

**Response to Luton Local Plan Review – Community Involvement Paper 2024 from Luton’s Lead
Local Flood Authority**

Question 31

How can we adapt to and mitigate against the impacts of climate change? This includes flooding from rivers and rainfall and temperature extremes. Please see separate submission from our Principal Climate Change Officer.

Question 32

How can the Local Plan help Luton be more resilient and adaptive to flood risk?

Policy LLP3 is a good tool for Town Centre and the River Lea, see additional below.

Options

1. Should policies promote the naturalisation and de-culverting of the River Lea to increase flood plain storage? *Yes, but also to allow for improved culvert maintenance. This is specific to the Town Centre that would benefit from a specific policy as naturalisation is more appropriate where there is space for flood plain storage ie. Outside of Town Centre.*
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? *Yes, there is an opportunity here to integrate landscaping, drainage and BNG on-site.*
3. Do you have any suggestions on how Luton could be made more resilient and adaptive to flood risk? *Yes, more Sustainable Drainage Systems (SuDS) on a large scale can assist in resilience to flood risk and adaptation of the built environment by adding in green pockets of amenity, biodiversity and aid in reducing the urban heat island effect. SuDS used to take water off of the highway to reduce drainage blockages/overwhelm would also provide betterment to diffuse pollutants.*
4. Should developments be required to slow the flow of surface water – such as through permeable materials, water conservation and sustainable drainage systems? *Yes, as per the National Planning Policy Framework (NPPF) but applied to all developments would be the betterment.*
5. Should developments be required to separate surface water from foul drainage? *Yes.*

Question 33

How can we improve water quality in Luton’s rivers and improve water efficiency in new developments? *More campaigns by the Council about what not to put down the drains would be beneficial in Luton. It is likely that many residents don’t know that surface water drains discharge directly to rivers. One person’s water waste disposal can impact on their own local environment.*

Options

1. Should we explore adopting tougher water efficiency standards in a new Local Plan, including greater promotion of rainwater harvesting? *Yes! This is paramount in a water-stressed area such as Luton and will benefit climate change adaptation.*

2. How can we ensure new developments contribute towards our waterbodies meeting “good” ecological status? [Enforcement of clean discharge to surface water drains/streams. Check new development connections to the correct discharge pipes.](#)

3. Should a new Local Plan policy contain stronger wording so that development must provide for the satisfactory disposal of surface water to deliver water quality improvements to receiving water courses and aquifers? [Yes! Our aquifers provide our drinking water. Wider education on this could also help.](#)

4. Should SuDS be multi-functional - for example, seeking to improve water quality, biodiversity, and contributing towards blue and green infrastructure in the borough? [Yes! Quality, Quantity, \(of water\) biodiversity and amenity are the four pillars of SuDS.](#)

5.136 As we work on our new Local Plan we will be producing a number of new evidence base studies, which will include a new Water Cycle Study and Green and Blue Infrastructure study. These will be used to inform new policies, which provide the opportunity to address water efficiency through requiring higher standards to be met on new developments and the promotion of rainwater harvesting. [Should also include redevelopments eg. Brownfield sites, change of use etc.](#)

Question 34

Are there any Issues or Options you think we have not considered in this Chapter? [There are no impacts considered for water shortages. One approach could be to include a water reduction strategy such as water savers – to be fitted to new developments to reduce water used to flush toilets.](#)

Question 35

How should a new Local Plan approach biodiversity net gain? [If increasing BNG means more green space or increasing water storage, it's great for flood risk mitigation. Promotion of the following to provide BNG would be useful:](#)

- [Vegetated swales](#)
- [Rain gardens](#)
- [Green roofs](#)
- [The above provide amenity and biodiversity](#)

Options 1.

Should we consider having a Local Plan requirement for higher than 10% biodiversity net gain to be achieved on certain developments (e.g. 20%)? This would be subject to viability testing. [Yes.](#)

2. Should we consider a Local Plan policy requiring a certain degree of biodiversity net gain on sites that are currently exempt from mandatory biodiversity net gain due to having a biodiversity value of zero? [Yes.](#)

3. Should we rely on mandatory requirements only, as set out in legislation? [No, because brownfield sites that have been cleared could slip through the net.](#)

4. Where would you like to see off-site provision targeted, if BNG cannot be provided on site? A habitat bank within Luton, or shaped by wider Local Nature Recovery Strategies? [See wider Central Beds LNRS, including Houghton Brook storage area and links to Chilterns and beyond Luton Hoo that could extend a River Lea linear park in the future.](#)

The LLFA supports BNG as it improves water quality, flood risk mitigation, amenity, sustainable drainage and can reduce the urban heat island effect.

Question 36

How can green and blue infrastructure in Luton be improved and enhanced? [More SuDS in areas of amenity during Town Centre redevelopment projects and any private developments.](#)

Options 1. Should we incorporate Natural England's green infrastructure framework principles and standards in a new Local Plan? (This includes: the urban greening factor, tree canopy cover, accessible green space, urban nature recovery, and green infrastructure standard). [Yes.](#)

2. Should a new Local Plan have a policy dedicated to the River Lea, including the promotion of the de-culverting and naturalisation of the river, along with the creation of a River Lea Linear Park? [Yes, this would help hugely to protect the corridor and reduce the building on the currently culverted sections.](#)

3. Given the competing uses for land, should we encourage the multifunctional uses of green infrastructure? Multi-functional uses could be: green spaces also reducing food risk by incorporating sustainable drainage, or providing recreation facilities, including carbon storage/sequestration (e.g. trees and marshland) and innovative renewable energy (e.g. pumped water storage) [Yes, the use of land is encouraged to be multi-functional wherever possible.](#)

4. Should a new Local Plan do more to protect green roadside verges? [Yes, please also speak with Highways. We want to be able to create more raingardens in green verges and protection of them is paramount to enabling green-blue infrastructure.](#)

Question 38

How can the Local Plan help to conserve and enhance Luton's natural environment?

Options 1. Should the Local Plan identify opportunities for the restoration or creation of new habitat areas in association with planned development to enhance the network conservation sites in the borough? [Yes, in consultation with Parks and Trevor Tween.](#)

2. Should we aim to increase tree cover throughout the borough? [Yes, as per Parks, 'the right tree in the right place'.](#) Trees mitigate flood risk and the urban heat island effect.

3. How can the Local Plan help to conserve and enhance Luton's natural environment, and achieve wider environmental gains? [Stronger policy to conserve what is good and improve/find betterment in what isn't.](#)