

From: [Xavier Preston](#)
To: [Thom, Chris](#)
Cc: [LRC Local Plan](#)
Subject: Luton Borough Council - Issues and Options Consultation
Date: 06 March 2025 15:49:46
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Dear Planning Policy at Luton Borough Council,
Thank you for consulting HCC on the Issues and Options Consultation and other associated consultations. Thank you for the extension of time in responding, please accept the significant delay in responding to yourself and I hope the below response is still of use.
HCC has the following comments;

HCC LLFA

- HCC LLFA response to Question 32 – How can the Local Plan help Luton be more resilient and adaptive to flood risk?
 1. Should policies promote the naturalisation and de-culverting of the River Lea to increase food plain storage?
 - a. Yes. As the Lea is upstream of Hertfordshire in Luton, we would highly support de-culverting in upstream catchment which would reduce flood risk in Hertfordshire.
 2. Should we promote a multi-functional approach to drainage – for example, promoting systems that increase water use efficiency, improve water quality, improve biodiversity and urban greening?
 - a. Yes – HCC would be highly supportive of promoting the 4 pillars of SuDS and water supply efficiency and re-use, etc. These would likely improve water quantity and quality in Hertfordshire.
 3. Do you have any suggestions on how Luton could be made more resilient and adaptive to flood risk?
 - a. No HCC comments
 4. Should developments be required to slow the flow of surface water – such as through permeable materials, water conservation and sustainable drainage systems?
 - a. Yes, definitely. Failure to do so could increase flood risk downstream.
 5. Should developments be required to separate surface water from foul drainage?
 - a. Yes – HCC is highly supportive of removing surface water from foul systems to reduce the risk of combined sewer overflows.

As an additional request, HCC would ask that all developments that discharge into systems upstream of Hertfordshire (such as the River Lea and River Ver) and associated watercourses and sewers must be restricted to greenfield runoff rates and volumes to ensure flood risk is not increased in Hertfordshire. Similarly, treatment should be provided for surface water runoff to protect water quality.

HCC Highways

HCC would like to ask that any Luton Local Plan considers its alignment with the neighbouring North Herts Local Plan. The following comment is around improving connectivity.

A505 – East/West connections

HCC LTP4 and the North Hertfordshire Local Plan identifies the A505 as an important east-west transport link. This link is particularly important between Luton/Hitchin and Luton/Stevenage as there isn't a direct rail link. The proposed Luton Airport Expansion will also necessitate better interurban passenger transport connectivity and sustainable travel links between towns.

This and other corridors are highlighted in HCC's Local Transport Plan:

Corridor 2: London-Watford-Luton-Milton Keynes

The primary connections within this movement corridor are the M1, M25, A405, the Midland Main Line and West Coast Main Line. These carry strategic long-distance movements, but also cater for more local inter-urban movements. The M1 and M25 are routes of national strategic importance and carry large quantities of freight. Several other A roads in the corridor cater predominantly for local movements but are impacted when there are problems on the more strategic routes. There is significant travel demand by road and rail into London. The Abbey Line branch railway provides a connection between St Albans and Watford with significant onward commuter travel to London. Luton Airport generates significant travel demand. Notable commuter patterns are from Luton and Dunstable to St Albans and Hemel Hempstead, and between Hemel Hempstead and Watford. The main scheme priorities for the corridor are to improve interurban passenger transport connectivity, rail enhancements to provide sufficient capacity and service levels to London and beyond: and improvements to rail station accessibility. We will work with Luton Borough Council and airport operators on improving surface access to Luton Airport, and work with Highways England to ensure effective operation of M1 with improved connections to enable economic development in north-east Hemel Hempstead.

Corridor 6: Luton – Stevenage

The primary connections within this strategic movement corridor are the A505 and A602. These routes provide the strategic link between Luton, Luton Airport, the A1(M) and Stevenage, as well as serving the towns of Hitchin, Letchworth Garden City and Baldock. In addition to these towns, Luton Airport generates a significant amount of traffic on the corridor.

Cross-Boundary housing allocations

The plan acknowledges that Luton cannot meet all its housing needs within its boundaries and relies on neighbouring authorities like North Hertfordshire to accommodate the unmet need. Given the national increase in housing targets and the pressures facing the local authorities to meet these targets, it is important that authorities work closely together should the Luton Local Plan propose different housing targets/sites which alter the reliance on North Hertfordshire to meet its needs. Further considerations also needed on the impact of proposed allocations to local areas, transport, greenbelt etc.

HCC would like to continue to be notified of updates and any further consultations in relation to the Luton BC Local Plan to ensure that HCC teams continue to be able to engage appropriately and inform the plan at every stage.

Kind regards,



Xavier Preston
Senior Planning Officer | Growth & Infrastructure Unit | Sustainable Growth
Hertfordshire County Council
Office Address: [REDACTED]
Postal Point: [REDACTED]
Telephone: [REDACTED]
[REDACTED]



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Hertfordshire, guided by our RISE values



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