.

Options C, D and E are also valuable – but must be linked with general improvements in the quality of the town, its culture and amenities.

Topic The Airport

Q 17

The airport may bring fewer benefits to the town than claimed, and may have distorted its economic development. . The economic benefits of airport expansion are questioned in a relatively new report from the New Economics Foundation (NEF) called *Losing Altitude*, published in 2023.

Here are some links:

"Growth in air traffic implies a significant transfer of welfare from the majority, who suffer the ill effects of greenhouse gas emissions, noise, and reduced air quality, to a wealthy minority of frequent flyers."

"The sector is, in fact, one of the poorest job creators in the economy per pound of revenue."

"Productivity growth in air transport has not translated into increased wages..."

"This wage squeeze has been felt exclusively by middle and lower-paid workers, with real wages at the top seeing real-terms growth."

As your Paper notes later (5.263), "80% of employees at the airport for example travel from within Bedfordshire, Hertfordshire and Buckinghamshire." A further reason to question the economic benefits to the town, and to note our road traffic problems.

[Losing altitude -The economics of air transport in Great Britain \(neweconomics.org\)](https://www.neweconomics.org/insights/losing-altitude-the-economics-of-air-transport-in-great-britain)

See pp.27 and 28 especially. Airport expansion seems to promote overall economic growth in developing economies with poor connectivity at earlier stages of their development. It also favours countries with high rates of inbound tourism. Neither of these applies to the UK (we have some inbound tourism, but part of the problem in terms of the British economy is that it enables Brits to go abroad and spend there for their holidays).

Studies in Germany indicate low economic benefits from the expansion of smaller and medium sized airports - and may well apply to the UK.

"Furthermore, there are several comparable case studies, particularly from Germany, which highlight contexts in which air capacity growth can be detrimental to a region's economic wellbeing, particularly when it comes to smaller regional airports."

I leave others to comment further on the airport in relation to the Luton Plan and the town transport plan, except to recall the carbon costs of further expansion of passenger numbers, set against the judgment of the Climate Change Committee, which states as one of its ten key messages: “there should be no net airport expansion across the UK.” And a reminder. Back in 2019, Luton Council could have heeded the message in the Anthesis Report, which it commissioned, at some considerable expense, on the actions that must be taken in Luton to tackle climate change: “The majority of flights taken from Luton Airport are for leisure rather than business, suggesting that the council could look at engaging with leisure travel passengers to consider alternative options.” (p.44). A cautiously worded piece of advice, but I have never heard any official connected with the Council or the Airport ever remotely act on it – quite the reverse.

Topic Luton Town Centre

Q 24

I broadly support the development along the lines of the Town Centre Masterplan Framework, while advocating a greater emphasis on sustainability and the greening of Luton through connections with plants, pollinators and birds, and through urban horticulture.

Topic Health and Wellbeing

Q 27

Profoundly important issues. Medical services seem currently very overstretched. Options C, D, E all have merit.

Topic Noise, Light Pollution and Hazardous Substances

Q 28

Vital to address the issues of pollution and contamination rightly raised.

Light and noise pollution. I commend the Council for introducing LED street lighting. I sense that a lower level of lighting is used at night, the more so later at night (is this correct?). Can this be taken further, for purposes of carbon and cost saving, without compromising safety for road travel and safety of citizens, noting too that light pollution has a damaging effect on wildlife? EVs will reduce the level of noise pollution from transport. Can other measures be taken decrease light and noise pollution from transport?

Aircraft noise can be overwhelming in parts of south and central Luton, most of all in the summer: a sonic assault on the people and creatures of the area.

Can we please include pollution hazards from plastics, microplastics, and “For ever chemicals” (PBFAS)?

Topic Air Quality

Q 29

I support the proposals that are listed to address air quality issues, which are so important. A transformed “Greener” Luton would include enhanced air quality as an absolute must.

Topic Climate Change

Q 31

I strongly support the concerns and actions that are covered. There are many indications that climate change is happening faster than central predictions, with extreme weather events occurring with alarming severity and frequency. The world needs to act “five times faster”, to echo the title of the book by Simon Sharpe (2023), and Luton must be part of that acceleration. Also, the risks from climate breakdown must be factored into any Town Plan (see my earlier comments), remembering that climate change is a threat multiplier.

The town might go much further on renewables than the document suggests. Homes, schools, carparks, public spaces could all be used. Stronger links with other local councils could release land relatively adjacent to the town for wind turbines and solar farms. If nothing else, make the commitment to renewables more visible, and a part of the urban landscape. Again, advice and perhaps partnership could be sought from an organisation such as Octopus Energy. Luton Community Energy projects can also be a vital way forward and a means to securing public involvement and buy-in.

I have seen little or no evidence that the Town is addressing the risks to health of extreme heatwaves. Does new building take any account of this currently? Note that tree planting can have a vital role in reducing the urban heat island effect.

Topic Water Quality and Water Efficiency

Q 33

I strongly support the analysis and actions mentioned.

Topic Biodiversity Net Gain

Q 35

Nature is in deep trouble in the UK, as you indicate, in ways the public do not always understand. My own observations suggest sudden catastrophe for pollinators in 2024, partly through long-term decline, but much heightened by the cold wet Spring and early Summer. There were almost no wasps last year – terrible because wasps are a very valuable part of the web of the life.

I rejoice in some of Luton’s rich biodiversity, such as can be admired in Cowslip Meadow, for example. I treasure the work of Dr Trevor Tween. However, we can go much further, and so I support Options A and B, particularly. It is worth noting that biodiversity in our towns is especially valuable because our countryside is often so denuded, perhaps most of all in arable areas of England. For instance, take the decline of a generalist iconic species like the hedgehog from 36 millions in the 1960s to under one million now. However, hedgehog numbers in towns are more or less stable. As a

beekeeper, I note that the average flight distance of a honeybee to gather nectar and pollen is around 500 yards in towns, but 700 yards in the countryside.

Topic The Historic Environment

Q 45

The Paper makes valuable points. One suggestion is that there is far more explanation of Luton's history and historic assets, with more explanatory panels and signage complemented by online guides and resources that will bring a stronger understanding and sense of place. This will strengthen civic identity and our personal identities within it.

Topic Design Review Panels

Q 47

I strongly support such panels. The answers to other questions may lie within their remit and guidance, for instance on the place of taller buildings and how tall they should be in various locations - and in strengthening a sense of place. An architectural overview and input is long overdue for our town.

Topic Encouraging Sustainable Travel

Q 50

The analysis rightly points to the severe road traffic problems in Luton.

- a) The Plan firmly and frankly addresses the issue of catastrophic climate emergency, and must align with measures in the town's climate action planning. Transport is now the largest sector of GHG emissions at around 26% of the UK total and 28% of all domestic emissions. This is because transport and agriculture have made much less progress in helping the country to meet its carbon targets. Urgent, radical action on transport is a must, with a dynamic, regulatory approach on many fronts, leading to a profound change in culture and behaviour.
- b) There are many economic aspects of travel to highlight. To consider just one aspect, road transport comes with various forms of financial cost, direct and indirect, among them damage and maintenance, congestion, and ill health related to pollution and air quality, and lack of exercise. A question to pose is around the economic health and efficiency of our town in terms of its transport, all the more so as we are looking at a long-term goal of 2050. Another test question: Why live or situate your business in Luton, as regards transport?
- c) The problem of the motor car in Luton. Once a cradle of the motor industry through the Vauxhall works, our town is being suffocated by cars (noting second car ownership as the major factor for the increase nationally). This takes many forms, including frequent congestion or slow-moving traffic, and sheer density of traffic. Many side streets are saturated with parked vehicles, often on the pavements, often on corners and road junctions, or around schools at certain times, in many instances with engines left running, and no awareness of the possible damage to children's health from pollution, including nitrous oxide and particulate pollution.

- d) Demand management essential - especially for car travel and ownership. This needs to have as primary aim a change of culture away from the idea of the car as the primary means of transport (the view of 84% of the public), noting the sense of identity, desirable life-style and personal freedom invested in the motor car (as seen in car advertising). The difficulties, the opposition, the vested interests, will be great. And great skill and resolve will be needed both nationally and locally to create a way forward.
- e) Public education, again nationally and locally in the true costs of car ownership is required, covering different aspects: the financial costs individually and society-wide (it has been claimed that many less well-off households in Luton spend as much as quarter of the family income running a car), the health benefits of active travel by walking and cycling; the various advantages of efficient public transport (as in cities like London); the social responsibilities to the environment and other people in how we travel including our behaviour; the huge gains to be made from “going electric”. If the car must be used, then it should be recognised for the dangers that it poses for others, particularly if it is an SUV or an EV. Overall: who are our roads and streets for? Who “owns them”? Everyone, but with top priority to pedestrians and cyclists, the public transport, then necessary commercial vehicles, and lastly motor cars and their passengers. A test as regards side streets could be: “Can children play safely in time? Do people connect and relate to each other in our streets? Use them to exercise healthily?”
- f) The electric revolution on the roads. Clearly, we need to electrify our transport system as rapidly as possible. I commend the introduction of charging points so far in Luton, but ask that it be hugely extended. There are social justice issues. If you have a house with a drive, much cheaper home charging is often possible. Cheaper electricity for motoring should be equal for all. Buses should become electric as soon as possible, along with all council vehicles (a process already in place, I gather, and applaud). There has been a great increase in electric scooters and bikes in Luton – perhaps to be welcomed and made much more widely available (currently most used by younger males?). The Lime system of hire of electric bikes and scooters, available in London and Milton Keynes, might be tried in Luton, for example. However, this fast-developing mode of transport also needs legitimised and controlled, with safety and calming especially in mind. Currently, we have an uneasy mix currently of vehicles, electrics and pedestrians, with unresolved questions about speed limits, crash helmets, lights, and whether electric bikes and scooters should be on or off the roads and on the pavements, or indeed have dedicated lanes in future.
- g) Buses. I commend the Council’s work on trying to improve the town’s bus services, and hope that it will continue, as a key ingredient of a transformed transport system. Nationally, only 4% of journey distance covered were by bus and coach (government statistic for 2023), and if a similar rate applies in Luton, it is essential that it increases greatly, through a frequent, punctual, affordable system, with a good sense of comfort, information, and security for all – and a change of culture - that this is the way to travel very often. The DRT service mentioned in the paper (developed to include dial-a-ride, car shares, taxis) seems a very positive way to create an integrated and flexible citizen-serving provision. It would be great to revert to the £2 maximum for all journeys or have as many concessions as possible to provide financial motivation for travel by bus.
- h) A shift toward pedestrianisation and Luton as a car-free town. I support the introduction of low emission zones. Consider limiting car access and parking in the town centre and as many streets as possible. “Home zones” in the Netherlands offer one model. There are many possibilities: making more roads one-way; enforcing speed restrictions in side streets (20 mph widely flouted; 20 = 30 is a near norm; and for a really dangerous minority 20 = 40 and

more). Currently, there is little or no enforcement; more cameras and more road humps are required, but also policing and perhaps when possible technological solutions to record speeds and speeding of all vehicles. 10 mph restrictions should also be considered, especially given the narrow "lanes" available in some Luton streets because of densely parked cars on either side. Roads and streets should also be designed to make them as nature-friendly as possible, with trees retained and further tree planting, along with planters for lower growing shrubs, herbs and flowers. The School Streets experiment offers another possibility already piloted in Luton, hopefully to be extended or replaced by another way of preventing or discouraging car use and promoting walking or cycling. I am glad that further Park and Ride is another possibility in Luton.

Overall, the Paper contains a wealth of thinking. Many thanks for the opportunities to comment.