

From: [Ethan Cameron](#)
To: [LBC Local Plan](#)
Cc: [Monika Jain](#); [Josephine Vos](#); [Shamal Ratnayaka](#)
Subject: RE: Reminder: A new Local Plan for Luton – help shape the future of our town - there's still time to have your say!
Date: 07 February 2025 17:00:49
Attachments: [image002.jpg](#)
[image003.png](#)
[image004.png](#)

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Dear Local Plan team,

Re: Luton Local Plan Review – Issues and options (Reg 18)

Thank you for consulting Transport for London (TfL). As the strategic transport authority for London we have an interest in cross boundary transport impacts, services and infrastructure as well as future projects. This includes a number the Transport for London Road Network (TLRN).

Connectivity and transport

We are encouraged to see that the focus of the consultation is around improving access to sustainable modes including walking, cycling and public transport. Given the wider regional context of population growth, new homes and jobs, growth in aviation and pressure on the road network from this growth, it is essential that additional journeys are made by active, efficient and sustainable modes.

As we have done in London, we think it would be worthwhile to set an ambitious mode share target through the local plan which developments should help achieve through their approach to transport. It additionally provides another policy hook to secure planning obligations to meet the strategic objectives of the plan. We note that Healthy Streets is mentioned in the context of public realm and design codes. We would also encourage this to feed through into the transport policies. We would strongly support Luton in adopting a Healthy Streets Approach, which need not just apply in London but anywhere.

Question 50 – How do you think we can improve bus services and provide for sustainable modes of transport?

Paragraph 5.254 rightly mentions that to change current travel patterns, high quality infrastructure for sustainable modes is essential. In the context of bus services, this will require road space reallocation from cars to bus priority. While this is most obviously done in the form of bus lanes, an ambitious approach to road space reallocation would also involve bus gates, bus signal priority and queue jumps at junctions which allow buses to be in front of other traffic. By reducing bus journey times, buses become a more attractive alternative to car use, improves connectivity and makes it easier and more attractive to develop vibrant, walkable development. As mentioned above, suitable policy hooks can be used to ensure developments contribute to bus operational costs or capital costs.

Question 51 – How do you think we can encourage more walking and cycling in Luton?

As with buses, high quality infrastructure across a network is essential for increasing active travel. Beyond having access to a car and parking, the main thing that dictates whether people choose to walk and cycle is if they feel safe and comfortable doing so. The plan could set out the desired strategic network of cycling routes and then require developments benefiting from this network to contribute towards its provision. Developments should prioritise people over vehicles in their design and ensure that vehicles do not dominate the public realm. For larger sites, it is beneficial to ensure that developments are permeable for people walking and cycling. Integrating a Healthy Streets approach to transport and public realm will also enable people to walk and cycle safely.

Question 52 – Do you have any views about parking in Luton?

A combination of providing attractive alternatives and demand management is essential to achieving mode shift. The most effective form of demand management that can be applied through planning policy is the approach to car parking provision in new developments, applying car parking maximums across the local authority area rather than car parking minimums. We note that the existing car parking policy states this in paragraph 11.8. We would encourage the Council to consider a greater level of ambition beyond that currently in Policy LLP32 – Parking. This could include maximums in areas which are less well-connected and removing conditions for allowing car-free development in well-connected areas. Given concerns around parking stress, this would likely need to be tied to implementing controlled parking zones where necessary, supported by planning obligations.

In terms of cross-boundary impacts, it would be helpful to understand what the flows of people travelling between Luton and London are and what modes they tend to use. Given provision of car parking is the number one indicator of whether people choose to drive rather than use sustainable modes, we would encourage the borough to take the approach outlined above in order to minimise the impacts on the Transport for London Road Network. The scale of growth being planned for in the Wider South East in light of the new National Planning Policy Framework, in our view, does raise the challenge of whether the road network can cope with that growth should car parking maximums not be applied in local authorities outside of Greater London.

Question 53 – What transport infrastructure should be provided and where [in relation to mobility hubs and the airport]

There are limits to what can reasonably be done in terms of additional infrastructure to reduce car mode share between Luton Airport and London. Given the introduction of the DART and fast EMR services to St. Pancras, Luton Airport is now one of the best connected airports in the Wider South East to central London. Our main concerns relate to airport trips coming from parts of London not on the Midland Mainline. Where infrastructure could link to the other radial national rail lines, that would potentially increase public transport mode share, but in all likelihood this will need to be provided through improved coach services.

In general however, we support the concept of mobility hubs and also refer to our above comments on bus, walking and cycling infrastructure. Taking a strategic approach to those will more widely offset the impacts of airport expansion and enable those working at the airport to travel there by sustainable modes.

Kind regards,

Ethan

Ethan Cameron | Principal City Planner

London Plan & Planning Obligations | Spatial Planning

Email: [REDACTED]



From: LBC Local Plan <LBClocalPlan@luton.gov.uk>

Sent: Friday, January 17, 2025 12:40 PM

To: LBC Local Plan <LBClocalPlan@luton.gov.uk>

Subject: Reminder: A new Local Plan for Luton – help shape the future of our town - there's still time to have your say!

Dear Consultee,

There is still time to have your say. We are asking for your views as we shape our new Local Plan for Luton. Our original letter is attached for your reference.

Please visit www.luton.gov.uk/newlocalplan to view the documents and make any comments if you have not already done so.

Please ensure that you submit your comments and any sites by **5pm on 7 February 2025**.

Come and speak to us at a public exhibition in Committee Room 3, at the Town Hall, Upper George Street, Luton LU1 2BQ on

Thursday 23 January 2025, from 10am to 5pm.

Yours sincerely

Local Plan Team

**Local Plan Team,
Sustainable Development,
Inclusive Growth,**

Luton Council, Town Hall, George Street, Luton, Beds LU1 2BQ



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