

Luton Council – Local Plan Regulation 18 Consultation Response by Paradigm Housing Group

Topic Heading: Developing our Vision and Objectives

Question Number: 2

Answer:

Paradigm support the five priority areas identified in the vision for Luton 2040, and recognise the crucial role that high quality, sustainable new developments will play in delivering this.

The themes share strong parallels with our own vision, which is to provide excellent services to customers, building new homes to help more people, make sure our homes are safe and sustainable and strive to do more by making the most of our resources.

Topic Heading: Developing our Vision and Objectives

Question Number: 3

Answer:

Paradigm support the ethos behind the 26 objectives listed. However, these would benefit from being grouped into thematic areas and/or simplified into a shorter, clearer set of objectives that can then be easily understood. Each objective should also state how success will be measured and monitored, along with the target timescale for achievement

Topic Heading: Developing our Vision and Objectives

Question Number: 4

Answer:

Paradigm support the proposal for the new Local Plan to cover a longer period through to 2045, as this should give greater certainty for developers and investors and facilitate ambitious long-term growth plans.

To maximise the long-term impact of the plan, it should set clear parameters for updating and adapting to change during the plan period, e.g. to government policy, Council leadership changes, and economic change,

Topic Heading: Developing our Vision and Objectives**Question Number: 5****Answer:**

In light of recent Government announcements regarding investment into the Oxford-Cambridge growth corridor, the Plan should set out how Luton will position itself to ensure it capitalises on opportunities for investment into the area, strengthening links to nearby towns and cities in the corridor including Bedford and Milton Keynes. Luton occupies a strategically significant location between the Oxford-Cambridge growth corridor and London, and must ensure this is recognised by policy-makers in Government.

On a similar basis, the Plan needs to recognise the potential for change following the recent Devolution White Paper, and the opportunities and challenges that may arise from the mooted alliance between Bedford Borough Council, Central Bedfordshire Council, Milton Keynes City Council and Luton Borough Council itself.

Finally, the Plan should be comprehensively updated to reflect the changes included in the latest version of the National Planning Policy Framework, many of which directly address areas discussed in the Plan.

Topic Heading: Providing suitable and sustainable homes**Question Number: 6****Answer:**

The recent changes to the National Planning Policy Framework set out a new Standard Method for calculating housing need. The Local Plan should therefore adopt this approach to ensure consistency and transparency, rather than referring to the 2023 NPPF as it currently does.

The location of new homes should also be guided by the provisions of the new NPPF, including the introduction of mandatory Green Belt reviews and the new category of grey belt. Strategic use of grey belt land should be considered to assist Luton in addressing the over-supply of smaller homes in town centre apartment-led developments.

Topic Heading: Providing suitable and sustainable homes

Question Number: 7

Answer:

There is an acute need for affordable housing with 11,000 households on the Council's housing register. Therefore, Paradigm strongly support increasing the provision of affordable housing above 20% of the overall development as currently required. Any future revision of this target should then be strictly enforced, to ensure the delivery of mixed communities. The Plan should also consider that any 'grey belt' sites brought forward will provide more than the final target (up to a cap of 50%).

Paradigm support the greater emphasis placed on the supply of Social Rent homes in the new NPPF and believe the new Local Plan should clearly articulate the need for Social Rent in line with the new Standard Method. We note the proposal to remove the requirement for First Homes in the NPPF and believe that Luton must therefore set a clear policy position on First Homes in the new Plan. As a leading provider of shared ownership homes, Paradigm support shared ownership as the most appropriate and affordable route to low-cost home ownership and believe it (along with Social Rent) should be prioritised for future delivery.

Topic Heading: Providing suitable and sustainable homes

Question Number: 8

Answer:

The future housing mix needs to directly address the identified local housing need and then confront the reality of available land supply in Luton. Given family homes are the stated priority, with an oversupply of smaller flats, then appropriate sites must be identified, and this may require a targeted review of Green Belt and grey belt sites.

Topic Heading: Providing suitable and sustainable homes

Question Number: 10

Answer:

Whilst we broadly support the concept of self-build and custom build, we have concerns that mandatory provision of these products may dilute the supply of much-needed affordable homes and adds complexity and delay to site delivery. Therefore, it may be preferable for these to be delivered on dedicated sites (similar to Graven Hill in Bicester)

Topic Heading: Providing suitable and sustainable homes

Question Number: 12

Answer:

Paradigm fully support policies enforcing the use of the Nationally Described Space Standards.

Strategic release of green and grey-belt land could also assist the Council in providing high-quality external amenity spaces and improved access to landscaped areas through the 'golden rules'.

Topic Heading: Providing suitable and sustainable homes

Question Number: 13

Answer:

Paradigm support the introduction of policies in the new Plan that require homes to meet M4(2) and M4(3) standards, as long as this is guided by evidenced need to ensure the right size and tenure of home.

There should also be measures in place to ensure alignment between Planning and Housing and to promote early partnership working between Luton and Registered Providers like Paradigm. This should commence pre-planning to ensure full co-ordination between planning drawings, planning conditions and S106 agreements to avoid situations where costly redesign work is required to meet standards where implications have not been fully considered. For example, understanding that a blanket insistence on all homes meeting M4(2) could result in unnecessary requirements for lifts, at prohibitive capital and operational cost, that could be designed out.

Topic Heading: Addressing and adapting to Climate Change

Question Number: 31

Answer:

Paradigm are strongly supportive of measures to address climate change, in line with our target of achieving net zero carbon emissions by 2050. We are also working to bring the majority of our homes up to EPC C standard by 2030. We are also reviewing our design standards to ensure compliance with the anticipated Future Homes Standard, which we believe should be adopted and promoted by Luton through the Plan.

We support the introduction of renewable and low-carbon energy, but urge caution on the adoption of district heating networks, which can prove problematic to landlords and residents through complexity, cost and lack of choice for the end user.

Topic Heading: Protecting and enhancing our natural environment**Question Number: 35****Answer:**

Paradigm believes the natural environment should be protected and enhanced to support nature recovery and biodiversity whenever possible. Given that Luton is in a predominantly built-up urban area, any opportunities to design nature back into developments should be maximised to support nature recovery. By increasing the requirements to 20% biodiversity on sites where it is shown to be viable, it will demonstrate a genuine attempt at nature recovery, providing wildlife corridors connecting nature through urban areas, and a host of health and wellbeing benefits to local communities. By going beyond the mandated requirements of legislation, we have the opportunity to design new homes with nature in mind, demonstrating that wildlife can co-exist with development.

Topic Heading: Placemaking and design**Question Number: 47****Answer:**

Paradigm supports the use of design codes through the new Plan, to ensure high-quality buildings and spaces that integrate into the fabric of the town. This should govern the types of materials to be used to ensure long-term ambitions are met. The Future Homes Standard should be adopted for all new-build homes, and Building for a Healthy Life should be incorporated into planning policies. We support the use of Design Review Panels, as long as there are clear parameters for how and when these will be used to ensure consistent decision-making.

Topic Heading: Placemaking and design**Question Number: 48****Answer:**

Paradigm do not develop tall buildings, preferring to focus our development pipeline on houses and low-rise apartment blocks. However, from a planning and design perspective, we are supportive of the Plan establishing a clear position on tall buildings to identify areas that can support tall buildings and to protect areas where other forms of development are more appropriate.

Controlling tall buildings in this way may then assist the Council in achieving its aims of rebalancing housing provision away from smaller flats in tall buildings, promoting more family housing to be developed. This may however require a strategic review of green and grey belt sites to ensure the availability of appropriate sites.

Topic Heading: Evidence for the Local Plan

Question Number: 58

Answer:

Paradigm believe that overall the evidence base used for the Local Plan is sound. However, it needs updating to reflect new the changes set out in the new NPPF and needs a lot more detail to be provided on what Luton are actually proposing, backed by evidence, rather than broad open questions. The potential impact of devolution should also be considered