



Luton Borough Council
localplan@luton.gov.uk

7 February 2025

PUBLIC

Dear Sir or Madam,

RE: Luton Borough Council – New Local Plan Issues and Options consultation 2024-2025

I write on behalf of 2020 Developments (Luton) Limited and Luton Town Football Club (the Club), in response to the Luton Borough Council (LBC) Issues and Options consultation. This letter makes representations to the consultation in respect of the site of the Club’s new stadium at Power Court, which is subject to allocation LLP9 in the current Local Plan, 2017.

We also address the Club’s existing stadium and their training facility at The Brache.

Power Court

Existing Allocation

Policy LLP9 ‘Power Court’ of the Local Plan sets the strategic policy allocation for Power Court and considers the important development control issues that would need to be addressed by any application. The policy identifies Power Court as a key site for achieving regeneration objectives of the Plan, which includes providing a sustainable mixed use development, which will extend the primary shopping area to improve the town centre retail offer. The policy states that the site will deliver a mix of town centre uses, and lists the following uses as suitable: housing, convenience and comparison retail, leisure, cultural and entertainment uses and offices.

The policy further states that “Any scheme should include around 600 dwellings and a need for circa 3,393sqm net retail convenience floorspace.”

Policy LLP40 ‘Review of the Local Plan’ confirms that the Local Authority will bring forward a full review of the Plan. The provision for the relocation of the Club to a new home is identified as a specific matter to be addressed by the new Local Plan, as well as uses and policies relating to the strategic allocation at Power Court.

Site History

In 2019, outline consent was granted for the wider site for a mixed use development with a new football stadium for the Club at the heart of the scheme (LPA ref. 16/01400/OUTEIA). Planning permission was granted 24 September 2019. The consent was for major town centre regeneration, including the provision of a new football stadium for LTFC, up to 550 residential units and a range of town centre uses.

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A second application for outline consent was sought for the East and West ends to increase the amount of residential on site from 550 to 1,200 units. Consent was granted 1 September 2022 (20/01587/OUTEIA).

On 16 December 2024, members resolved to grant planning permission 24/01075/HYBEIA for a mixed use development on the central parcel of Power Court, comprising full consent for a new stadium with ancillary stadium related facilities, food and beverage facilities, commercial space and community facilities and outline consent for a music venue and hotel. The application will be granted when a Section 106 legal agreement is signed shortly.

Planning application ref. 24/00420/FUL for the realignment and opening up of the culverted River Lea was approved 6 February 2025.

When the Hybrid permission is granted, development will be commenced promptly, to be moved forwards alongside planning permission 20/01587/OUTEIA and 24/00420/FUL. 2020 Developments are undertaking active discussions with interested stakeholders with regards to bringing the residential development parcels forwards in the East and West ends of Power Court. Reserved Matters applications will be submitted pursuant to 20/01586/OUTEIA in the next few months.

Kenilworth Road and The Brache

Kenilworth Road is currently the home of the Club. The adopted Local Plan recognises the potential capacity of the site to deliver 59 homes and 7,500sqm of public open space, following the Club's move to their new stadium at Power Court. The Club's Training Ground and Academy facilities are housed at The Brache, which is currently identified on the Council's policies map as an Area of Great/Local Landscape Value (LLP 29).

National Government Objectives

The Labour Government has identified growth as one of their key objectives. This has so far manifested in the adopted amendments to the National Planning Policy Framework (NPPF), December 2024, which re-affirms mandatory housing targets and the need to deliver 1.5m homes within the Government's term. In addition to delivering housing, the Government is clear in its support for boosting productivity through investment in infrastructure and kickstarting economic growth, including through planning reforms, increasing investment, improving infrastructure, and supporting clean energy.

Representations

2020 Developments support the Council's intention to set a bold and ambitious vision for Luton, built around five key priorities, including building an inclusive economy that delivers investment, improving population wellbeing and tackling health inequalities, becoming a child friendly town, tackling the climate emergency and supporting a strong empowered community, built on fairness, local pride and powerful voice for all residents.

Power Court

As explained above, since the adoption of the Local Plan in 2017, the site's circumstances have changed considerably. Outline planning permission for a stadium led, mixed use development was approved in 2019, which established the use of Power Court as the future home for the Club. Further permission was approved for the East and West ends of the site to facilitate an uplift in



residential development at the site. Most recently, Councillors resolved to approve the Hybrid application for the stadium at the centre of the site, together with a music venue and hotel. The site will become a new leisure and residential quarter in the town centre, and play a key role in creating new public realm around the de-culverted River Lea, new homes and diversifying the leisure and entertainment offer in the town centre.

2020 Developments are committed to bringing forwards this important town centre site, and have commenced the challenging enabling works on site, which includes the site's remediation, ground works and relocation of the substation, to create a development platform for the site's redevelopment.

The next steps to the site's redevelopment will be to realign and open up the currently culverted River Lea, to allow the commencement of the stadium works. These works will commence as soon possible this year, following the formal grant of the relevant consents.

2020 Developments remain committed to delivering the residential elements on site, alongside the stadium. However, given the challenging economic headwinds, development and planning pressures the delivery of the new homes is very challenging. These challenges, therefore, need to be addressed so that the site's potential can be realised. The regeneration of Power Court will set a benchmark for values in Luton.

2020 Developments will continue seek solutions to these challenges, and welcome the Council's support in finding innovative ways to unlock development in the heart of Luton. The recent Government announcements demonstrate that the political will for development is strong. In this context, we note the similarities between the scheme at Power Court and the Government's support for the Old Trafford project, which the Government is backing as an example of their plans to drive regeneration and promote economic growth. The Old Trafford project has been identified as being a catalyst for major regeneration in an area that requires new investment to thrive again. We encourage the Council to explore avenues to assist in directing future Government funding towards investment in Luton. Given the gap between costs and value in Luton, this is likely to be the only way to bring the Council's vision to reality.

In policy terms, the Local Plan should update the site's allocation to explicitly reference the delivery of the new football stadium on the site. The mix of other town centre, community and commercial uses should also be amended to better reflect the planning permissions on site and allow for flexibility in the town centre to assist development. Finally, the residential capacity of the site allocation should also reflect the site's true development potential, as per the extant planning permission 20/01587/OUTEIA.

Kenilworth Road

Kenilworth Road is currently identified as having potential redevelopment capacity to deliver 59 new homes and open space. We request that, in addition, some form of appropriate sporting legacy is safeguarded to reflect the 125 years of history of Luton Town FC.

The Brache

The Club's training ground and academy at The Brache are important facilities to drive its success. Luton Town FC is a vital part of the town's image, and it is important to the Club that their training facilities remain in Luton.

The site is currently identified on the Council's policies map as an Area of Great/Local Landscape Value (LLP 29). We do not consider this designation is reflective of the site's use, and will inhibit potential expansion of the Club's facilities. To enable the Club to thrive, the current designation should be removed. We consider an allocation that supports the provision of sports and leisure facilities would be more appropriate and will help to demonstrate the importance of this key training facility and support the Club's long-term retention within the Borough.

The policies map currently also needs to be updated to reflect shows an outdated public safety zone, that does not London Luton Airport's (LLA) latest public safety zone (PSZ). It is important that the forthcoming Local Plan includes the up-to-date PSZ to assist with the determination of planning applications.

Wider opportunities

Having regard to the Council's vision, summarised above, we consider that the Local Plan could be bolder in creating new employment opportunities, and more proactive in terms of harnessing economic opportunities for investment, and to enhance the town's role as a place where residents can live, learn, work and play. Luton's strong history of manufacturing is recognised at section 5.43 of the Consultation document, noting that the town has historically been reliant on manufacturing, and whilst this remains an important sector, overtime it has declined with the loss of some important industries.

We believe that the Local Plan review presents an important opportunity to re-shape the future of Luton's workforce, to create and support a high-quality and high-skilled jobs, where residents, including future residents at Power Court and Kenilworth Road, can work locally. These new homes will attract young professionals commuting to London; but, this Local Plan provides a further opportunity to encourage the delivery of new jobs that can diversify Luton's economy, so that those living in Luton have increased employment opportunities. This will help reduce leakage of jobs to London and neighbouring towns.

This could be achieved is through the creation of an innovative and ambitious employment strategy, aimed at fulfilling the potential opportunities that unite Luton's unique position to connect to London and other global centres. For example, the Luton Rising Green Horizons Science and Innovation Park proposed by Luton Rising aims to be this catalyst to Luton's economic and employment success. However, 2020 Developments consider there is significant opportunity for development across a larger area of South Luton, on sites that span between Luton Airport Parkway and the LLA. If considered holistically, this could deliver significant economic benefits to Luton, beyond the current proposals for Green Horizons, and reshape the future resilience of Luton's economy. This is particularly important in light of the recent departure of Stellantis and the closure of Vauxhall in Luton, thus ending 120 years of vehicle production in the town.

The Council should seek to utilise the Local Plan as a tool to promote future economic productivity and develop a skilled workforce at this opportunity site to the north of the Airport. The adopted Local Plan currently identifies this area as a 'Category A Employment Area' under Policy LLP14, protecting the area for uses under Use Classes B1 (now E(g)), B2 and B8. However, this fails to

make the most of the opportunity to shape the site into a dynamic employment hub, that could attract more highly skilled workforce, beyond industrial and logistics, and which could also utilise the transferrable skills from the loss of Vauxhall.

In considering appropriate employment uses north of the Airport, the Council should look to airport adjacent and mixed-use regeneration schemes elsewhere, including Manchester Airport City, Bournemouth Aviation Park and the regeneration of the former MG Factory site at Longbridge, Birmingham. The Council should seek to leverage public-private partnerships and Government funding to secure the sustainable and resilient economic future for Luton, and drive regeneration and economic growth for the local community.

Alongside employment uses within Use Classes E(g), B2 and B8, we consider there is potential for a wider mix of uses, which may include education, residential, retail and leisure. Employment uses should seek to focus on providing new high-specification, industrial and office space, and space for life sciences and research and development, potentially for occupiers with links to the airport. To the east of the area, other high-value uses that are less dependent on public transport could also be appropriate.

Conclusion

The world and role of the UK has changed rapidly since the adoption of the current Local Plan in 2017. The world has become more dynamic and global markets are more inter-related. The development of technology and artificial intelligence (AI) will continue this trend. The new Local Plan must, therefore, be flexible and adaptable. The Council must support and encourage the redevelopment of strategic sites in Luton and ensure that policy does not unduly restrict or burden their development and delivery, or miss opportunities to grasp site potential. To achieve an ambitious future for Luton, the Council should:

1. Focus on attracting inward investment to Luton, and utilise the Government's growth agenda to attract investment and development, so that the image of Luton will be transformed. The development of Luton Town's iconic new stadium will influence national and international perceptions of the town;
2. Support new housing in the town centre and create vibrant and safe communities where people want to live and work; and
3. Encourage the creation of new jobs to secure the town's long term prosperity.

There has to be a realisation that improving well-being, tracking health inequalities, empowering the community will only happen if Luton's economy is buoyant. The economy is the bedrock on which a fairer, healthier and empowered population can be delivered.

Yours faithfully



Sean McGrath

CC Olivia St-Amour