



Historic England

Mr Chris Thom  
Luton Borough Council  
George Street  
Luton  
LU1 2BQ  
[localplan@luton.gov.uk](mailto:localplan@luton.gov.uk)

Our ref: PL00797117

Your ref:

Telephone



27 January 2025

Dear Mr Thom

## Luton Local Plan Review Duty to Cooperate and Consultation Background Paper December 2024

Thank you for consulting Historic England on the Duty to Cooperate and Consultation Background Paper for Luton December 2024. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

We support the general aims and approach set out in the Background Paper.

### 1. Do you agree that the correct strategic matters have been identified?

The Strategic Matters set out in the table 1 are a helpful starting point.

### 2. Should any additional strategic matters be added to the list?

As discussed in our DtC meeting last week, in addition to those identified in the document we suggest adding the following categories for Historic England within the matrix, while recognising that some topics will be greater interest to HE than others.

- Flood risk
- Utilities
- Health and local facilities
- Cultural infrastructure

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 582749 [historicengland.org.uk](http://historicengland.org.uk)



- Transport
  - Waste
  - Minerals
- 
- Urban Design (including taller buildings/skyline and densities) could also be matter where joint working will be required).

3. Do you agree that the council has identified the correct relevant authorities and bodies to cooperate with on each strategic matter?

We welcome the identification of Historic England as a prescribed body and have highlighted above those topics where we would also welcome cooperation.

4. Do you agree with the proposed methods of engagement for your organisation?

We have commented separately on the SCI. We look forward to continuing to work with you and the rest of the team as part of the on-going duty to co-operate on strategic matters, both during formal consultation stages but also in between in relation to the preparation of evidence for the Local Plan.

5. Do you have any suggestions for how the council could encourage or improve cooperation on strategic matters?

No

### Other Comments on Background Paper

- Paragraph 1.58 Is it worth separating Historic environment and natural environment sections?
- Paragraph 1.58 scheduled monuments
- Paragraphs 1.58/9 add reference to the Registered Parks Gardens and Scheduled Monuments by name and reference to the GI listed St Mary's church
- Paragraph 1.94 Should this also include Historic England or just in para 1.107

We hope that the above comments are of assistance. We look forward to continuing to work with you and the rest of the team as part of the on-going duty to co-operate on strategic matters.



Historic England

Yours sincerely

Debbie Mack  
Historic Environment Planning Advisor



Historic England, Brooklands [REDACTED]  
Telephone [REDACTED] [historicengland.org.uk](http://historicengland.org.uk)

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data please visit: [historicengland.org.uk/terms/privacy](http://historicengland.org.uk/terms/privacy)