

Luton Local Plan Review

Community Involvement Paper – Issues and Options

A new Local Plan for Luton
Planning for Luton's Future



(Regulation 18)
December 2024

Luton

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Chapter 1 - Introduction

What is the purpose of this consultation?



Welcome to Luton sign, Stockwood Park

- 1.1 We are producing a new Local Plan for Luton. This is a consultation document asking for your views as we shape our new Local Plan. It is the first in a number of documents we will be producing for public consultation.
- 1.2 It sets out what we think are the key issues and the current options for preparing the Local Plan. New issues may emerge and there may be other options we will need to consider as we take the Local Plan forward. Some of the options we have identified may also need to change. We are asking you to tell us what you think we have not considered at this stage so that we can make potential changes.
- 1.3 At the same time as consulting on this document, we are undertaking a 'call for sites', which will take place over the same

8 week period. We have also produced a booklet which is based on the document.

Why we need a new Local Plan for Luton

- 1.4 We have an [existing Local Plan](#) which was completed (adopted) in 2017. It provides a framework for growth and identifies sites for new housing, employment and other land uses. It also contains planning policies for determining planning applications. This Plan is now seven years old, government policy and legislation has changed and new issues have emerged. The new Local Plan will also help deliver our [Luton 2040 Vision](#).

How is a Local Plan produced?

- 1.5 A Local Plan is a land use or spatial plan that responds to issues and needs. It

must be informed by evidence, community engagement, and cooperation with partners and organisations. Our Local Plan will take about 4 years to produce and there are a number of key stages, which are outlined in Chapter 6. Preparation of a Local Plan must conform with legal requirements and national planning policy.

- 1.6** It will identify appropriate areas and sites for development, such as for new homes, offices, shops, and community facilities.
- 1.7** In preparing the new Plan we will be:
- Identifying the key issues that need to be addressed
 - Establishing the development needs that need to be met, including for new homes
 - Identifying sites to make sure we have a supply of land to meet needs
 - Identifying areas and proposals to bring about positive change in Luton
 - Ensuring that the necessary infrastructure is in place to serve new development
 - Working with our neighbours, expert advisors (such as the Environment Agency and Natural England) and infrastructure providers (such as water and energy providers) to ensure our strategy is appropriate and achievable
 - Listening to our residents, businesses and communities and working with local organisations.
- 1.8** When the Local Plan is completed (adopted) it will contain:
- A Vision for Luton and Plan Objectives
 - A strategy for achieving these
 - Land allocations for development where these are needed
 - Policies which will be used to assess new planning proposals
- 1.9** [Government planning policy](#) requires us to plan for a minimum of 15 years so that we can respond to long-term requirements and opportunities. We currently think our Local Plan should cover the period to 2045, which will allow the Local Plan to help deliver our 2040 Vision. However, we may need a Plan for a longer period depending on needs, our strategy and the developments we may propose.

The story so far

- 1.10** Work for the new Local Plan is at the early stages. We have been working across the council to understand the key issues for Luton and surroundings that need to be addressed. For the Local Plan we have started to engage and work with neighbouring and nearby local authorities and other stakeholders including Historic England and Natural England, and this will continue.
- 1.11** Working together and establishing partnerships, including with the voluntary sector, local businesses, health providers and other local organisations, will also be key in ensuring the Local Plan is effective for our communities. The development industry also has a key role to play in delivering the Local Plan. The collection of evidence and information to inform the Local Plan has also begun and we will publish this when it is completed. A list of evidence we plan to collect is provided at Appendix 2 of this document. Further information is contained in our Duty to Cooperate and Consultation Background Paper which sets out our early engagement.

How you can help us now

- 1.12** This is the first public consultation we have undertaken for the new Local Plan and the responses we receive will help shape our Plan. We want to ensure that a wide cross-section of views are obtained from across our communities, including from seldom heard groups such as young people.
- 1.13** At this stage we are consulting on:
- The issues that we have identified
 - A draft Vision and Objectives
 - Options to inform the creation of new policies
 - A 'Call for Sites'. We are asking the development industry, landowners and others to submit sites to us for consideration to potentially include in the Local Plan at the next stage. This will include nominations for local green space.
- 1.14** We have also published supporting documents including:

- A Sustainability Appraisal Scoping Report
- Initial Duty to Cooperate and Consultation Background Paper
- A draft Statement of Community Involvement (SCI).

1.15 We will use the comments we receive to prepare the next stage in the Local Plan process, which will be a draft Plan. We have included a number of questions in this document which we would like you to consider. There are headline questions and more detailed questions which form our Options.

1.16 We are undertaking this consultation over an 8 week period and Chapter 6 explains how your comments can be submitted and how you can continue to be involved at the later stages.

How this document is structured

1.17 The Issues and Options document sets out:

- The National Context: this includes current national planning policy, and proposed changes
- Luton and Beyond: this Chapter sets out information about Luton and the wider sub-region
- Vision and Objectives: our draft vision for Luton and the objectives that will help us achieve it
- Key Issues and Options: this covers key topics such as; housing, economic development, health and well being, transport and the natural environment
- Consultation Arrangements: this chapter explains how comments can be made.

Chapter 2 - National Context

The Planning System

- 2.1** The [National Planning Policy Framework \(2023\)](#) sets out the government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans can provide for sufficient housing and other development in a sustainable manner. The NPPF must be taken into account in preparing the Local Plan, and is a material consideration in planning decisions. A Local Plan must include strategic policies to address the local planning authority's priorities for the development and use of land in its area.
- 2.2** Neighbourhood Plans provide the opportunity for communities to shape, direct and help to deliver sustainable development. We do not have any completed (made) Neighbourhood Plans for Luton or any in the process of being produced.
- 2.3** In October 2023 under the previous government the Levelling Up and Regeneration Act ([LURA](#)) received Royal assent which provides for changes to the wider planning system. However, secondary legislation is required to bring this into force. The previous government also consulted on [proposals](#) to change the way Local Plans are produced.
- 2.4** In July 2024 the new government published an [updated National Planning Policy Framework \(NPPF\)](#) for consultation. The government has a target of building 1.5 million homes over the next 5 years. The government emphasises the important role of Local Plans in providing for growth and serving communities and how they should be produced as quickly as possible to ensure national coverage. Changes include the way affordable housing is provided, how housing needs are established, how Green Belt is defined and the role it could play in providing for housing needs. It explains that where it is necessary to release land from the Green Belt first consideration should be given to previously developed land in sustainable locations.
- 2.5** We will monitor any changes relevant to plan making that the new government sets out

and we may have to change the way we produce the Local Plan going forward. For example the government is proposing to take forward [the Planning & Infrastructure Bill](#). We have taken the proposed new NPPF and other government policy and aims into account for this document.

- 2.6** The Local Plan will also need to be informed by other government policy and legislation, such as the requirements of the [Environment Act \(2021\)](#). National Planning Practice Guidance ([PPG](#)) provides guidance on plan-making and other topics.

Duty to Cooperate

- 2.7** The Duty to Cooperate is a legal requirement and it requires local planning authorities to engage constructively, actively and on an ongoing basis with other local planning authorities, county councils and organisations in order to maximise the effectiveness of Planning documents in relation to strategic planning matters. This means, where needed, engaging with our neighbours (North Hertfordshire and Central Bedfordshire and others) on cross boundary matters such as housing and infrastructure. In this document we discuss where there are likely to be cross boundary matters to consider. Engagement is on-going with our neighbours and other bodies and evidence will be required to support any new proposals outside of Luton's boundaries. Further information is contained in our Duty to Cooperate Background Paper.
- 2.8** The proposed new NPPF explains how effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered and key spatial issues, including meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience, are addressed. There is also a requirement to consider the infrastructure plans of relevant organisations and providers.

Sustainability Appraisal and Habitats Regulations

- 2.9** The role of Sustainability Appraisal / Strategic Environmental Assessment ([SA / SEA](#)) is to promote sustainable development by assessing the likely social, economic and environmental effects of a Local Plan and considering these effects against reasonable alternatives. A SA / SEA Scoping Report has been produced alongside this document and comments on the report are welcome.
- 2.10** The previous government indicated their intention to replace SA / SEAs with Environmental Outcome Reports (EORs) as part of the wider reform of the planning system. Until the way forward is determined, we will continue to follow the SA / SEA process.
- 2.11** A Habitats Regulations Assessment ([HRA](#)) must be carried out when producing a Local Plan to see if the plan could significantly harm the designated features of a European Site. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites. A Habitats Regulation Assessment will be prepared at later stages in the Plan making process.

Chapter 3 - Luton Context

Luton today



Luton Town Hall

3.1 Luton is located in the east of England, 35 miles from central London. It has a population of 231,000 people. Nearby settlements include Milton Keynes, Bedford, Leighton Buzzard and Dunstable. The urban area of Luton comes up to its administrative boundary, with neighbouring authorities including North Hertfordshire and Central Bedfordshire. There are areas of Green Belt within its boundary and beyond. Surrounding Luton is mainly open countryside containing smaller settlements and the Chilterns National Landscape. The River Lea runs through the town.

3.2 It is an important strategic location, situated between London, Oxford and Cambridge with excellent connectivity to the wider region. Luton is part of a pan regional partnership which consists of leaders from local government, business boards, the Arc Universities Group and England's Economic Heartland for the Oxford to Cambridge region. Its aim is to accelerate economic opportunities created through the region's innovation strengths to achieve environmental enhancements and to unlock investment for inclusive, high quality sustainable development.

3.3 The town has three railway stations providing frequent services to London. London Luton airport is an international airport located immediately to the south east of the town. The Luton DART (Direct Air-Rail Transit) opened in 2023 and transfers passengers from Luton Airport Parkway station to the terminal in less than four minutes. The airport has submitted [proposals](#) to the government to increase passenger numbers to 32 million per year.

3.4 The M1 motorway runs to the west of the town providing an important link to London, the midlands and the north. There are a number of bus routes, including a guided bus way, providing links from areas of Luton to the town centre. It has a busy, vibrant town centre, with a range of shops, services, leisure opportunities and public space. Across the town are a range of parks, green open spaces and recreation facilities.



University of Bedfordshire

3.5 Luton is home to Luton and Dunstable University Hospital, providing core services to 500,000 people in the region. The University of Bedfordshire provides for higher education and offers a range of courses alongside a number of local schools and colleges, many of which are rated as 'outstanding' or 'good'.

3.6 There is a mix of housing stock from Victorian terraced housing through to newer homes, including some high rise development. Despite some losses over the last few years, traditional industries remain in the town and new employment development is coming forward, providing new job opportunities. The town has been the number one location for new job creation in the last 12 years.



Luton Airport

3.7 Exciting new developments are in the pipeline. 'The Stage' will provide new homes, a multi-purpose performance and community facilities, food court and commercial space, and there are plans for a new football ground for Luton Town football club. The wider council also has a series of strategies, projects and initiatives in place or in the pipeline, including a new Economic Growth Strategy and new Local Transport Plan, which will help deliver the [2040 Vision](#) for Luton.

3.8 Luton is a modern, diverse town with a vibrant mix of cultures, skills and languages. It has the third youngest population in the country with 22% of residents below the age of 15. There is a growing arts, culture and heritage offer with events and developments that celebrate our diverse population and history such as the Vauxhall Heritage exhibition and restored hat factories.

3.9 Luton however faces some significant issues and challenges, many of which we aim to set out and consult on in this document and which are highlighted in our 2040 Vision and other strategies. The population of Luton often has worse health outcomes than the national average and there is a lack of skills in some sectors. There are instances of anti-social behaviour and crime including in the town centre which is detracting from creating a place that people want to visit.

3.10 We have an ageing population, some people are living in poor quality housing, there are empty homes, housing needs are not always being met and in places our urban, natural and historic environment requires protection and improvement. Luton is built up to its boundaries, there are areas of traffic congestion, new infrastructure is required and achieving high quality developments can be challenging in the face of difficult financial conditions.

3.11 New development can lead to pressures on local services and infrastructure. As well as the opportunity it provides and the needs it helps address, the impacts of planned development outside Luton's boundaries also needs to be carefully considered.

Question 1

Is there anything you consider important we have not mentioned about Luton and its surroundings?

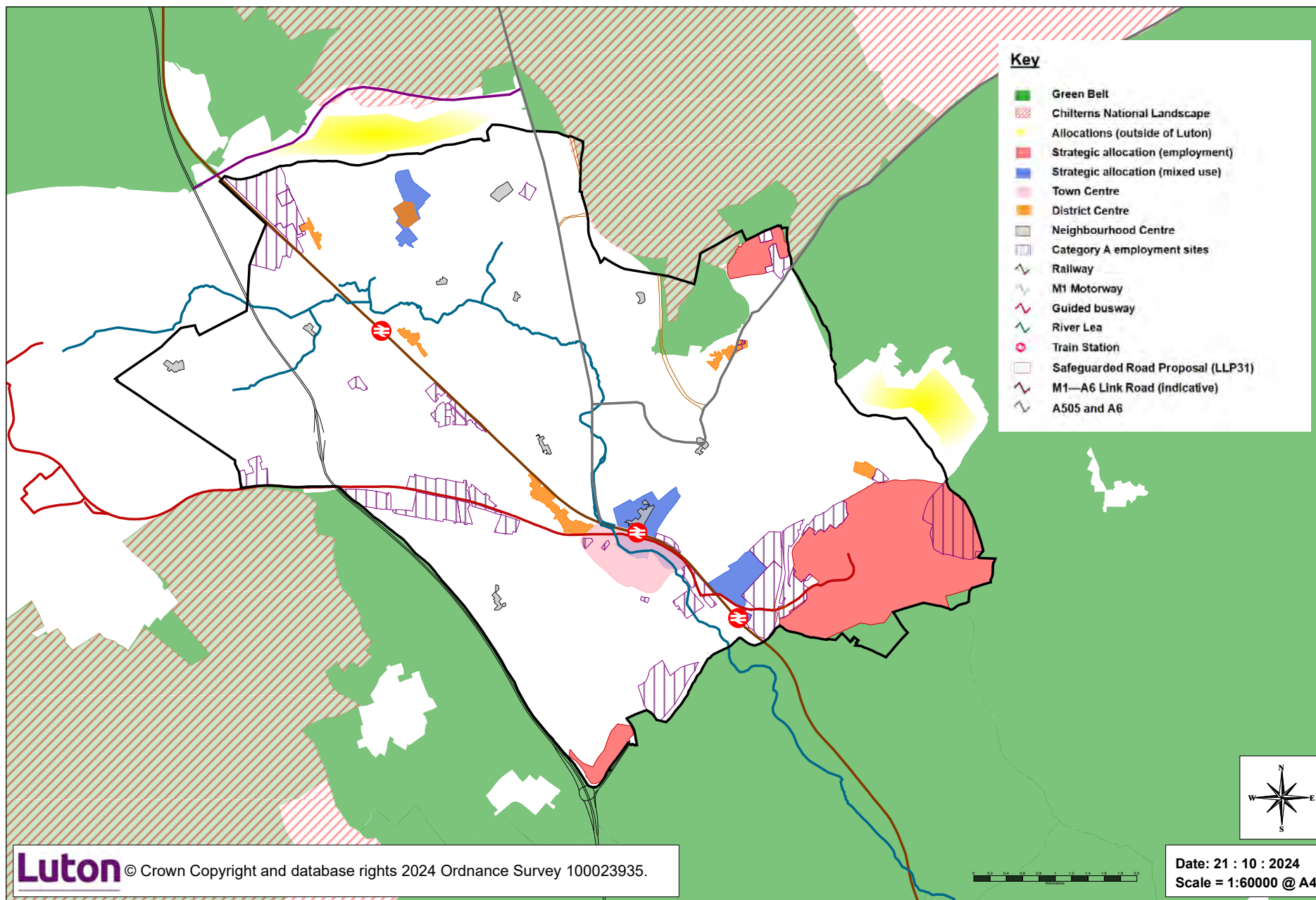
Our current strategy

3.12 The current [Luton Local Plan](#) was adopted in 2017. It contains a strategy and identifies strategic development sites across the town and supporting infrastructure. Its policies seek to meet local needs as well as protecting areas from inappropriate development. Housing needs were accommodated through the Local Plan, however Luton could not meet all of its needs within its boundaries. Local Plans for [North Hertfordshire \(adopted 2022\)](#) and [Central Bedfordshire \(adopted 2021\)](#), which are recently adopted, seek to meet this unmet need through the allocation of strategic sites in their authority areas.

3.13 Sites identified within our Local Plan have come forward for new development and others remain undeveloped. The Plan

period is to 2031 and the current Local Plan will continue to be used in the determination of planning applications before the new Local Plan is adopted. Some of the existing policies in the Local Plan could be saved (carried forward to the new Local Plan). At the next stage in the Local Plan process we will be setting out any policies that we propose to save.

- 3.14** The council carries out minerals and waste policy planning jointly with Bedford Borough and Central Bedfordshire Councils. [The Minerals and Waste Local Plan \(2014\)](#) identifies strategic sites for mineral extraction, non-hazardous waste landfill and other waste management activities. Working with our neighbours, we will be exploring how planning for minerals and waste is taken forward as the Local Plan progresses.
- 3.15** We have produced a number of [planning policy documents](#), including a [Luton Town Centre Design Guide SPD \(2023\)](#) and [Luton Town Centre Masterplan Framework \(2021\)](#), which build on policies in the Local Plan.
- 3.16** The map below shows some of Luton's key designations, development areas and existing and planned infrastructure. Further information is provided on the current [Local Plan Policies Map \(2017\)](#).



Chapter 4 - Vision and Objectives

Luton 2040 Vision



Approach to town centre from train station

- 4.1** In 2022 the council, with partners, launched a vision for Luton. Our vision for Luton in **2040** is a bold and ambitious one - a healthy, fair, and sustainable town where everyone can thrive, and no one has to live in poverty.
- 4.2** The vision is built around five priorities, each of which contributes to achieving our overall vision for the town:
1. Building an inclusive economy that delivers investment to support the growth of businesses, jobs and incomes
 2. Improving population wellbeing and tackling health inequalities to enable everyone to have a good quality of life and reach their full potential
 3. Becoming a child friendly town, where our children grow up happy, healthy and secure, with a voice that matters and the opportunities they need to thrive
 4. Tackling the climate emergency and becoming a net zero town with sustainable growth and a healthier environment
 5. Supporting a strong and empowered community, built on fairness, local pride and a powerful voice for all our residents.
- 4.3** Since launching the vision, partners across Luton have also been transforming the town with a series of projects and initiatives.

Developing our Vision



Picture Mural Mural in Plaiters' Lea conservation area

- 4.4** The [NPPF \(2023\)](#) explains that up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings. The purpose of the Vision for the Local Plan is to set out what Luton might look like in 15 years time or more. This Vision, along with our objectives, will build on and help deliver the council's overall Luton 2040 vision.

Question 2

What do you think of our draft Vision?

- 4.5** Our draft Vision for the Local Plan is as follows:

Vision

A transformed town which enhances its existing social, environmental and economic assets and delivers our 2040 Vision. Where high quality, sustainable new developments, regenerate and re-shape our town centre and wider urban area, providing new homes, jobs and an environment where companies want to invest. Where effective infrastructure is provided to facilitate growth and enable sustainable travel. Where accessible community facilities, services and open spaces are provided and natural and historic environments are preserved and enhanced, continuing efforts to improve life outcomes and creating a place where people want to live, work and stay.

Developing our Objectives

- 4.6** We also need to establish objectives for the Local Plan. The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. There are three overarching objectives in the NPPF for achieving sustainable development and these should be delivered through the preparation and implementation of plans.
- 4.7** Our objectives will guide our policy making for the borough as a whole and future planning policies in our draft Local Plan which will add more detailed requirements. We consider that the following draft objectives would deliver our Vision and guide development over the Plan period. Our final objectives will take account of the feedback we receive from this consultation.

Question 3

What do you think of our draft Objectives?

Objectives

1. Putting the delivery of Luton 2040 at the heart of planning decisions
2. Identify sufficient land in sustainable locations to meet needs and enable sustainable sites to come forward to encourage regeneration and renewal
3. Provide for a range of high quality, energy efficient new homes, including adaptable housing, homes to meet specialist needs and affordable homes, focusing on social rented homes
4. Provide for the needs of Gypsy and Travellers and Travelling Showpeople in suitable and sustainable locations
5. Create sustainable, well-designed, safe, inclusive, mixed communities, with access to services and facilities in order to help address poverty, including child poverty and improve health outcomes
6. Create an inclusive and accessible urban environment in order to help tackle crime and anti-social behaviour and encourage social interaction and activity
7. Explore the opportunity to utilise public sector land, assets and delivery mechanisms to help unlock sites, particularly for new affordable homes
8. Allocate sufficient land and enable sustainable sites to come forward to meet our needs including for housing and employment
9. Raise the value and productivity of the local economy, encourage high value jobs, and support the growth of all types of employment, particularly high-tech, emerging and growth sectors such as AI and support digital connectivity across the town
10. Provide for education needs, including working with the University and colleges to raise the level of skills and ensure that local companies invest in the local workforce, embedding social value
11. Ensure Luton remains competitive and attractive to business investment and innovation and as a place to live and work
12. Encourage visitors, including those using the airport, to stay in the town, use leisure and cultural facilities and visit surrounding open spaces, landscapes and attractions
13. Ensure that new developments enable improvements in health and wellbeing and life outcomes, including through the provision of new open space, improvements to the built environment and opportunities for active travel
14. Maintain and improve the vibrancy, vitality and viability of our town centre, shopping areas and local centres, facilitate urban renewal, encourage healthy food opportunities, and allow for a range of shops and leisure destinations to promote activity and an inclusive night time economy
15. Promote net zero carbon developments, with high sustainable construction standards and low embodied carbon, to ensure new developments deliver the highest viable energy efficiency, including the use of decentralised energy
16. Ensure the efficient use of resources and support a local zero-carbon energy system that reduces Luton's reliance on global fossil fuels and prioritises community energy
17. Deliver developments that minimise and are resilient to the impacts of climate change, including extreme weather events such as flooding, increased rainfall, drought and heatwaves and improve air quality
18. Protect and maximise opportunities for biodiversity net gain and the enhancement of Luton's natural assets
19. Protect and enhance the natural environment, including open spaces, landscapes, green infrastructure and waterways, provide a linear park for the town, and minimise pollution

20. Provide sufficient accessible, well maintained good quality services, facilities and infrastructure, to meet health, education, transport, open space, sport, recreation, cultural, social and other community needs
21. Recognise and celebrate the importance of Luton's history and its historic assets and conserve and enhance its historic environment including its conservation areas, listed buildings and cultural assets, and encourage the effective re-use of historic buildings
22. Promote good design, including of new buildings, conversions, and public spaces, and allow innovative design solutions, including taller buildings in appropriate locations
23. Improve the amenity and function of our existing neighbourhoods, including addressing parking issues
24. Prioritise active travel and increase the attraction of, and opportunities for public transport, ensuring high standards of connectivity and accessibility to services for all
25. Reduce dependency on the private car as a mode of travel, facilitating the creation of a net-zero-carbon transport network and secure improvements to transport infrastructure
26. Work with our partners to coordinate the identification and provision of infrastructure to support a productive sustainable economy and the provision of new homes.

Our Strategy

- 4.8** We currently think our Local Plan could cover the period to 2045. We will need to form a strategy for the new Local Plan at the next stage which will set out the overall pattern and scale of development proposed. Later in this document we discuss options for how sites for particular uses, such as housing and employment, could be identified.

Question 4

What period do you think our Local Plan should cover?

Question 5

Do you have any views on what our future strategy should look like, where we should identify new sites for development and what factors and information we should consider?

Chapter 5 - Issues and Options for Luton

Providing Suitable and Sustainable homes



New housing development, All Saints Close

Housing Location and Delivery

- 5.1** The council is determined to improve the quality of Luton's homes and provide more social housing. A key target for our [2040 Vision](#) is that more Luton households will live in good quality and affordable homes. [Luton's Housing Strategy \(2022\)](#) builds on this and explains how it seeks to ensure a good mix of homes is available to people in Luton which meet local needs.
- 5.2** Providing for housing needs in Luton is a significant challenge when the town is built up to its boundaries and there are limited sites available. The financial cost of building on previously developed land and the impact on the viability of urban sites means that delivering high quality homes that provide for Luton's needs can be difficult to achieve.
- 5.3** The current [Local Plan \(adopted 2017\)](#) set out how housing needs identified in the 2018 Strategic Housing Market Assessment ([SHMA](#)) could be accommodated in Luton, however Luton could not meet all of its needs within its boundaries. Local Plans for North Hertfordshire and Central Bedfordshire seek to meet this unmet need through the identification of sites in their authority areas. The site east of Luton, in North Hertfordshire, and sites in Central Bedfordshire have yet to come forward. We continue to work with our neighbours, including to try to ensure development proposals are well connected to Luton and the necessary infrastructure is in place, and the developers of the east of Luton site are developing a masterplan which adds detail to the Local Plan policy.
- 5.4** The current Local Plan target is to deliver 8,500 homes (425 homes annually) in Luton over a 20 year period. Our latest [2022-2023 Authority Monitoring Report \(AMR\)](#) shows that between 2011 and 2023 just over

7,000 new homes were completed, an over delivery against the target. However these are mainly smaller flats, with over 60% of new homes delivered consisting of 1 bedroom flats. This is inconsistent with the need identified in the SHMA of 1%.

- 5.5** Sites identified for housing in the current Local Plan include a mix of previously developed and greenfield land. Strategic sites include Napier Park, Power Court, High Town, Creative Quarter and Marsh Farm. Some sites have been delivered or are in the process of being built and others have yet to come forward. Other sites in the town have been developed which were not identified in the Local Plan, known as windfall sites. We have provided updated information on our land supply which is available on our website. Further information is provided in our latest Authority Monitoring Report.
- 5.6** The [NPPF \(2023\)](#) requires us to establish our housing needs. It requires us to calculate this using the government's standard method, with some exceptions. We will be producing evidence to establish our housing needs including examining the type and mix of new homes needed. Using the government's current standard method for calculating housing need means that Luton's housing needs are currently 1,463 homes per year.
- 5.7** We will also be exploring the capacity of Luton and the availability and deliverability of sites for new homes within the borough. In line with our draft Vision and Objectives, we would like to regenerate our urban area, including through the provision of new homes. However, it is possible that we will not be able to meet Luton's housing needs within the borough and we may need to ask neighbouring authorities to accommodate some of our housing needs through the Local Plan process.
- 5.8** In recent years some of our industrial land, offices, commercial buildings and car parks have been redeveloped for new homes, many as conversions through the use of permitted development rights. This will likely continue to provide a source of new homes, however there could be a risk that this leads to a significant loss of employment opportunities and threatens the viability and vitality of our town centre.
- 5.9** There are also issues around the quality and the small size of some new homes which do not provide for a satisfactory living environment. There are a number of empty homes in Luton which can fall into disrepair and detract from the appearance of our neighbourhoods. The council's [Empty Homes Strategy \(2015\)](#) seeks to develop and implement a range of measures that will help return long-term private sector homes back into use.
- 5.10** Luton has a range of parks and other green spaces, some which may not be being used to their full potential. Planning policy requires that these areas are protected, however there could be an opportunity to provide new homes in some limited circumstances, for example through land swaps and providing improved open space and recreation facilities elsewhere.
- 5.11** The council owns and manages a number of sites and buildings in Luton and delivers new homes, including affordable homes, both itself and through its wholly owned housing company, Foxhall Homes. Despite viability challenges, there may be continuing opportunities to use council owned sites and delivery mechanisms, to bring forward new homes in the town. Separately, councils can compulsory purchase land if this can be justified.
- 5.12** Our future planning policies will need to establish our housing needs, supply and Plan requirement, determine where new homes should be located and identify sustainable and deliverable sites. There are options for how this could be achieved.

Question 6

How should we establish the number of homes we need to plan for and where should new homes be located?

Options

1. Should we evidence test the robustness of the Standard Housing Methodology, and if so, how?
2. How should we determine our housing needs, supply and plan requirement?
3. Would an urban capacity study in Luton identify any new land, previously developed land or older industrial land that could meet needs? If so, where?
4. How should the Local Plan balance the needs for housing and employment and how should existing employment land and sites be protected?
5. Should we develop greenfield sites and/or other green spaces within Luton? If so, where?
6. Is there scope for further urban regeneration opportunities around the town to address underuse or inefficient use of land?
7. Should the new Local Plan seek to increase densities and/or build upwards, including more taller buildings? If so, where?
8. Should the new plan seek to regenerate or re-shape older/existing housing, for example through densification and/or adding additional storeys and how could any disadvantages be mitigated?
9. Should we focus on the re-use of existing suitable buildings and bringing empty homes back into use?
10. Is there scope to use employment land and sites within the town to contribute towards housing needs?
11. How can we use council owned land and delivery mechanisms/models to deliver new homes?
12. How should we ensure that the housing needs of local people are met including considering the town's particular population and demographic characteristics?
13. Should the council consider the compulsory purchase of land to secure the delivery of new homes?
14. What information should we consider when determining which areas and sites should be identified in the Local Plan for new homes?
15. What role should small sites and windfalls play in meeting housing needs?
16. If it is found that Luton cannot accommodate its identified housing needs within Luton how could these needs be accommodated?
17. If required, what factors and information should be considered in relation to any new development located outside Luton's boundaries?
18. Is there likely to be any scope for using 'Grey Belt' land or Green Belt land in exceptional circumstances for new homes?
19. How can we ensure that existing planned development outside Luton's boundaries to meet Luton's housing needs is supported by facilities and infrastructure and can be fully integrated sustainably with Luton and become Luton focussed?
20. What is the most effective way to ensure that cross boundary nomination rights secure Luton's affordable housing requirements and provision for families on the waiting list, for example on the east of Luton site?

Affordable Housing

5.13 There is a significant need for affordable housing in Luton. House prices and rental costs have continued to rise, meaning it is difficult for people to afford to buy or rent a home. In Luton the average house price increased by more than £50,000 between 2015 and 2023. The median house price in

the town is nine times the median annual earnings, putting home ownership out of reach for many residents.

5.14 There are high levels of overcrowding and homelessness in Luton. In 2023/24 there were over 6,000 presentations of homelessness. Four thousand

residents are estimated to be experiencing unsatisfactory housing conditions, a number which has doubled since 2013. There were over 1,000 households in temporary accommodation, which is almost five times higher than the average for England and just over seven times higher than the East of England average.

- 5.15** There are over 11,000 households waiting for housing on the council's register and this is likely to increase with the population growing and migration into the town. Two-thirds of these households require two or more bedrooms, for example for one or two adults with children, or multi-generational households.
- 5.16** Many developments are not providing the affordable housing required by the current Local Plan policy, which requires the provision of 20% affordable housing units on developments that deliver a net gain of at least 11 dwellings and on sites of 10 dwellings or less that have a combined floorspace of more than 1,000sq.m. The affordable housing that has been delivered is mainly on schemes where 100% of the homes were proposed to be affordable and often delivered by the council. The council's Authority Monitoring Reports provide further information.
- 5.17** The council's [Affordable Housing SPD \(2020\)](#) explains how for many local families only affordable housing secured through social landlords provides a realistic long-term option for a home at a manageable price. The SPD sets out how the council will aim to deliver and enable others to deliver, a range of affordable housing across the town to meet the significant need for stable, affordable accommodation, especially at larger house sizes. It requires that affordable homes are provided on site and explains how new council homes are capped at Local Housing Allowance (LHA) rates to retain affordability. The council's housing team is responsible for how affordable/social housing is allocated, in line with national guidance.
- 5.18** The government's priority is to diversify the supply of homes and enable the delivery of affordable homes. The NPPF provides a definition of affordable housing as housing for sale or rent, for those whose needs are

not met by the market, including housing that provides a subsidised route to home ownership and/or is for essential local workers. The glossary of the NPPF provides further definitions including for Build to Rent schemes which will usually offer longer tenancy agreements of three years or more.

- 5.19** There are a number of ways that affordable homes can be delivered. 'First Homes' are a specific kind of discounted market sale housing designed for first time buyers. Planning practice guidance explains that they should account for at least 25% of all affordable housing units delivered by developers through planning obligations.
- 5.20** Through the [proposed changes to the NPPF \(2024\)](#) the government sets out their priority for boosting the provision of social rented homes and an expectation that policies specify the proportion of social rented housing provided. It is also proposed that the above requirement for First Homes is removed but it remains a type of affordable housing and an option for delivery where local planning authorities judge this to be appropriate for local needs. Our planning policies will need to provide for affordable housing needs and through the collection of evidence we will need to confirm the type and tenure of affordable housing needed.

Question 7

How can we provide affordable housing for Luton and what information should we consider?

Options

1. Should the new plan seek to increase Luton's affordable homes target above 20%?
2. Should there be a threshold which means that only developments over a certain size provide affordable housing?
3. Should we vary the affordable housing target and/or threshold, depending on the type and/or size of new homes proposed and/or their location? - Could obligations for family homes be reduced?
4. Should the tenure/mix required secure more social rented and family housing?
5. Should the Local Plan encourage and enable particular forms of low cost home ownership within its affordable housing policies?
6. Are there any circumstances where affordable homes should not be provided on site?
7. Should we require affordable homes to be provided for certain groups such as key workers and local people first and on which type of schemes?
8. What approach should we take towards proposals for student accommodation?
9. What should the new plan do to help tackle homelessness and rough sleeping and the need for temporary accommodation with basic amenity and support services?
10. What other ways are there to ensure that we deliver affordable homes in Luton, for example co-living schemes?

Private Rented Housing

- 5.21** In the UK, the private rental sector has the lowest quality housing of any sector, with 23% of homes considered as not meeting the minimum standards of quality. Luton has a higher proportion of residents privately renting than the UK average. [Luton's Corporate Performance Report Year End 2023-24](#) shows that 29% of homes are rented privately in Luton, which is twice the amount of social rented homes. Private rents rose to an average of £1,111 in August 2024, an annual increase of 10.3% from

£1,007 in August 2023. This was higher than the rise in the East of England (7.6%) over the year.

- 5.22** The private rented sector makes a significant contribution toward meeting housing needs. However, the report [Reducing Health Inequalities in Luton: a Marmot Town \(2022\)](#), published for Luton by the Institute for Health Equity, highlighted the prevalence of rented homes along with temporary accommodation, poor quality housing and cold homes, as significantly impacting on wellbeing in Luton.

Options

1. How can the Local Plan help improve the quality of housing provided through the private rented sector?

Housing Mix

- 5.23** The high proportion of smaller flats being provided in Luton is inconsistent with identified needs, which is for larger, family homes. However, nationally the number of smaller households continues to increase as more people live alone, and smaller homes can be more affordable.
- 5.24** Our policies will need to provide for an appropriate mix of new homes to enable households to more easily find and move to housing they can afford and that best suits their circumstances. Providing for a mix of homes and helping to increase affordability could also include building modular homes, which are homes where sections are constructed at a factory and transported to the development site rather than being constructed on site.



New housing development, Kimpton Road

- 5.25** More people are working from home and setting up businesses in their homes since the Covid-19 pandemic and this trend is likely to continue. We could have planning policies which encourage live work/units to cater for home working, potentially reducing the need to travel and help foster innovation and create vibrant communities.

Question 8

Thinking about type and size, what mix of homes should be provided?

Options

1. Should we have planning policies which specify the mix of new homes required? If so, how could this be provided and what information should we consider in determining the mix?
2. Should the Local Plan resist the loss of family homes by ensuring that applications for houses to be converted to flats re-provide at least one family sized flat within the final converted dwelling?
3. What other criteria should we consider introducing to resist the loss of family homes?
4. Should we vary and specify the type and mix of houses in different areas of Luton?
5. Should we require live work/units to be provided and where could

these be located to avoid impacts on local amenity?

6. Is there scope for providing modular homes or using different materials to reduce build costs and assist with affordability and sustainability?

Sub-division and HMOs

- 5.26** Luton's Housing Strategy (2022) shows there are approximately 400 HMOs that are licensed. With high house prices and the significant need for affordable homes in Luton, the conversion of existing housing to flats and shared accommodation makes an important contribution to the housing stock and meeting housing needs. However, sub-division can have negative impacts on amenity due to the increased occupancy that normally results from sub-division. The design and/or location of some residential areas within the town has led to houses in these areas attracting higher levels of sub-division leading to parking and bin storage issues, traffic congestion, and loss of local character. The council conducts enforcement work with the aim of ensuring good quality homes, including HMOs. The potential for expanding licensing requirements for HMOs is being explored.

- 5.27** Planning policy has limited control over small HMOs. Planning permission is normally required for the sub-division of a building used as a house for use as two or more separate houses. However, permission is not required when converting from a house or flat to form a HMO property which is a shared house of up to six unrelated people. There is a policy in the current Local Plan (Policy LLP17) for HMOs.

Question 9

What approach should we take to HMOs in Luton?

Options

1. Should we introduce policies that control HMOs if there is evidence of harm to local amenity (e.g. on street parking, litter/bins, crime, noise and antisocial behaviour)?
2. Where it can, should the new Plan seek to control and regulate changes of use and conversions for single bedroom accommodation, for example limiting the number of HMOs in a particular area?
3. Should we address a need for shared accommodation through planning for specifically designed areas or buildings for shared accommodation as part of new developments?

Specialist Housing

5.29 The need to provide housing for those with specialist needs is critical. People are living longer and the proportion of older people in the population is increasing. The older adult population in Luton is expected to increase significantly over the next 20 years. [Luton's Market Sustainability Plan 2023-2026](#) identifies that there is currently a sufficient supply of care home places to meet current needs considering the council's plan to increase support for home-based care for people aged 65 and older. However, the report identifies a need to increase the provision of care home beds with nursing, particularly for people with dementia or complex care needs. Luton's Housing Strategy references work for the BLMK Transforming Care Partnership which identified an additional demand for specialist accommodation in Luton for people with learning disabilities; primarily supported housing and it highlights a need for specialist homes, comprising age exclusive, sheltered and extra care homes.

5.30 The Luton Housing Strategy seeks to publish action plans setting out how sites near to community facilities will be identified for the delivery of specialist accommodation that meets the diversity of specialist needs. For example, provision for people with learning disabilities and autism, young people transitioning from Children's Services, people with mental health and complex needs, and older people.

5.31 The new Local Plan will need to consider demand over at least a 15 year period and how different types of specialist housing can be provided in Luton, including for people with learning disabilities, with physical disabilities and for vulnerable young people, including young parents. Extra care housing in particular will be important in meeting the housing needs of an older population and others. Providing specialist forms of housing also provides an opportunity to 'free up' family sized homes. Our current Local Plan contains a policy (Policy LLP 18) for existing and new older people's housing.

Self-build and Custom Build Homes

5.28 Self-build and custom building is where people build or commission their own homes. It allows people to develop their own affordable and sustainable housing, learn construction skills and it can help diversify the housing market and provide for innovative design. Projects can also include and involve community led housing, such as co-housing, community land trusts and community self-build. Local authorities maintain a register for residents interested in seeking plots for self-build and custom build projects.

Question 10

Should we further encourage people to build their own home and if so how?

Options

1. Is there scope for self-build and community-led housing to help meet local housing need in a town where there is very limited supply of land which is likely to be previously developed?
2. Should the council allocate land for self-build, custom-build and community-led housing, and if so where? Could this be within new development sites?

Question 11

How should we provide housing for older people and those with specialist needs?

Options

1. How and where can the Local Plan best provide for specialist housing, including for the elderly, people with disabilities and vulnerable people and how should these be provided for in new developments?

Space Standards

- 5.32** Internal space within new homes is an important factor in creating homes that support well-being and allow households to meet their current needs whilst also being flexible enough to accommodate changes in peoples circumstances. Some development has occurred in Luton resulting in inappropriately sized homes and rooms. In 2015 the government published [Nationally Described Space Standards](#) (NDSS) which provide minimum standards for internal space within new homes.
- 5.33** Outdoor amenity space, including private gardens, can make an important contribution to improving the quality of life and well-being of residents, supporting and enhancing local biodiversity, moderating temperature, and assisting with flood prevention. Gardens provide a semi-natural habitat supporting a range of species and corridors for movement of wildlife through the local environment. Sufficiently sized outside areas can provide opportunities for play and storage.
- 5.34** The current Local Plan does not include policies on internal space standards, although Policy 16 Affordable Housing clause C, requires that new development provide the size, type and tenure of affordable homes that meet the housing need of the local area and Homes & Communities Agency (now Homes England) space standards. In addition Policy LLP25 includes external amenity space standards for new housing, set out in an Appendix 6 (e.g. gardens and communal

areas). There is a policy (Policy LLP 19) for household extensions, including annexes.

Question 12

What should we consider in ensuring that new homes and outside spaces are the right size?

Options

1. Considering the need for family housing and housing that is adaptable for lifetime, should the new plan introduce a policy requiring all new homes to meet the nationally described space standards, and if so, should this be a minimum requirement? What evidence would we need?
2. Should there be more flexible consideration of house extensions to meet family needs and changing lifestyles?

Accessible and Adaptable Homes

- 5.35** An ageing population is likely to coincide with an increase in the number of people with disabilities and health related concerns, so it is important that we plan for homes that meet their needs. We also need to ensure that housing is accessible to those of any age with disabilities and specialist needs. [Building Regulations 2010: Access to and use of buildings - Approved Document M \(2015 incorporating 2016 amendments\)](#) set out three categories that define the level of provision for accessible housing in new development:
- M4(1) Category 1 – Visitable dwellings (mandatory)
 - M4(2) Category 2 – Accessible and adaptable dwellings (optional)
 - M4(3) Category 3 – Wheelchair user dwellings (optional).
- 5.36** Luton's Housing Strategy indicates that there is a need for a minimum 10% of new affordable homes to be M4(3) wheelchair accessible. The council has an ambition to see all homes designed to Category M4(2). The Local Plan provides an opportunity to establish future requirements.

5.37 Following its [consultation](#) in 2020 on raising accessibility standards for new homes, in 2022 the previous government set out its intentions to mandate Category M4(2) as the minimum standard for all new homes, except in exceptional circumstances and planned to implement the requirement through changes to the building regulations. Category M4(3) was proposed not be mandated in building regulations but the requirement could be included in local planning policy based on evidence. Evidence on the need for accessible homes will be collected for the Local Plan. Habinteg Housing Association and the Centre for Accessible Environments (CAE), with publishers the Royal Institute of British Architects (RIBA) published an [Inclusive Housing Design Guide \(2024\)](#), providing guidance on how accessible housing can be designed and built for all.

- 5.39** The current Local Plan identified needs which included:
- A transit site of 10 pitches
 - 5 pitches over the first 5 years
 - 14 pitches over the remaining 15 years.
- 5.40** The Local Plan Policy (Policy LLP20) safeguards existing sites at St Thomas's Road (Traveller pitches) and 14 and 72 Wigmore Lane (Showpeople plots) and includes policy criteria to allow pitches and plots to be permitted at sustainable locations to meet identified need. We have commissioned a Needs Assessment for the new Local Plan, which will provide up to date information and consider current government policy.
- 5.41** Policies will be required to provide for the needs of gypsy and travellers and to ensure there is deliverable supply of sites. However, we will need to consider carefully how and where this could be provided.

Question 13

How should we ensure that new housing is accessible and adaptable for those with specialist needs?

Options

1. Should the new Plan include policies for homes to be required to meet Category M4(2) or M4(3) standards?
2. Should Local Plan policies set a minimum requirement for the proportion of new homes on sites to meet M4 (2) or M4 (3) standards?
3. Should the accessibility standards be applied differently for market housing and affordable homes and/or in different locations?

Gypsy and Travellers and Travelling Showpeople

5.38 We are required to provide for the needs of the Gypsy and Traveller community. Gypsies, travellers and travelling show people are entitled to specific types of accommodation that allow them to continue with their traditional and nomadic way of life.

Question 14

How can the needs of the travelling community be provided for and where?

Options

1. Are there opportunities to accommodate the needs of the Gypsy and Traveller and Traveller Showpeople communities within Luton through permanent pitch and plot provision, including a transit site or temporary stopping places?
2. What should we consider in determining the location of new sites, such as their accessibility to services?

Question 15

Are there any Issues or Options you think we have not considered in this Chapter?

Supporting Economic Development



Butterfield Technology Park

Luton's Economy

- 5.42** Luton's local economy is well located, less than 30 minutes from London by train and with excellent transport links to London, the midlands and the north.
- 5.43** Historically Luton has been reliant on manufacturing, and this was reflected in its higher share of manufacturing jobs compared to its neighbours. Over time its employment base has undergone some changes and manufacturing has declined with the loss of some important industries, however it remains an important sector. The service sector has expanded and become more significant in providing jobs in retail, health and education. Transport, aviation related services, and distribution also play an important part in Luton's economy, with the logistics and construction sector growing steadily in the last 10 years. As well as larger companies, small and medium size businesses make a significant and valuable contribution to Luton's economy. Industrial estates and commercial areas as well as the town centre provide the main sources of employment, along with those working from home.
- 5.44** In 2019 the [South East Midlands Local Industrial Strategy](#) was completed by SEMLEP - the area's Local Authorities, including Luton, government and neighbouring Local Enterprise Partnerships in the Oxford-Cambridge Arc. It highlighted how the South East Midlands is already a successful, fast-growing knowledge economy and it has a focus on increasing productivity, supporting the aims of the national Industrial Strategy.
- 5.45** Luton has performed better than many parts of the country with a higher 3-year business survival rate than the UK average and the highest number of business start-ups

outside of London in 2022. However, Luton's economy faces a number of challenges, including:

- The longer term effects of the Covid-19 pandemic
- A higher proportion of low skilled jobs, including in the service sector such as in retail, restaurants, hotels and high street services relative to the national average
- Increases in unstable poorly paid work (e.g. zero-hours contracts) which can lead to 'in work poverty'
- Significantly lower growth in earnings than the UK average, despite year on year growth
- A shortage of skills in some sectors, including adults with low skill levels
- A higher proportion of jobs that pay below the UK's living wage
- Significantly higher levels of economic inactivity and employment rates compared to the national average
- An employment rate below the East of England and UK average
- An unemployment rate higher than the East of England and UK average over the same period
- One of the lowest levels of performance on 'new economy firms', meaning innovative and emerging sectors are not establishing as much in Luton as in other places
- Offices being lost to residential development with almost 3,000 sqm of employment floorspace lost to housing during 2022/ 2023
- Employment sites that were once attracting high tech business are no longer thriving
- Large warehouses occupying significant amounts of land but sometimes providing fewer jobs than other sectors
- A potential lack of energy supply to facilitate employment growth due to network capacity issues.

Question 16

How should we develop Luton's economy going forward?

Options

1. Are there local benefits from improving connectivity to other locations, cities and markets in the sub region?
2. Is there potential to encourage key anchor businesses to come to the town and which organisations can we work with to promote the town and encourage investment?
3. Is there scope to grow the service economy including tourism, culture and leisure and to attract visitors including users of the airport, to stay for longer in local visitor accommodation and hotels near cultural, leisure and art attractions, particularly around the town centre and the rail stations?
4. Should we seek to encourage new hotels only in the town centre or in other locations, for example at the airport?
5. What role should the town centre and the night time economy have in providing local employment and how should this be delivered?

The Airport

5.46 Luton is home to London Luton Airport, the UK's fifth largest airport, which is an important part of the local and wider economy. It is a key employer and the largest single source of employment. A significant number of businesses are based in Luton due to the airport, with a 9 per cent increase between 2022 and 2023. Over 12,000 people are employed in and around the airport with the majority being in full-time positions, mainly working in transport and storage and administration. [Luton Rising](#) have plans for the sustainable growth of the airport and leading the transition to net zero across the aviation sector in Luton, which includes creating a hub for green technology, research and finance. Its plans aim to add 5,200 green jobs to the local economy, including at Green Horizons Park. The airport is identified in the current [Local Plan \(adopted 2017\)](#) as a strategic allocation. Policy LLP6 addresses safeguarding, car parking, airport expansion

and sets out a policy approach for proposals at Wigmore Valley Park and Century Park.



London Luton Airport

Question 17

What do you think the future role of the airport should be in terms of contributing to economic growth?

Options

1. How can the Local Plan help ensure that the airport continues to provide employment and contributes towards growth and should there be more flexibility on how land associated with the airport can be used?

Local Skills and Social Value

5.47 The council is working with the [Centre for Local Economic Strategies](#) (CLES) and local anchor institutions, to co-design a local wealth building approach that increases local spend and embeds social value. The [Luton Employment and Skills Strategy \(2022-2017\)](#) highlights the opportunity to align growth and regeneration with the skills and employment needs of local residents, through the delivery of new jobs, training initiatives and infrastructure projects. The report recognises that apprenticeships are not gaining the necessary traction in comparison to academic study.

5.48 Housing projects contribute to the local economy and skills development by providing jobs, apprenticeships and through local procurement of services. [Luton's Housing Strategy](#)

(2022) highlights how establishing partnerships around green skills and construction can provide job opportunities for local people. Providing for high quality affordable homes in Luton will also help retain local labour and skills and contribute towards securing economic growth.

5.49 In August 2023 the council launched '[Step Forward Luton](#)', a new place and inward investment brand to maximise international exposure. Stakeholders represent all parts of the community, including key sectors and community leaders across education, sport, healthcare, the voluntary community sector, and arts, culture and heritage.

5.50 The current Local Plan does not include policies specifically related to social value and local wealth building, however there is an opportunity to embed this in the new Local Plan to provide job opportunities for local people and so the town can benefit from new business investment. There is an opportunity to work with the University, colleges, schools and other organisations to devise planning policies which help to improve skills including amongst the adult population, such as digital skills.

Question 18

How should we ensure that new business investment benefits Luton and its residents?

Options

1. Is there scope for new policies requiring all major developments to submit a Social Value Strategy with measurable criterion at the planning application stage, to address considerations such as local workers, suppliers, skills, apprenticeships and procurement processes?
2. How can the Local Plan ensure provision of housing opportunities to retain skilled (e.g. key workers) and low skill workers?
3. How can we encourage more high paid jobs into the town to build on Luton's educated population?

Sectors and Employment Land

5.51 Our [Luton 2040 Vision](#) includes building an inclusive economy which supports the growth of business, jobs, and incomes as a key priority. It also sets out the resources that will be required to help achieve net zero, which includes establishing long-term funding and investment plans, alongside developing the skills and supply chains required to deliver net zero and support the green economy.

5.52 Luton's [Inclusive Economy Strategy \(2020\)](#) aims to grow the economy by:

- Supporting more business start-ups and increasing their survival rates
- Increasing inward investment into Luton
- The growth of businesses in key sectors that are job creators and growing
- Expanding the proportion of high value jobs taken up by Luton residents
- Boosting the proportion of high-quality office space in the town centre.

5.53 The current Local Plan seeks to support business and industrial development on strategic employment site allocations and in existing employment areas, safeguarding the best quality sites (category A) while allowing employment redevelopment and mixed uses on other sites (category B). Strategic sites include Butterfield Green Technology Park, Newlands Park, Napier Park, land at Junction 10a and the airport. The council's latest [Authority Monitoring Report \(2022-2023\)](#) shows the progress made on employment sites in Luton.

5.54 Government policy requires that we set out a clear economic vision and strategy which encourages sustainable economic growth. The [proposed new NPPF \(2024\)](#) maintains this priority and explains how we should plan for a modern economy including for laboratories, giga-factories, data centres, digital infrastructure, freight and logistics and supporting infrastructure.

5.55 We will need to consider carefully how this can be achieved, the type of employment development we need to plan for and where this could be located. There may be limited opportunities remaining for allocating additional sites to support economic growth within the town as Luton is built up to

its boundaries. New policies could be developed to protect existing employment land serving key sectors and to encourage start ups. We will be collecting further evidence on employment needs as we progress. The council is also producing a new Economic Growth Strategy which will inform the Local Plan going forward.

Question 19

How can we support economic growth and how and where should land be used to achieve this?

Options

1. What type of employment and which sectors should we be encouraging, taking account of growth sectors and the modern economy?
2. How should we plan for storage, distribution and freight considering potential environmental and visual impacts?
3. How should we establish our employment needs and the amount of employment land we need to plan for?
4. Is there scope to protect quality/key employment land while identifying scope to further rationalise weaker employment sites?
5. If needed, where should we identify land for employment within Luton and what information should we consider?
6. What can the Local Plan do to encourage working from home to reduce pressure for employment land for some sectors and help provide for affordable workspace?
7. If there is a need to, how can we work with neighbouring areas to identify new employment land for new businesses and to meet growth and diversification needs of key sectors and where should this be located?
8. How should the Local Plan make provision of service infrastructure that attracts specific industries requiring significant power for their operations?

9. Should the new Local Plan include policies that protect employment land and offices for the largest and growing employment sectors, including to secure affordable premises (e.g. for small businesses and business start-ups in Luton) with good access to services?
10. Can the Local Plan do more to build on connectivity with economic drivers, growth sectors (e.g. AI, green technology, renewables, R&D) and partners such as the Airport and the University and Colleges, to boost STEM subjects, apprenticeships, local skills and local wage levels?
11. Should we identify sites for mixed use with ancillary uses to support viability and to be adaptable to changing trends such as AI?
12. What can the new Local Plan do to foster employment diversification, attract inward investment, and grow new sectors (e.g. community led and green business sectors, green aviation, biotechnology, renewables and research and development and AI) when there is likely to be limited land available within Luton?

Question 20

Are there any Issues or Options you think we have not considered in this Chapter?

Town Centre and Retail



The Hat Factory, Luton Town Centre

Shopping trends

5.56 Since the adoption of the current Local Plan, the UK has experienced major political, economic, and social events including Brexit, the Covid-19 pandemic, rising energy costs and the cost-of-living crisis, which have had consequential impacts on shopping trends. Covid-19, particularly, has led to changes to consumer and working behaviour with more people choosing to work from home, shop online or visit local shops and services. Retail sales volume has broadly declined nationally since April 2021.¹ These trends have brought economic challenges for town centres and high streets across the country. Generally, there is now more demand for leisure activities and services, which is reflected in Luton where people visit the town centre to eat out, use local facilities, work and socialise as well as for shopping. The proportion of restaurants, including hot food

takeaways, is high in Luton compared to the number of shops.

Question 21

What trends and information should we consider in planning for retail, leisure and services in Luton?

Options

1. Should the Local Plan focus on encouraging particular activities or areas to act as catalysts for improving and regenerating the town centre and wider town, such as cultural/music venues?
2. Should the Local Plan seek to grow Luton's retail capacity, role and accessibility within the sub region?

¹ [Office for National Statistics \(ONS\), released 24 May 2024, ONS website, statistical bulletin, Retail sales, Great Britain: April 2024](#)

Luton's Hierarchy of Centres

- 5.57** Luton's current [Local Plan \(adopted 2017\)](#) defines Luton as a regional shopping centre which also faces competition from other regional competitors such as Milton Keynes and Watford. As well as the Town Centre, Luton has a number of District and Local Centres which form the heart of local communities.
- 5.58** At the time of the current Local Plan's adoption, it was found that most of the existing District and Neighbourhood Centres were serving their local communities well and complemented the Town Centre. The Local Plan identified their potential to accommodate more community uses as well as the potential for the establishment of an additional new Neighbourhood Centre at Chaul End Lane or Dallow Road. Policy LLP21 sets out the hierarchy of centres, Policy LLP22 explains the approach for proposals in Primary, Secondary areas and frontages and Policy LLP23 applies to District Neighbourhood Areas & Shopping Parades. The boundaries of Luton Town Centre, District and Neighbourhood centres are shown on the current [Local Plan Policies Map \(2017\)](#).
- 5.59** The 6 District Centres include:
- Stopsley
 - Bury Park
 - Marsh Road
 - Marsh Farm
 - Sundon Park
 - Wigmore.
- 5.60** The 12 Neighbourhood Centres include:
- Farley (Market Square)
 - High Town
 - Round Green
 - Lewsey (St Dominic's Square)
 - Bushmead (Hancock Drive)
 - Bramingham (Freeman Avenue)
 - Hockwell Ring
 - Biscot Road/Blenheim Crescent
 - Calverton Road
 - Birdsfoot Lane South

- Napier Park
- Either at Chaul End Lane or Dallow Road.

- 5.61** These areas outside the town centre, such as Bury Park, and smaller shopping parades make an important contribution to Luton's economy and provide for shopping and other services. They also face some of the same issues and challenges as the town centre, including vacant units, an increase in hot food takeaways, and anti-social behaviour.

Question 22

What role should Luton have as a retail centre within the sub-region thinking about nearby settlements?

Question 23

What approach should we take to proposals for retail, leisure and community uses in Luton's District and Neighbourhood Centres and other areas outside the town centre?

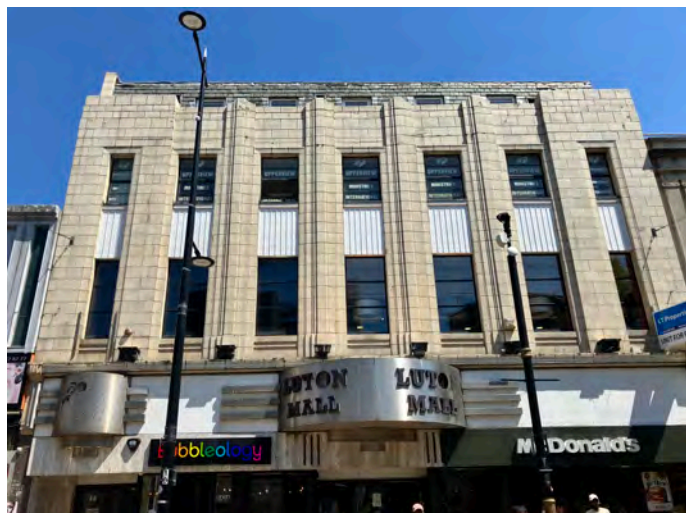
Options

1. Can the new plan do more to protect and enhance the vitality and viability of the shopping and service hubs in the hierarchy of Town Centre, District and Neighbourhood Centres?
2. How should we determine the role of the town centre, district centres, areas and streets such as George Street?
3. Is there potential to build on the existing activity at Bury Park as a cultural and economic hub?

Luton Town Centre

- 5.62** Key features of Luton town centre include the Mall shopping centre (now Luton Point), the University Campus, leisure attractions, two Conservation Areas (Town Centre and Plaiters' Lea), several listed buildings including St Mary's Church and the Town Hall, public squares and other shopping streets. It is the focal point in Luton for shopping, leisure, culture, education and employment. The town centre

also contains major public transportation hubs including Luton Railway Station and the adjacent Luton Dunstable Busway interchange.



Luton Point (The Mall)

5.63 There is a lack of inclusivity and sustainability in the town centre and some areas are less attractive and welcoming. Footfall in the town centre fell during 2023 – 24 ([Corporate Performance Report, 2023-2024, Luton Borough Council](#)) while businesses located in the Luton Town Centre listed crime and safety as their top area of concern.² [The Luton BID Business Plan 2020-25](#) also identifies street begging, rough sleepers, drug taking and drinking in public spaces as key issues. Whilst businesses considered events and things to do in the town centre had improved, they described the night-life, and leisure and cultural offer in the town centre as generally poor. There are also issues with antisocial behaviour such as the mis-use of e-bikes.

5.64 A lack of connectivity to different parts of the town centre, particularly connections between George Street and other areas of the Mall was described as contributing to the town centre's lack of a cohesive identity. Businesses were keen to explore other creative uses beyond retail and diversify the town centre, including through greater engagement with the University of Bedfordshire, an improved cultural offer and greater celebration of Luton's diverse communities.

5.65 The business plan also highlighted the declining number of office-based business

in the town centre and the need to improve connections with other economic areas in Luton, particularly towards the airport.

5.66 A movement framework for the town centre has been developed as part of the [Luton Town Centre Masterplan Framework \(2021\)](#), which seeks to encourage more active travel and travel by public transport. This aims to transform Luton's town centre from a vehicle-dominated place, to one which is fully accessible to all of Luton's communities by walking, cycling and public transport. The framework proposes possible interventions which include improvements to junctions, the introduction of additional pedestrian crossings, bus lanes and cycle lanes to encourage more active and sustainable transport modes. Additionally, parking provision would be reduced to car-lite and car-free as car parking is relocated to the periphery of the town centre, allowing the provision of more public areas and green space.

5.67 A reduction in parking is consistent with aims to reduce car trips to the town centre. However there is often illegal parking in Luton town centre and the number of parking spaces available in central Luton will likely reduce if new development is located on car parks. Changes to car parking provision in the town centre will need to be supported by improvements to walking and cycling infrastructure, including secure car parking, cargo bike hubs and e-bike charging.

5.68 Projects such as Hat Garden and the creation of the Hat District have made improvements by providing for important community spaces and activities in the town centre. Developments in the pipeline include the Stage on Bute Street car park and proposals for a new football club ground at Power Court, bringing mixed use development to the centre of Luton and providing a potential catalyst for more visits and a more diverse retail offer.

² [Luton BID in 2019](#)



River Lea, Hat Gardens

5.69 The Masterplan outlines proposals for the opening up of the River Lea, which has taken place at the former Silver Street car park, allowing for a new public open space. The Masterplan indicates that although there are few opportunities where the river can be seen, there are some places where uncovering the river is possible and a string of waterside spaces across the town centre can be established. The spaces would form part of a green corridor helping to improve air quality and sustainable drainage whilst contributing to the creation of an attractive public realm.

5.70 The current Local Plan (Policy LLP3) contains a strategy for Luton town centre which sets out how the centre will be a location for positive change and a focus for economic and residential growth and an improved natural and built environment. We will need to form policies which establish Luton's role as a retail centre and which help determine the type of uses and activities we would like to see in different locations. We may also allocate areas and sites to bring about positive change.

Question 24

How can Luton town centre be improved and what retail, leisure and employment opportunities should we encourage?

Options

1. How can policies promote diversification of Luton Town Centre and make it an exciting place to visit, with activities for all ages and cultures including families with children e.g. retail mix, leisure, entertainment, cultural facilities, public art, performing art, the night time economy and visitor attractions, including necessary amenities such as crèche and play areas, restroom facilities and where should these be located?
2. Is there scope for additional or less parking in the town centre and/or more flexible parking arrangements to support development of the night time economy?
3. How should the Local Plan seek to address any potential adverse impacts of new development in the town centre, such as noise or traffic generation?
4. What role should the Point play in the future of Luton town centre?
5. Should we encourage more employment uses in Luton town centre to help maintain and improve its vibrancy and what should these include?
6. How could we improve public spaces, and introduce new spaces, trees and planting in the town to improve the public realm and help reduce the effects of heat?
7. How can we continue to work with stakeholders and organisations to improve the town centre?
8. How should we encourage active travel to and within the town centre, consider the needs of those with disabilities, and ensure the safety of pedestrians and cyclists?
9. Can the new plan do more to improve the public realm and restore confidence in visiting the Town Centre and District Centres particularly at night time (e.g. tackle the adverse perceptions of crime and safety and antisocial behaviour)?
10. How can connections and legibility between different parts of the town centre be improved, for example through improved signage and way finding?
11. Is there scope for the more comprehensive redevelopment of Luton town centre including planning policies which focus particular uses in particular

areas such as new housing and retail uses?

Question 25

Should we seek to further restrict the type of development in certain areas of central Luton?

Options

1. Should the new plan review the retail mix on premier, primary and secondary frontages within the retail hierarchy to place limits on the number of hot food takeaways, and other types of retail, within particular areas? If so, where and how should those limits apply?
2. Is there scope for community-based enterprise, including healthy, diverse and local farmer food markets? If so, where?

Question 26

Are there any Issues or Options you think we have not considered in this Chapter?

Article 4 directions

- 5.71** Article 4 directions are designated by local authorities to remove permitted development rights in certain areas. Whilst it does not restrict development entirely, it ensures that developments require planning permission.
- 5.72** Luton has an Article 4 direction in place for certain areas in the town centre which has the effect of introducing tighter planning control of changes of use from commercial units to new homes, ensuring the retention of town centre uses and a vibrant town centre. It also helps to ensure that residential development occurs in the right location and meets local need.

Hot Food Takeaways

- 5.73** Although Luton is a relatively small town, it has a higher density of fast-food outlets compared to the England average. The types of food that are made easily accessible to Luton's residents may be having an impact on health outcomes, particularly in respect to levels of obesity.
- 5.74** The [Luton Food Plan \(2018-2022\)](#) highlights that 76% of children are a healthy weight at 4-5 years old, dropping significantly to 56% at 10-11 years old and that poor diet can have an impact on behaviour and affect the educational performance of children and young people.
- 5.75** Hot food takeaways also have the potential to cause nuisance to nearby residents due to general activity, particularly during the late evening, cooking odours, increased traffic movements and litter.
- 5.76** Planning guidance explains that planning policies can seek to limit the proliferation of particular uses where this is justified, however planning has limited control over the type of uses in town centres. The current Local Plan does not specifically address hot food takeaways but new policies could seek to address this issue if supported by evidence.



Improving Health Outcomes and Health Services

5.77 The [Index of Multiple Deprivation \(IMD\) 2019](#), published by MHCLG, includes a basket of 39 indicators to produce a single overall deprivation score for different parts of the country. The IMD is one way to monitor and assess the health and wellbeing of communities.

5.78 The IMD for Luton indicates that:

- Since 2015, Luton's deprivation ranking improved with a ranking of 70 (out of 317 authorities) with 4 of its 19 Wards showing improvement

- The proportion of areas in Luton in the top 10 per cent most deprived parts of the country has fallen with Luton having four areas in the top ten per cent most deprived. These are in Northwell, South and two in Farley. Previously Luton had nine areas in the top ten per cent
- The most deprived Ward in Luton is Farley and the least deprived Wards are Barnfield and Bramingham
- Luton's highest deprivation rankings are in the Barriers to Housing and Services (25th), income deprivation affecting older people (43rd) and crime (58th) indicators

5.79 The [Luton Joint Strategic Needs Assessment \(JSNA 2023\)](#), [Luton's](#)

[Pharmaceutical Needs Assessment \(PNA\) \(2022\)](#), the [Annual Public Health Report 2023: Luton – a Health Equity Town](#), and Luton Clinical Commissioning Group's [Wellbeing & Healthy Lifestyles Needs Assessment \(2017\)](#) highlight concerns in Luton centred on life expectancy and specialist needs across Luton's population including children and younger persons poverty, obesity and mental health wellbeing, social exclusion of elderly, infirm and people with a disability, family needs, including single parent households and carers, homelessness and unemployed people. Our [Luton 2040 progress report \(2024\)](#) shows how almost 9% of Luton households live in destitution and a further 11.8% of households are struggling to pay for some basic essentials.

5.80 [Luton's 2040 Vision](#) is focussed on securing "a healthy, fair, and sustainable town where everyone can thrive, and no one has to live in poverty". It contains objectives which seek to ensure that health and wellbeing improves across the town:

- Improving population wellbeing and tackling health inequalities to enable everyone to have a good quality of life and reach their full potential
- Tackling the climate emergency and becoming a net zero town with sustainable growth and a healthier environment.

5.81 In 2021 [Luton became a Marmot Place](#) in an effort to improve health and wellbeing in Luton and tackle health inequalities. [Luton's Population Wellbeing Strategy \(2023– 2028\)](#) has three overarching aims: to start well, live well and age well, and our Healthy Places Framework (2023) outlines eight elements of a healthy place:

- Movement and access
- Housing and building design
- Completed, compact and connected place
- Open spaces, play and recreation
- Food environment
- Local economy and employment
- Healthy high streets (environmental health, licencing and trading standards)
- Air quality.

5.82 Luton has over 40 health related services and facilities such as doctors and dentists. However as Luton continues to grow and cost of health provision escalates, it will be important to deliver, with health providers, accessible and viable health services. In preparing the new Local Plan, we will need to collect up to date information on health needs, priorities and provision. We will also need to ensure our Healthy Places Framework is reflected in our future planning policies.

Question 27

What should we do to address deprivation and improve life outcomes in Luton and what health facilities are required?

Options

1. What can the Local Plan do to help deliver Luton's Healthy Framework's objectives for a healthy place?
2. Can the new Local Plan do more through placemaking policies to help reduce deprivation, create healthy integrated communities and improve accessibility to health services?, If so, how?
3. Should the new Local Plan policies and strategy focus investment and delivery of health and facilities such as doctors surgeries within the town based on the current spatial strategy of Town Centre, district and Neighbourhood Centres?
4. Can the Local Plan do more to address health and lifestyles through efficient regeneration and diversification of uses in the town centre and/or in other areas?
5. Should the Local Plan aim to define more clearly, active travel routes and opportunities including to connect up areas of the town?
6. How can the Local Plan help improve skills and job opportunities to deliver improvements in health and wellbeing?
7. Should we use design codes to ensure that placemaking includes provision for high quality homes, active travel, green

space, quality environments, designing out crime and improved community safety?

8. How can we protect existing services and infrastructure important for health and wellbeing and for reducing deprivation and inequality?

Noise, Light Pollution and Hazardous Substances

5.83 New development can lead to adverse effects on people and nature including:

- Emissions, dust, particulate and air pollution generated from traffic, industrial and construction processes, and transport operations
- Noise and vibration from building operations, traffic (including rail and aviation related), and industrial processes
- Contamination of land from industrial and waste processes, surface water, flooding and leachate
- Increased light pollution e.g. arising from increased solar PV fitting, street lighting and increased density of development, illuminated signage and tall buildings.

5.84 Luton is a densely developed town with a historic legacy of industrial activity and recycling of previously developed land, often requiring assessment and remediation, removal and disposal of contaminated land and soil. The town has a significant chalk aquifer and the River Lea catchment which are sensitive to pollution risks associated with land disturbance, leachates, drainage and flood contamination events, including land instability.

5.85 The lessons from explosions such as Buncefield in 2005 underline the importance of controlling sites where hazardous substances could be present and where development is proposed near them. Government planning policy requires that we should avoid locating communities in areas where they would be affected by pollution, and we should aim to improve environmental conditions. This could include locating housing and schools away from busy roads and industry, to address safety, amenity and air quality.

5.86 We will need to ensure that negative uses which may contribute to deprivation and ill health are located in the right places or limited and controlled including considering impacts on quality of life, health, tranquillity and amenity, dark skies and nature conservation.

5.87 The airport is a source of noise that affects certain parts of the town in particular and the wider area. This is monitored regularly.

5.88 The current [Local Plan \(adopted 2017\)](#) policy requires evidence, mitigation and remediation in relation to pollution and contamination including consideration of:

- Chemical, biological, and radiological contamination and the effects of noise, vibration, light, heat, fluid leakage, dust, fumes, smoke, gaseous emissions, odour, explosion, litter, and pests
- Heavy metals like arsenic, cadmium, and lead; oils and tars; chemical substances and preparations, e.g. solvents; gases; asbestos; and radioactive substances
- Surface water, flooding, water courses and aquifers
- Land stability.

5.89 Preparation of a new Local Plan may offer opportunities to review and strengthen existing policies relating to pollution and hazardous substances, including those relating to climate change. One way to consider the health impacts arising from development is to require applicants to produce a health impact assessment. A health impact assessment can be required for particular types of uses that may be associated with more negative health impacts, or for developments proposed within particular areas (for example, air quality management areas). They can be used to help identify positive improvements to counteract potential negative health impacts.

Question 28

How could a new Local Plan protect against negative impacts from noise, light pollution and hazardous substances?

Options

1. Are there any existing policies that the new Local Plan should retain if fit for purpose?
2. Is there scope for the new Local Plan to include new or amended policy wording which will improve decision making in relation to pollution, contamination and hazardous installations? If so, how?

Air Quality

- 5.90** Whilst air quality has improved over recent decades, poor air quality is still an issue. It continues to have adverse effects on children, the elderly and the already vulnerable. Poor air quality can contribute to a reduced life expectancy.³ Poor air quality can also affect the natural environment including biodiversity and crop yields.⁴ Air pollutants may also combine in the atmosphere and contribute to climate change.
- 5.91** Local authorities are required to monitor air quality⁵ and, where necessary, draw up Air Quality Management Plans to describe how they will work to improve air quality within their areas. Air Quality Management Areas (AQMAs) are designated by local authorities in areas of poorer air quality and further work will normally be undertaken to mitigate pollution levels in those locations. Luton is currently developing an Air Quality Strategy.
- 5.92** The main pollutant of concern in Luton is nitrogen dioxide (NO₂) from traffic, and this is reflected in the location of the town's three [Air Quality Management Areas](#) (designated in 2003, 2005 and 2016). Other sources include London Luton Airport and local industry, which is distributed in pockets around the borough.
- 5.93** In addition to Nitrogen Dioxide, Luton is affected by poor air quality levels based on the levels of PM2.5 (fine particulate matter), which can affect those with health

conditions such as asthma. [Reducing Health Inequalities in Luton – a Marmot Town \(2022\)](#) produced by the Institute of Health Equity for Luton, explains that around 6.2% of all deaths in Luton are estimated to be due to long-term exposure to PM2.5, despite emissions not being especially high when compared nationally. Other factors may be preventing the dispersal of pollutants, including traffic congestion, a densely built and populated urban area, and poor air flow through streets. Data between 2018 and 2023 suggests that air quality has improved over time⁶.

- 5.94** The [NPPF \(2023\)](#) states that planning policies should prevent development contributing to or being put at unacceptable risk from unacceptable levels of air pollution. Development should help to improve local environmental conditions such as air quality.
- 5.95** The Luton Local Plan does not have a specific policy to address air quality matters, although air quality is referred to in various policies within the plan and the council requires that an air quality assessment is provided for certain proposals. Other strategies aim to improve air quality by improving provision and access to green infrastructure (which can help absorb pollutants), increasing the number of electric vehicle (EV) charging points around the town, and improving public transport and cycle routes to reduce road and car usage.
- 5.96** The Local Plan has a role to play in improving air quality by considering where growth should be located, providing the opportunity to travel by walking, cycling and public transport, and securing the availability of infrastructure to support electric vehicles. There is an opportunity for Local Plan policies to strengthen requirements in relation to air quality by:
- Requiring developments in certain areas (such as AQMAs) to be "air quality positive", meaning certain standards have to be met - an approach taken in London
 - Requiring major developments to review construction processes in order to

3 [Policy Paper on Air Quality Strategy: framework for local authority delivery, DEFRA, 2023](#)

4 [Policy paper on Air quality: explaining air pollution – at a glance, DEFRA, 2019](#)

5 [Air Quality Strategy for England, DEFRA, 2023](#)

6 [Data Tool, Centre for Cities, Accessed July 2024](#)

minimise further air pollution, and to use electric vehicles where possible

- As far as possible, avoid locating communities within areas of poor air quality.

Question 29

How can we improve air quality and mitigate against poor air quality?

Options

1. Do you think we should strengthen our policies around pollution and air quality? If so, how?
2. Should we adopt an approach similar to the London Plan and certain London Boroughs, where developments in areas of poorer air quality are required to meet certain standards / be "air quality positive"?

Question 30

Are there any Issues or Options you think we have not considered in this Chapter?

Addressing and adapting to climate change



Drought, August 2022

5.97 Climate change is one of the biggest challenges facing our society. A warming planet is expected to do significant damage to health, and there is evidence that the burden will fall more heavily on the most deprived communities.⁷

5.98 At the beginning of 2020, the council declared a climate emergency and set out its ambitions for Luton to be a net zero town by 2040.⁸ We also have a duty under the [Planning Act \(2008\)](#) to ensure our development plan documents have policies that contribute to the mitigation of and adaptation to climate change. Efforts to mitigate against climate change impacts and reduce greenhouse gas emissions can also have co-benefits for physical health, mental health and health equity⁹ as well as for the natural environment.

5.99 The Local Plan alone will not be able to address all climate change issues in Luton, but can support the council on its journey to reach net zero by 2040 through a number of policies.

Mitigation

5.100 Mitigating against climate change means reducing our impact on the climate as much

as possible. There are a number of ways we can do this.

5.101 We need to reduce carbon dioxide emissions that are within our control. In Luton, the majority of emissions are from homes (31%), normally from heating, using hot water, and powering appliances.¹⁰ Businesses and public sector buildings (24%), road transport (22%, of which 65% is due to vehicle usage), the airport, and public transport are all other sources of emissions.

5.102 Promoting the use of renewable energies could be one way to reduce carbon dioxide emissions. However, Luton is also a significantly built up borough and renewable energy needs will need to be considered against any land use implications or other impacts.

5.103 Promoting circular economy approaches could also help reduce carbon dioxide emissions, along with the promotion of developments following the waste hierarchy to minimise waste and pollution and reduce the impact of waste on climate change. Adequate separation of waste, recycling

⁷ [Reducing health inequalities in Luton: A Marmot Town, Institute of Health Equity, 2022](#)

⁸ [A town-wide vision for Luton 2040 – a Net Zero Town, Luton Council, 2022](#)

⁹ [Reducing health inequalities in Luton: A Marmot Town, Institute of Health Equity, 2022](#)

¹⁰ [A town-wide vision for Luton 2040 A Net Zero Town, Luton Council, 2022](#)

and food waste will also contribute towards minimising impacts on climate change.

- 5.104** Although the current Local Plan sets standards for sustainable buildings, and further standards are set out in the [Luton Town Centre Design Guide SPD \(2023\)](#), a new Local Plan provides an opportunity to review our current standards and consider whether higher standards could be set in policy.

Adaptation

- 5.105** Adaptation means evolving our communities, buildings, places and infrastructure as the climate changes. Adapting to and being resilient to flood risk is an example, which is addressed elsewhere in this document.
- 5.106** The Summer 2022 heatwave is estimated to have caused at least 3,200 deaths in the UK.¹¹ Cooling is particularly important in cities that face rising temperatures due to the urban heat island effect. Often, poorer neighbourhoods are more affected as residents have less access to air conditioning and green spaces, and are more likely to be living in overcrowded homes.¹² The Luton Marmot Town Report also talks about the importance of the cooling of homes, but lack of access to green space is an issue for some in the borough and opportunities to green the environment may be limited.
- 5.107** Food security is a national concern that may be impacted by climate change. Improving opportunities for growing local produce through allotments or community growing could also contribute towards having a healthy food environment in Luton, identified in the Luton Healthy Place Framework (2023).
- 5.108** The importance of addressing climate change impacts is addressed through a number of government plans and strategies. Mitigating and adapting to climate change whilst minimising waste also forms part of the government's [Environmental Improvement Plan \(2023\)](#).

- 5.109** The [Planning and Energy Act \(2008\)](#) allows local planning authorities to set higher targets for energy performance standards for development than the national baseline in building regulations. A number of authorities have implemented their own local efficiency standards.
- 5.110** Government policy requires the planning system to support the transition to a low carbon future and Plans should take a proactive approach to mitigating and adapting to climate change.
- 5.111** The current [Luton Local Plan \(adopted 2017\)](#) policy LLP37 (Climate Change, Carbon and Waste Reduction and Sustainable Energy) requires the council to support development proposals that contribute towards tackling climate change. Developments are encouraged (but not required) to exceed national standards set out in building regulations. Non-residential developments over 1000sqm are required to reach the 2013 BREEAM good status.
- 5.112** The [Luton Net Zero: Climate Policy and Action Plan \(2023\)](#) sets out the actions that the council will take to reach a net zero Luton by 2040. This includes ensuring new Local Plan policies promote net zero carbon development, maximising energy efficiency and requiring high standards of energy performance, sustainable drainage systems, minimum standards for green space and tree cover, and increasing access to spaces for growing food.
- 5.113** The government's 2023 consultation on plan-making reforms refers to the possibility that a national policy on carbon measurement and reduction could set a baseline whilst enabling authorities to set further measures in their own plans based on parameters set in national policies.¹³ There is therefore some potential that climate change matters could be set out in National Development Management Policies.
- 5.114** However, a new Local Plan could contain locally specific policies to mitigate against climate change impacts unique

11 [Statement on climate change, World Health Organisation, 2022 \(accessed 10 July 2024\)](#)

12 [The Climate Crisis – a Guide for Local Authorities on Planning for Climate Change, TCPA and RTPI, 4th edition, updated 2023](#)

13 [Levelling-up and Regeneration Bill: consultation outcome on reforms to national planning policy, DLUHC, 2023](#)

to Luton. We will be collecting further information for the Local Plan to greater understand the local issues specific to Luton and determine the best way to contribute towards tackling climate change.

5.115 A new Local Plan provides an opportunity to form policies for:

- Reducing carbon dioxide emissions, including understanding the carbon impacts of development. This could include wider resource efficiency (e.g. water efficiency, energy efficiency) to reduce energy demand and could also apply to the construction process itself
- Setting retrofitting standards, including to historic buildings and EV charging
- Adapting to flood risk and promoting sustainable modes of transport and active travel
- Promoting renewable, low-carbon energy and decentralised energy and district heating networks
- Setting requirements for sustainable buildings (e.g. BREEAM, Passivhaus), going beyond minimum standards required by building regulations to reduce energy demand (subject to viability testing)
- Adopting circular economy approaches and following the waste hierarchy to reduce the impacts of waste on climate change, along with ensuring that developments provide for the storage separation of waste, recyclables and food waste
- Mitigating against the urban heat island effect through design measures and other tools such as green infrastructure and tree canopy cover (discussed elsewhere in this document, and which also aid towards carbon sequestration)
- Promotion of opportunities for local food-growing and carbon capture.

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.

Options

1. Should we set energy efficiency standards over and above current and anticipated Building Regulations?
2. How should we address the challenges of retrofitting existing building stock, balancing this against the need to protect historic buildings, and are there examples of good practice?
3. Should we require more opportunities for food production to aid with food security, poverty and health? This could include more allotments and communal gardens
4. Should we encourage the decarbonisation of energy supply, such as through decentralised energy, heat storage and gravity storage, and pumped water storage?

Flood Risk

5.116 Climate change will likely result in milder, wetter winters and increased summer rainfall intensity. There are many sources of flood risk in Luton, however, the biggest risk in Luton is surface water flooding. In June 2016, the Luton and Dunstable area was impacted by major surface water flooding to properties and critical infrastructure. Flooding was also experienced in September 2024.

5.117 The River Lea flows through the town. However, it is extensively culverted in Luton, and culverts can increase the risk of river flooding through blockages and structural failure. They also prevent access, fish passage and reduce biodiversity. Current UK climate projections indicate peak flows on the Upper River Lea to increase by up to 59% by the 2080's.¹⁴

5.118 The Houghton Brook, Cat Brook, Riddy Brook and Lewsey Brook are also potential sources of flood risk, along with rising groundwater, overwhelmed sewers and drainage systems, and artificial sources of flooding such as the Sundon Reservoir. The council's [Local Flood Risk Management Strategy](#) was produced in 2015 and a revised version is due to be produced. Flood

events took place in 2016 and 2017 along with some other incidents that were more localised.

5.119 There are many aquifers in the area and many of the watercourses are spring-fed, which indicates that groundwater levels are at or very close to the ground surface in some locations in the area.¹⁵ Luton along with a number of other authorities is part of a project ([Project Groundwater](#)) which is looking to greater understand groundwater flooding.

5.120 Increased rainfall due to climate change will put pressure on existing sewer systems, potentially leading to more frequent flooding. Areas of Luton have historically experienced sewer flooding, thought to be associated with the expansion of the north of the town in the 50's / 60's without upgrading the sewer system in the centre of the town. The extensive risk of surface water flooding also stems from this rapid expansion.



SuDS planter, William Austin Junior School (photo credit: Luton Council)

5.121 A new £8.5million flood storage area (the Houghton Brook Flood Storage scheme) was completed in 2021 and will allow rainwater to drain into the Houghton Brook, cutting the risk of flooding along the Houghton Brook and River Lea in Luton. The council is also embarking on a programme to de-culvert the River Lea, and a new pocket park at Hat Gardens which incorporated the opening up of the river was completed in 2023.

5.122 The previous government's [Environmental Improvement Plan \(2023\)](#) outlines how the government will make sustainable drainage systems mandatory in new developments. Changes to legislation are awaited to make SuDs mandatory on particular developments.

5.123 The River Lea is located within the Thames River Basin. The [Thames Basin River Management Plan, Environment Agency \(updated 2022\)](#) includes actions such as the mandatory use of SuDS and restoring the natural function of water landscapes. The [Resilient and Adaptive Communities \(RAC\), Environment Agency, Central Bedfordshire Council and Luton Council \(2022\)](#) project recommends the use of nature-based solutions that tackle all sources of flooding and the creation of a natural environment that is enhanced through blue-green infrastructure.

5.124 The [Luton Lea Catchment Partnership](#) is a group of individuals and organisations united to improve the River Lea with the aim of increasing public access to and involvement in the river and to reduce flood risk.

5.125 Government policy expects local plans to take into account of the long-term implications of flood risk. We will be collecting further evidence on flood risk and on how new development may impact on water resources.

5.126 There is an opportunity for the Local Plan to include policies which:

- Take a sequential approach to development, both in terms of which sites are allocated through the Local Plan and

14 [Resilient and Adaptive Communities, Environment Agency, Central Bedfordshire Council and Luton Council, August 2022](#)

15 [Luton Level 1 SFRA Update, produced by Capita Symonds for Luton Council, February 2013](#)

where development within each red line boundary is situated. Windfall sites would also be expected to demonstrate that they meet the sequential and exceptions test

- Take account of flood risk from all sources, including current and future impacts of climate change, based on an up to date Strategic Flood Risk Assessment
- Require sustainable drainage systems on both minor and major developments; although we may not need to require this if the government makes it mandatory anyway
- Protect and enhance blue and green infrastructure – for example, opening up and restoring the natural function of the River Lea through naturalisation and the River Lea Linear Park, requiring a certain proportion of green space to be provided on development sites
- Maximise opportunities to reduce the impact of flood risk, e.g. through permeable surfacing, reducing run-off and making space for water
- Promote nature-based solutions that tackle all sources of flooding.

Question 32

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

Options

1. Should policies promote the naturalisation and de-culverting of the River Lea to increase flood plain storage?
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?
3. Do you have any suggestions on how Luton could be made more resilient and adaptive to flood risk?
4. Should developments be required to slow the flow of surface water – such as through permeable materials, water conservation and sustainable drainage systems?
5. Should developments be required to separate surface water from foul drainage?

Water Quality and Water Efficiency

5.127 The River Lea (from Luton to Luton Hoo Lakes) is currently of poor ecological status.¹⁶ The main reasons for this include changes to its natural flow and levels of water, pollution from wastewater and towns, cities and transport, and physical modifications.

5.128 The town has chalk aquifer ground source protection zones which are sensitive to potential development and activities that might give rise to pollution. Water quality can be an issue due to the sensitivity of the chalk aquifer. For this reason the current Local Plan seeks to prevent development from contributing to water pollution and requires the satisfactory disposal of surface water to receiving water courses and aquifers where feasible.

5.129 The Thames Basin River Management Plan aims to improve the condition of the River Lea. The [Luton Lea Catchment Partnership](#) is a group of individuals and organisations united to improve the River Lea. They promote reducing

¹⁶ [Lee \(from Luton to Luton Hoo Lakes\) Water Body Catchment Data Explorer, Environment Agency, Accessed 05/07/2024](#)

household water consumption and pollution and reducing pollution through physical improvements around the river.

5.130 Water supply in Luton is provided / managed by Affinity Water, with very small areas to the north of the town managed by Anglian Water.

5.131 The South East of England is an area of serious water stress, and the total amount of rain falling in any year is expected to decrease slightly in the next 100 years. This means there will be future pressures on public water supply due to population growth and climate change causing drier conditions.¹⁷

5.132 With less rain falling in summer, more rain falling in winter, and more intense rainfall events, we need to do what we can to ensure availability of water throughout the year, including reducing water usage demand or storing water for later reuse.¹⁸ Affinity Water's draft [Water Resources Management Plan \(2024\)](#) identifies protecting chalk streams, population and housing growth as key challenging for the region's water supply.

5.133 The government has set a goal in the [25 Year Environment Plan \(2018\)](#) to achieve clean and plentiful water. This is also reflected in the [Environmental Improvement Plan \(2023\)](#) which proposes using nature based solutions to reduce pollutants entering the water environment through tools such as sustainable drainage and wetlands. The plan also discusses a desire to increase efficiency in new developments and retrofits to promote a sustainable and resilient water supply.

5.134 Government planning policy requires development, where possible, to help improve water quality, and major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.



River Lea, New Bedford Road

5.135 LLP36 of the Local Plan requires developments in Luton to contribute towards the River Lea achieving good ecological status, and developments are expected to incorporate sustainable drainage systems and include water efficiency and rainwater harvesting where feasible. LLP37 requires residential developments to achieve a water efficiency standard of 110 litres per day. LLP38 expects development to provide for the satisfactory disposal of surface water to deliver water quality improvements and new development should not be detrimental to the management and protection of water.

17 [Environmental Improvement Plan 2023, DEFRA, 2023](#)

18 [Resilient and Adaptive Communities, Environment Agency, Central Bedfordshire Council and Luton Council, August 2022](#)

- 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.
- 5.137** In order to address water quality issues, we will need to explore how we can continue to require developments to contribute towards achieving “good” ecological status of waterbodies in the borough and promotion of the enhancement of the natural environment through green and blue infrastructure and nature-based solutions.

Question 33

How can we improve water quality in Luton’s rivers and improve water efficiency in new developments?

Options

1. Should we explore adopting tougher water efficiency standards in a new Local Plan, including greater promotion of rainwater harvesting?
2. How can we ensure new developments contribute towards our waterbodies meeting “good” ecological status?
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?
4. Should SuDS be multi-functional - for example, seeking to improve water quality, biodiversity, and contributing towards blue and green infrastructure in the borough?

Question 34

Are there any Issues or Options you think we have not considered in this Chapter?

Protecting and enhancing the natural environment



River Lea, Manor Road Park

Biodiversity Net Gain

- 5.138** According to the [State of Nature Report \(2023\)](#), the UK is now one of the most nature depleted countries on Earth with nearly one in six species at risk of extinction. A strengthened biodiversity duty was introduced in [the Environment Act 2021](#), which now requires public authorities in England to consider what they can do to conserve and enhance biodiversity.
- 5.139** Biodiversity net gain (BNG) is an approach to development that was introduced under the Environment Act 2021. Under this legislation all major developments and small sites are required to deliver at least 10% BNG, excluding certain exceptions. Where 10% BNG cannot be delivered on site, developers can purchase off-site credits locally or as statutory biodiversity credits.
- 5.140** Certain exemptions mean that some developments are not subject to BNG requirements, such as development that does not impact on a priority habitat or impacts less than 25 sqm of onsite habitat. An example of this would be development solely on a sealed surface, such as an existing carpark.
- 5.141** Luton is a built-up borough. There is a possibility that some sites including brownfield sites coming forward for development may be exempt from BNG requirements due to them not currently having any onsite habitat.
- 5.142** Government planning policy requires us to protect and enhance sites of biodiversity and pursue opportunities for securing net gains for biodiversity. Policy LLP28 of the adopted [Local Plan \(adopted 2017\)](#) explains that the council will support development proposals that add to the stock of wildlife habitats or where they help to deliver a gain in

the conservation and enhancement of such sites.

- 5.143** Councils can set out their own local policies on biodiversity net gain in local plans. For example, we could introduce a policy requiring a higher percentage of biodiversity net gain (e.g. 20%). Such a policy would need to be backed up by appropriate evidence.
- 5.144** A local policy could also allow us set out any local priorities or strategies that we would like developers to take into account when delivering BNG – for example locally important habitats, green infrastructure strategies, local nature recovery strategies, any local biodiversity action plans. This can also be used to target offsite BNG delivery.
- 5.145** We could also seek BNG on sites that would otherwise be exempt due to there being no existing biodiversity value, or would deliver low levels biodiversity net gain due to low existing baselines.

Question 35

How should a new Local Plan approach biodiversity net gain?

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.
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?
3. Should we rely on mandatory requirements only, as set out in legislation?
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?

Green and Blue Infrastructure

- 5.146** The [NPPF \(2023\)](#) defines green infrastructure as “a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity”.
- 5.147** Green Infrastructure can include trees and woodlands, green roofs / walls, parks and private gardens, wildlife areas, roadside verges, rights of way, and canals and rivers.¹⁹
- 5.148** Luton is a significantly built-up borough but benefits from a variety of parks and green spaces. Some parts of the town are lacking in terms of access to green spaces, and some green spaces are fragmented and are dispersed throughout the borough. The River Lea flows through the town but a lot of it is culverted. Because Luton is mainly urban it is susceptible to the urban heat island effect (where urban areas experience higher temperatures than more rural areas). Green infrastructure can help mitigate against this.
- 5.149** We know that there are many competing uses for land – such as the need for housing, and for employment space. This, combined with the built-up nature of the borough, means that it may be a challenge to create significant net new provision of green infrastructure. There has also been a cumulative loss of some green space over the years through the implementation of crossovers / dropped curbs.

19 [Natural England, Green Infrastructure Framework, 2023](#)



Manor Road Park

5.150 The government's [Environmental Improvement Plan \(2023\)](#) promotes the use of green infrastructure to reduce risk and impact of extreme heat and surface water flooding. Following this, Natural England launched their [Green Infrastructure Framework](#) in 2023. The principles and standards within it are voluntary, but its aim is to help local planning authorities meet requirements of the NPPF and consider the role of green infrastructure in local plans. The five headline standards are:

- The green infrastructure strategy standard - for authorities to assess and strategically plan their green infrastructure provision
- Accessible green space standard - looking at size, proximity and capacity
- Urban nature recovery standard - setting targets for nature recovery and creation and restoration of wildlife rich habitats
- Urban greening factor standard - where urban greening is at least 40% average green cover in residential neighbourhoods where they do not already meet that standard
- Urban tree canopy standard - setting an agreed percentage to increase tree canopy.

5.151 The current [Green Infrastructure Plan for Luton](#) (2015) identifies a green infrastructure network for the town and highlights areas where current green infrastructure is important and identifies opportunities for new, better connected, or enhanced green infrastructure. The [Luton Green Space Strategy Review](#) (2015) also identifies areas of deficit in terms of accessibility to green

spaces. We know that some green spaces such as Dallow Downs may be less accessible due to their terrain, and some places such as Bury Park do not have an easily accessible neighbourhood park. In making a new Local Plan we will look at having a more up to date understanding of our open space needs and we will also produce a green infrastructure study so we can produce a clear vision for delivering green infrastructure.

5.152 The [River Lea Catchment Partnership](#) have a number of objectives linked to improving green and blue infrastructure, including improving public access to the river, improving existing wildlife corridors, and increasing the amount and quality of habitats. Central Bedfordshire Council are also producing a [Local Nature Recovery Strategy](#) for Bedfordshire which will include the Luton area. The strategy will include the identification of wildlife corridors and stepping stones between habitats, which could also be drawn on to enhance Luton's green infrastructure framework.

5.153 Policy LLP27 of the adopted Local Plan sets out the council's approach to green infrastructure and supports proposals that safeguard and enhance existing networks of open space and establish new green infrastructure within the borough. Development proposals that result in a loss of green infrastructure will only be permitted in particular circumstances. Policy LLP3 also supports the de-culverting of and improving access to the River Lea, along with new green spaces being encouraged.

5.154 The council is currently exploring opportunities around a new River Lea Linear Park, which will include improving linkages between existing green spaces and the River Lea to create one new linear park in the town.

5.155 Our intention is that policies in a new Local Plan:

- Follow Natural England's green infrastructure framework standards and principles, although standards may be tailored to reflect Luton's circumstances if our evidence base shows that that is what we need to do. Standards could include the urban greening factor, tree

canopy cover, and accessible green space standards

- Promote new green infrastructure, including linkages between current green spaces in the borough, and considering links to adjoining areas
- Enhance, maintain and protect existing green and blue infrastructure, including the River Lea and Public Rights of Way
- Recognise and promote the multi-functional benefits that green and blue infrastructure provides, including access to nature to support health and wellbeing outcomes
- Support the de-culverting and naturalisation of the River Lea, along with riverside improvements which achieve multiple benefits.

5.156 Because green and blue infrastructure is so closely connected to other areas of planning it is likely that other policies in a new Local Plan (for example, biodiversity, or open space provision) will impact on green infrastructure provision. Green infrastructure requirements and references are therefore likely to be woven throughout a new Local Plan.

5.157 National development management policies (which are proposed through planning reform) are not intended to replace locally-specific policies. Green and blue infrastructure policies for Luton will be locally-specific based on evidence base work. We will produce a new green and blue infrastructure study to understand how policies in a new Local Plan can help support, enhance and expand on Luton's green infrastructure framework.

Question 36

How can green and blue infrastructure in Luton be improved and enhanced?

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).
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?
3. Given the competing uses for land, should we encourage the multi-functional uses of green infrastructure? Multi-functional uses could be: green spaces also reducing flood 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)
4. Should a new Local Plan do more to protect green roadside verges?

Green Belt and Protected Landscapes

5.158 While Luton is a predominantly urban borough, 3% of the town's total land area is Green Belt, spread over 6 areas. As well as serving the functions of the Green Belt as set out in the NPPF, Luton's Green Belt also provides for other beneficial uses such as amenity and outdoor recreation. There are competing priorities for land use within Luton and we have reviewed our Green Belt boundaries in the past. A [Stage 1 Green Belt study](#) prepared for Luton in 2014 found that the existing Green Belt areas in Luton made substantial contributions to meeting Green Belt purposes as defined in the NPPF.

5.159 Many parts of our Green Belt also have other national designations, such as the Chilterns National Landscape (also known as the Chilterns Area of Outstanding Natural Beauty) SSSIs, Scheduled Monuments and Registered Parks and Gardens.

- 5.160** Luton lies within the northern end of the Chilterns National Landscape. It is recognised for its globally rare chalk streams, wildflower-rich chalk grassland, and prehistoric settlements. The borough also contains a number of areas of great and local landscape value, which comprise either important green corridors and sites adjoining the Chilterns National Landscape, or areas of more limited value within the local context.
- 5.161** The map in Chapter 3 shows areas of Green Belt and the Chilterns National Landscape (AONB) within Luton and just outside Luton's boundary.
- 5.162** There are no regionally or locally important geological sites in Luton. There are areas of agricultural land surrounding the town.
- 5.163** A new duty was introduced in December 2023 through the [Levelling Up and Regeneration Act 2023](#) which means that we will have an enhanced duty to seek to further the purposes of conserving and enhancing the natural beauty of the Chilterns National Landscape.
- 5.164** Whilst little of the designated Chilterns National Landscape lies within the borough boundary, it is recognised that development within the town can have an impact on the National Landscape beyond the borough boundary. There can also be direct and indirect impacts on such designated landscapes. Natural England is in the process of carrying out a boundary review of the Chilterns National Landscape, meaning that there is potential for the boundary to be extended in the future.
- 5.165** The government's [Environmental Improvement Plan 2023](#) identifies greening the Green Belt, protecting landscapes and their heritage, and enhancing nature outcomes for areas of outstanding natural beauty (national landscapes) as a key goal. The government also commits to improving accessibility in national landscapes.
- 5.166** The NPPF attaches great importance to Green Belts, with the fundamental aim of Green Belt policy being to prevent urban sprawl. Authorities should plan positively to enhance Green Belts' beneficial use. The NPPF also gives great weight to conserving and enhancing landscape and scenic beauty in areas of outstanding natural beauty. Planning policies should also contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.
- 5.167** Policy LLP4 of the adopted Luton Local Plan only allows for inappropriate development in the Green Belt to be permitted in very special circumstances, while LLP29 outlines that development proposals will be supported where they protect, conserve or enhance the character, setting, and natural beauty of national and local landscape areas, according to a hierarchy designations.
- 5.168** The government has previously suggested that issues of national importance such as protecting the Green Belt could be covered by National Development Management Policies (which are proposed through planning reform).²⁰ This means that there could be national policies covering the Green Belt and perhaps protection of National Landscapes in the future.
- 5.169** The government's consultation on the [new NPPF \(2024\)](#) sets out proposals for councils to consider whether there are areas of Green Belt which are of lower quality, known as 'grey belt'. If this is introduced we will need to assess the Green Belt and consider policies which take this into account.
- 5.170** It is our intention that policies in a new Local Plan:
- Resist inappropriate development in the Green Belt, unless very special circumstances apply, consistent with the NPPF
 - Support development proposals where they protect, conserve, or enhance the character, setting and natural beauty of the Chilterns National Landscape and local landscape areas - seeking opportunities to enhance the landscape and improve access to nature, and avoiding adverse impacts
 - Seek to further the purpose of conserving and enhancing the natural beauty and special qualities of the Chilterns National Landscape

20 [Levelling-up and Regeneration Bill: reforms to national planning policy, DLUHC, December 2023](#)

5.171 We will carry out evidence base work to review Luton's local landscape areas and Green Belt. A review of Luton's landscapes will need to take into account any boundary changes to the Chilterns National Landscape, if known and finalised at the time of production.

Question 37

Are there any local Green Belt or Chilterns National Landscape matters that we need to consider?

Options

1. Are there any areas of the Green Belt that you consider to be of lower quality which could be used for new homes or employment uses, or could be enhanced or improved for environmental benefits?
2. How can we seek to enhance the purpose of conserving and enhancing the natural beauty and special qualities of the Chilterns National Landscape?
3. Should we continue to designate Local Landscape Areas - important sites and green corridors adjacent to the Chilterns National Landscape, and other areas of more limited landscape value?

Natural Capital

5.172 According to the [State of Nature Report, produced by the State of Nature Partnership \(2023\)](#), the UK is now one of the most nature depleted countries on Earth.

5.173 Nature conservation sites can be designated at an international or European Level (e.g. Special Areas of Conservation (SACs), at a national level (e.g. Sites of Special Scientific Interest (SSSIs)) or at a local level (e.g. local wildlife sites) depending on the importance of the site.

5.174 Luton benefits from a number of ecological sites and the adopted Local Plan lists 25 county wildlife sites and 14 district wildlife sites. We also have two SSSIs - sites of national importance - within our boundary.

As Luton is an urban, built-up town, many of our wildlife sites are dispersed, although some are part of wider district or neighbourhood parks. The River Lea is recognised as both a County and a District wildlife site, but is of poor ecological status and is considered to be heavily modified.²¹

5.175 Luton also benefits from a number of woodlands and parks and a population of approximately 30,000 street trees, made up of 143 different species.²² Research has shown the many benefits that trees bring to social, economic and environmental wellbeing, including improving air quality, reduced summer temperatures, and reducing run off caused by localised flooding.



5.176 Natural England has recently reviewed its Ancient Woodland Resource meaning that an increased amount of woodlands are now recognised as Ancient Woodland within our boundary since the last Local Plan was adopted. Other woods within Luton are less significant for biodiversity but will still provide important ecosystem services and are included within SSSIs or county wildlife sites.

5.177 Development plans such as the Luton Local Plan have the potential to affect biodiversity outside of their boundary. Evidence produced by [Footprint Ecology in 2022 in support of the Dacorum Local Plan](#) looked at the recreational pressures on the Chilterns Beechwoods Special Area of Conservation (SAC) at Ashridge Estate and Tring Woodlands, which are located

²¹ [Lee \(from Luton to Luton Hoo Lakes\) Water Body, Environment Agency, Updated 3 August 2023](#)

²² Luton Tree Policy and Tree Management Strategy 2020-2030

in Dacorum. The western portion of Luton falls within a 12.6km “zone of influence” for the Ashridge Commons and Woods but residents of Luton made up less than 2% of visits to the SAC.

- 5.178** A strengthened “biodiversity duty” was also introduced in the [Environment Act 2021](#), which requires public authorities in England to consider what they can do to conserve and enhance biodiversity.
- 5.179** The [25 Year Environment Plan, DEFRA \(2018\)](#) explains that the government will develop a Nature Recovery Network to protect and restore wildlife. The [Environmental Improvement Plan \(2023\)](#) also states the government’s aim to halt the decline in species abundance, increase tree canopy and woodland, and to improve the condition of SSSIs.
- 5.180** The NPPF requires planning policies to enhance the natural and local environment by protecting and enhancing sites of biodiversity value and priority habitats and ecological networks should be promoted. Policy LLP28 of the adopted Local Plan explains that the council will support to development proposals that add to the net stock of wildlife habitats or where they help to deliver a net gain in the conservation and enhancement of such sites. Development proposals that impact adversely on statutory or other designated sites, and ecological networks, will need to demonstrate compliance with sequential criteria.
- 5.181** Central Bedfordshire Council is currently producing a [Local Nature Recovery Strategy \(LNRS\)](#) for the Bedfordshire authorities (Luton, Central Bedfordshire and Bedford borough). The LNRS seeks to identify aims and ambitions for nature recovery, what the best actions for nature recovery are, and where they can be delivered.
- 5.182** Luton also falls within the Upper Lea Catchment Plan area. Objectives of the [Upper Lea Catchment Plan \(2014\)](#) produced by the River Lea Catchment Partnership include improving water quality and increasing the amount and quality of in-channel, bankside and floodplain habitat for the River Lea.

- 5.183** The Luton Tree Management Strategy (2021) promotes a healthy, resilient tree stock of increasing ecosystem service value to maximise the many health and wellbeing benefits it provides. It aims to actively seek new and off-site provision of trees from development schemes.
- 5.184** We also have a [Luton Nature Conservation Strategy \(1992\)](#), however, this requires updating. We are currently carrying out work to understand the baseline of our wildlife sites and identify where improvements could be made.
- 5.185** Policies in a new Local Plan provide the opportunity to:
- Protect and enhance sites of biodiversity value (including previously developed sites, distinguishing between the hierarchy of international, national and locally designated sites) and protect irreplaceable habitats (including ancient woodland and ancient and veteran trees)
 - Identify, map and safeguard sites of ecological value and wider ecological networks, including wildlife corridors and stepping stones, as identified in the local nature recovery strategy and other evidence base work. This could include identification of opportunities for the restoration / creation of new habitat areas associated with planned development
 - Promote the enhancement of networks of habitats, supporting linkages where possible and desirable, and recognise the role that habitats play in mitigating against the impacts of climate change
 - Promote certain design features such as the usage of integral swift bricks, artificial roosting locations for bats and birds, and semi-permeable barriers to allow species movement
 - Have regard to the Bedfordshire LNRS with policies that support the achievement of the statement of biodiversity priorities. This could include supporting the opportunities identified in the LNRS and mitigating against pressures identified, promoting the enhancement of priority habitats and recovery of priority species
 - Introduce an Urban Tree Canopy Cover and Urban Nature Recovery

Standard (as per Natural England's Green Infrastructure Framework)

5.186 Natural England has also advised that mitigation may be required in relation to the Chilterns Beechwoods SAC for developments of a net increase of more than 100 dwellings in certain parts of Luton. This could involve contributions towards a Strategic Access Management and Monitoring strategy, as well as provision of Suitable Alternative Natural Greenspace. This may need to be reflected in strategic policies or site allocation policies.

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?
2. Should we aim to increase tree cover throughout the borough?
3. How can the Local Plan help to conserve and enhance Luton's natural environment, and achieve wider environmental gains?

Question 39

Are there any Issues or Options you think we have not considered in this Chapter?

Community Facilities, Indoor Sport and Recreation



Inspire Luton Sports Village

Community Facilities and Indoor Sport

5.187 There are almost 300 community assets distributed throughout Luton, including:

- Health facilities
- Five council-owned community centres, along with a number of other community halls owned and managed by other bodies
- Five libraries - all libraries are managed by Active Luton, and play an important social role in the borough with regular activities for all ages and abilities
- Museums, including the Stockwood Discovery Centre and Wardown House museum
- Over 100 religious institutions, reflecting Luton's super diverse community. As well as being places of worship, some of

these will function as wider community spaces serving local community needs

- A number of indoor built sports facilities, including sports halls, and swimming pools
- 85 schools and education establishments.

5.188 The council recently carried out a community assets mapping exercise which found that there is a concentration of community assets in the town centre and a lack of community assets in the east. Central ward has by far the most community assets and Round Green the least.

5.189 [Government policy \(Assets of Community Value Policy Statement, Department for Communities and Local Government, 2011\)](#) allows for communities to have a right to identify a building or other land that they believe to be of importance to

their community's social well-being. A number of community assets have been identified through this process in Luton. The new government has announced a new community "right to buy" for community assets such as empty shops, pubs and community spaces, which could help revamp highstreets but detail on this is not yet available.

- 5.190** Poor access to health services and other community facilities can have an adverse impact on health and wellbeing. Within [Luton's Fairness Strategy \(2023\)](#) the council has committed to reviewing its community assets for groups suffering higher levels of social exclusion. This will help us to identify barriers and understand how we can create more equitable opportunities for wider access. However, there isn't necessarily a link between poverty and the availability of community facilities. For example, Central and Beech Hill wards have high levels of deprivation but also have a high number of community facilities, whereas Wigmore and Barnfield wards, which are relatively more affluent, lack community facilities.
- 5.191** The current [Local Plan \(adopted 2017\)](#) aims to secure linked trips such as the weekly shop combined with visits to libraries, post office, community and health facilities within the District centres, while the essential daily grocery shop and local community facilities are focussed on Neighbourhood Centres, accessible by walking, cycling and public transport.
- 5.192** The benefits of sport and exercise are well documented²³ and exercise plays an important role in reducing risk of major illnesses and improving mental health. Social isolation is linked to poorer health outcomes²⁴. Community facilities, including those that are used for sport and exercise, therefore have an important role to play in local communities.
- 5.193** The [Active Luton Strategy \(2023-2028\)](#) outlines a number of strategic priorities, including supporting the wellbeing of our community through increasing physical activity and reducing social isolation.

- 5.194** The council recently consulted on a draft Indoor [Built Facility Strategy \(2024\)](#) for the period up until 2031. The strategy shows that one of Luton's main challenges is to ensure all of its indoor built sports facilities are high quality and accessible. There is a current surplus of sports halls and swimming pools but a shortage of fitness provision. We will need to update this study to reflect the new plan period, taking into account anticipated population changes.

Education Facilities

- 5.195** The council has a legal duty to ensure there are sufficient school places for its population. In contrast to much of the rest of the country, Luton's birth rate has been on an upward trend since 2021/22 and rose sharply in 2023/24. Inward migration is increasing overcrowding in schools in Luton and new developments in the south of the town are adding to the pressures on school capacity. Pupil forecasts indicate there will be a significant shortfall in capacity in the next five years, both in the mainstream and special school sector. This mainly applies to Farley / South, High Town, Dallow, and Crawley, and mainly applies to primary school capacity. There is a need to expand secondary school places too but older children are generally able to travel further to school.
- 5.196** A further 112 secondary special school places are scheduled to be provided by September 2026 on a site at Kestral Way in the west of Luton. However, places could potentially be needed from September 2028.
- 5.197** Currently some families are being asked to travel more than 2 miles to access school places. Making families travel has knock on effects such as traffic, hardship problems, and lack of attendance. Identifying a suitable site is an issue and all primary schools in the south are currently expanded as much as possible. Pupil growth will impact further up the line effecting college places.

23 [Benefits of Exercise, NHS.UK, Accessed 23/07/2024](#)

24 [Reducing health inequalities in Luton: A Marmot Town, Institute of Health Equity, 2023](#)



St Matthews Primary School

- 5.198** There are currently not any spaces for special needs post-16 education. The council is currently producing a new employment and skills strategy, education strategy and a school place planning strategy, which will all inform policies in a new Local Plan. There are a number of academies in Luton where the council has less policy influence.
- 5.199** The [NPPF \(2023\)](#) promotes achieving healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles. Planning policies should enable the retention and development of local services and community facilities. The NPPF also notes the importance of a sufficient choice of school places being available

to meet the needs of existing and new communities.

- 5.200** Policy LLP24 of the adopted Local Plan allows for permission to be granted for development that contribute towards an identified need for community facilities. The loss of community facilities will only be permitted in certain circumstances. The policy also supports provision of sufficient primary and secondary school places, including extending existing schools. The policy is supportive of integrated service delivery, particularly flexible multi-use buildings in public and community ownership and colocation of various facilities, and agreements to use school facilities and other public buildings for community use.
- 5.201** We have a [Planning Obligations SPD](#) which was adopted in 2007. It has been identified that special school, nursery, and post 16 places are not included within the scope of the SPD. We could consider reviewing the SPD but SPDs are proposed to be abolished through planning reform.
- 5.202** Our new Local Plan will need to consider and address the needs for additional school spaces, particularly primary school spaces in the south of the borough. Identifying new sites will be a challenge considering the built-up nature of the borough. Our policies could still take a positive approach to expanding existing schools or could promote improving safe access and connections to existing schools such as through public transport, walking or cycling. We will need to explore how we can build on our relationship with the University, hospital and other organisations in the provision of education and the improvement of skills.
- 5.203** It is likely that where need has been identified for new community uses, policies will continue to promote the proposed co-location of these facilities where a number of services can be delivered together through family hubs / community hubs / one stop shops. New policies will likely continue to protect existing indoor built sports facilities, and depending on emerging evidence, may need to require the provision of new facilities. The current Local Plan supports the use of agreements for school facilities and other public buildings to be open for community use, and our new Local Plan could continue to do this.

Question 40

What community facilities do you feel need to be enhanced, protected, or new provision provided for within your area?

Options

1. Should we continue to promote the co-location of community facilities?
2. Should the Local Plan support the intensification/expansion of primary and secondary schools or identify new sites to meet future growth needs?
3. Do you have any suggestions on how primary school place needs could be planned for, particularly in the south of the borough? Are there any sites that we should explore?
4. Should we explore different design solutions for new schools due to limited land availability?
5. How can we work with the University and other organisations to improve skills for adults as well as children?
6. Are there indoor sports facilities which you think need to be enhanced and/or protected or any new facilities provided?

Local Green Spaces

5.204 Green spaces have an important role to play in supporting health and wellbeing, mitigating against climate change, and for wildlife and biodiversity. The [Green Infrastructure Plan for Luton](#) (2015) identifies a green infrastructure network for the town, highlighting areas where existing green infrastructure is important, and identifying opportunities to create, enhance or connect green infrastructure. The [Luton Green Space Strategy Review](#) (2015) indicates areas of green space deficit.

5.205 The NPPF explains that Local Green Spaces can be designated through local or neighbourhood plans to allow communities to identify and protect green areas of particular importance to them. Their level of protection is equivalent to that of the green belt.

5.206 The Local Green Space designation should only be used if the green space is:

- in reasonably close proximity to the community it serves
- demonstrably special to the local community and holds a particular local significance (for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife)
- is local in character and not an extensive tract of land.

5.207 There is no lower size limit for a green space to meet to be considered for the Local Green Space designation. A Local Green Space designation is unlikely to be appropriate if the land already has planning permission for development.

5.208 There are currently no designated Local Green Spaces in Luton and there is no equivalent policy within the adopted Local Plan to protect them. Policy LLP27 gives a level of protection of a variety of types of green space through supporting proposals that safeguard and enhance existing networks of open space and green infrastructure. It only allows development proposals that result in the loss of particular green spaces in exceptional circumstances.

5.209 Since the NPPF gives local green spaces a level of protection similar to that of the green belt, protection of Local Green Spaces could be outlined in future potential national development management policies.

5.210 We would like to receive your nominations for any Local Green Spaces that you consider to meet the above criteria for designation and that you would like to be designated as part of the new Local Plan.

Question 41

Are there any sites that you consider to meet the criteria for Local Green Space designation?

Open Space, Outdoor Sport, Children's Play and Recreation

5.211 Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and wellbeing of communities.²⁵ The Fields in Trust [Revaluing Parks and Greenspaces \(2019\)](#) report states that parks and greenspaces are estimated to save the NHS around £111 million per year, and access to green space can have positive impacts on mental health as well as physical health.

5.212 Healthy and sustainable places support good mental and physical health, and this is important in Luton, where life expectancy at birth for both males and females is below the national and regional averages. In 2022/23 a significantly higher percentage of year 6 children were overweight or obese than the national or regional average.²⁶ One third of Luton's population is physically inactive, although there are good quality green spaces in Luton, they are not easily accessible for some neighbourhoods.²⁷

5.213 There are a number of parks, open spaces, outdoor sports and recreation and playground facilities throughout the borough, including 6 district parks, 28 neighbourhood parks, and 47 playgrounds. Luton also benefits from a number of outdoor sports facilities, including cricket, multi-use games areas, football pitches, rugby union pitches, bowls, netball, hockey, athletics and tennis facilities.

5.214 Green spaces need to be perceived as safe in order to attract use. According to research collected by Make Space for Girls²⁸ once children get older and start going to parks on their own, parks are used much more by boys than by girls, and girls use them with less confidence. Quality (and accessibility or lack of sensory equipment for children with disabilities) is an issue for some play equipment in the borough although the council has a ten-year programme for capital works including upgrading equipment. Where development comes forward in the future, it may be

preferable in some cases for developer contributions to be made towards improving existing play equipment than the provision of new play equipment.

5.215 There is a need to find a balance between access routes, play equipment, open space and sports pitches, meeting the needs of different users with the limited spaces we have.



Children's playground

5.216 Green spaces also need to be accessible. Some of Luton's green spaces (such as Dallow Downs and Warden and Galley Hills) are not particularly accessible due to their terrain. Some of our neighbourhood parks do not benefit from car parking or disabled parking and space is limited to be able to implement this. Lack of parking can also result in people having to drive elsewhere to access greenspaces, which has impacts on pollution and traffic.

5.217 The NPPF requires authorities to plan positively for the provision of community facilities such as sports venues and open spaces and to protect existing open spaces, sports and recreational buildings and land. Local Plan policy LLP27 reflects the NPPF, requiring the safeguarding and enhancement of existing networks of open space and supporting the establishment of new green infrastructure. Loss of open space can only be permitted in certain circumstances.

25 [Using the planning system to promote healthy weight environments, Public Health England, 2020](#)

26 [Annual Public Health Report, Luton Council, 2023](#)

27 [Reducing health inequalities in Luton: a Marmot Town, Institute of Health Equity, 2022](#)

28 [Research Report, Make Space for Girls, 2023](#)

5.218 The council has recently produced a draft [Playing Pitch and Outdoor Sport Strategy and Action Plan \(April 2024\)](#). The Strategy shows that all existing playing field and outdoor sports sites (including disused, underused and poor quality sites) need to be retained due to shortfalls now and in the future, up until the year 2031. The strategy also recommends enhancing outdoor sports facilities and ancillary facilities through developer contributions.

5.219 The Luton Healthy Place Framework (2023) lists eight elements of a healthy place, of which Open Space, Play and Recreation is one. Under this element greenspace of recreational value, networks of multifunctional open space and activity for all neighbourhoods are all important factors.

5.220 A Green Space Strategy Review for Luton was produced in 2015 to assess quantity and quality of open space in support of the current Local Plan. The strategy notes that there are still significant areas that do not have access to a green space of some sort within walking distance. There are gaps in the distribution of neighbourhood parks and some communities, such as Bury Park, do not have easy access. The moving of Luton Town Football Club away from Kenilworth Road could therefore present an opportunity for green space to be provided, as noted in the [Inspector's report \(2017\)](#) for the adopted Luton Local Plan. This will need to be balanced with other needs such as the need for housing.

5.221 Planning policies should be based on robust and up to date assessments of the need for open space. We will be required to produce a more up to date study to understand open space requirements (including accessibility, quality, and any areas of deficiency) and sports and recreation needs to match the new plan period. This should include provision of play spaces for children and young people.

5.222 New Local Plan policies will likely still require the protection of open spaces and support the retention and enhancement of existing play pitches where there is identified need. Policies will need to provide for new open space on certain developments and for new play pitch facilities or play equipment and outdoor gyms depending on the findings of new evidence base studies. Given the

competing uses for land, a new Local Plan could support the concept of land swaps to allow for less-used open space to be put to other uses with more accessible and or better located replacement open space being provided for elsewhere.

5.223 A new Local Plan could also include policies around provision of children's play in areas of identified need or where certain thresholds are met through a minimum provision approach. Alternatively, design policies could require children's play facilities to be incorporated throughout developments and build in more "play-friendly" environments, as advocated in [Reclaiming Play in Cities \(2021\)](#) by the Real Play Coalition and the RTPI. Developer contributions could be required to improve existing playgrounds rather than provide new provision. We could also do more to consider safety and accessibility for those with disabilities in the design of open and play spaces.

Question 42

How can the Local Plan help to ensure access to a network of high quality open spaces?

Options

1. Should we adopt open space standards, requiring provision of new open space in identified areas of need?
2. Are there any additional standards or types of open space that the Local Plan should consider?
3. Should we encourage certain play facilities for different age groups, or encourage more informal, play-friendly environments and how should play parks be provided for?
4. Should a new local plan do more to consider safety and inclusivity?
5. Are you aware of any lesser used green spaces (including allotments) that could be considered for land swap?

Burial Capacity

5.224 As a compact town, built up to its boundaries and surrounded by the Southern

Bedfordshire Green Belt, Luton faces significant challenges in meeting all of its needs locally, as most land is already developed or constrained and there is strong competition between land uses. As the population grows and ages (e.g. through natural change and net migration flows), there will be further need over the plan period, to provide additional capacity to accommodate burials and cremations.

5.225 The council owns and operates the General Cemetery at Rothesay Road, the Vale Cemetery and Crematorium at Butterfield Green. In addition the council maintains the following facilities:

- St Mary's Parish Church
- Stopsley Parish Church
- Biscot Parish Church
- Quaker Burial Ground, Crawley Green Road
- St Mary's Churchyard, Church Street
- St Thomas Churchyard
- Holy Trinity Churchyard, Biscot.



St Mary's Churchyard

5.226 As well as accommodating natural change in the population, the religious and cultural diversity of the town brings different burial and cremation practices, some of which (e.g. swift burial or the desire for natural burials, use of shrouds and vaults) add to the the need to find suitable sites for burials and cremation.

5.227 Capacity for burials and cremations in existing facilities has largely, been used up and burials/cremations are now limited to:

- The Vale Cemetery and Crematorium, Butterfield Green Road (opened 1959, extended 2015 and 2024) - expanded capacity for 7,000 burials is anticipated to run out by 2025
- Luton Church Burial Ground (also known as St Mary's Cemetery and Crawley Green Road Cemetery).

5.228 The NPPF promotes achieving healthy, inclusive and safe places and that planning policies should enable the retention and development of local services and community facilities. In particular with respect to burial grounds and cemeteries no specific provision is made, except for the appropriateness of such facilities within the Green Belt provided that they maintain the openness of the Green Belt.

5.229 The adopted Local Plan does not set out any specific provision for cemeteries, burial grounds or crematoria. However, there are policies for the protection of sensitive historic cemeteries, burial grounds and churches, particularly where impacted by strategic allocations and new developments.

Question 43

How should the Local Plan approach the potential need for additional burial spaces?

Options

1. Should the Local Plan look at ways that recycling of land can provide potential solutions to burial provision?
2. Is there scope for further intensification and innovation within burial and cremation facilities?
3. Should Luton look at the limited Green Belt areas in the borough to find capacity?
4. Are there other ways that burial capacity can be increased within the town?
5. Should Luton work with its neighbours to help meet our needs e.g. identify land provision outside Luton, including in the Green Belt?

Question 44

Are there any Issues or Options you think we have not considered in this Chapter?

The Historic Environment



Plaiters' Lea conservation area

5.230 The historic development of Luton provides a rich legacy of older industrial (e.g. associated with the hat making industry), domestic, cultural, civic and religious buildings, including historic monuments, parks and gardens. Many of these assets are of significant architectural and/or historic merit which help to define the special character and identity of different parts of the town.

5.231 Alongside Historic England's schedule of statutory protected designations (listed buildings, ancient monuments, Conservation Areas and Registered Parks and Gardens), the borough maintains a [Local List \(published on the Luton Council website 2023\)](#) of non-designated heritage assets. Many of these assets can be found where people live, work, conduct business, meet socially, engage in worship, arts and entertainment or access Luton's shopping and transport services. The

Central Bedfordshire and Luton Historic Environment Record (HER) is a key source of information for Central Bedfordshire and Luton's historic environment, from the earliest human activity through to the twentieth century. All Scheduled Monuments and Listed Buildings of Special Architectural or Historic Interest are recorded together with ancient woodlands, historic parks or gardens and field systems.

5.232 The borough has five Conservation areas and over 100 designated heritage assets, which includes listed buildings and other monuments. The conservation areas are:

- Town Centre Conservation Area
- High Town Conservation Area
- Plaiters Lea Conservation Area
- Rothsay Conservation Area
- Luton South Conservation Area;

- 5.233** To the the south of the town is also a nationally significant asset - Luton Hoo estate, House and garden (Grade I Registered Park and Garden).
- 5.234** As Luton continues to grow redevelopment pressures may increase the risk of harm to heritage assets. Some historic buildings in Luton have been lost and others are vacant and in poor condition and its conservation areas have seen a prevalence of uses, such as hot food takeaways, which is affecting their character and purpose. We have three Conservation Areas on [Historic England's risk register \(updated annually, last updated 2024\)](#); High Town, Plaiters' Lea and George Street / Town Centre. On some occasions unsympathetic changes have been made to historic buildings including through the introduction of insulation measures aimed at increasing energy efficiency. The challenge for the new Local Plan will be to deliver high quality development and regeneration that respects and integrates with heritage assets including bringing them back into appropriate use.
- 5.235** The council's [2040 Vision](#) explains the role that historic assets, townscapes and character can play to build community identity, pride and wellbeing, as well as bringing built assets back into economic use. Amongst targets listed in the Luton 2040 vision is the commitment to deliver a new ten year heritage strategy for the town. With the help of grant funding from the National Lottery Heritage Fund our heritage strategy '[Curating Luton](#)' launched in 2021. The strategy was co-developed in partnership with over 30 community and stakeholder groups, and with contributions from over 300 people as part of the Heritage Enabler project. Heritage Fund supported projects are being delivered across Luton through a heritage steering group and the NLHF Heritage Fund has invested over £2.7m in the town.
- 5.236** The [NPPF \(2023\)](#) explains how historic assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. The current [Local Plan \(adopted 2017\)](#) seeks to improve

the built and natural environment, and achieve high quality development and design which respects the character of the town. It identifies key assets including those associated with manufacturing in Luton. The conservation of our historic environment will be key to protecting and enhancing the important parts of the character of Luton ensuring it is place where people want to live, work and visit. We will need to consider if any buildings are at risk which could be added to Historic England's risk register.

Question 45

How can we best conserve and enhance the historic environment in Luton and are there any areas and buildings we should focus on?

Options

1. Should the Local Plan set out a strategic heritage policy that sets out a clear spatial approach (which is locally specific) to development securing protection and identifying opportunities for enhancement and identifying where development would be appropriate?
2. Should heritage policy be more integrated with different policies within the plan?
3. Should the Local Plan set out heritage policies for renewable energy, energy conservation, zero carbon and climate change extremes, adaptation and mitigation?
4. How can the Local Plan seek to conserve and enhance heritage assets (including designated and non-designated assets) and their settings and archaeological sites including encouraging the re-use of historic buildings, and celebrate the diverse population and culture of the town?
5. How should the Local Plan build on the work of heritage strategies and projects in Luton?
6. How can we allow for appropriate, residential, retail use and other commercial development to take place including in our town centre whilst conserving the historic environment? (for example in relation to shop fronts)
7. How can we ensure that proposals for development in a Conservation Area or affecting the setting of a Conservation Area conserve or enhance its special interest, character, appearance and setting?
8. What factors should we consider in forming policies for additions or alterations to, or change of use of, a Listed Building or for development within the curtilage of, or affecting the setting of, a Listed Building?
9. What information should developers be required to consider and submit with any planning applications including to assess impacts?

Question 46

Are there any Issues or Options you think we have not considered in this Chapter?

Placemaking and Design



Hat Gardens, town centre

The Public Realm and Inclusive Design

5.237 Luton like many towns has suffered from some development since the second world war which is of a lower design quality, including the materials that have been used. There are some derelict and vacant sites which are negatively effecting the feel of the town. Some areas of the town are not well connected and buildings and roads act as barriers to creating a coherent and attractive town centre. Public areas and spaces in the town centre are not always accessible and inclusive and can encourage crime and anti-social behaviour. However some more recent developments and projects have gone some way to improve the public realm and more are in the pipeline.

5.238 Older areas of terraced housing often have a lack of off street parking, leading to parking on the streets and issues with bin storage resulting in bins being

left out in front of homes. This can be unsightly, as well as leading to accessibility issues. Introducing design improvements to existing residential areas is often more challenging and requires different design solutions.



St George's Square, town centre

5.239 Our [Luton 2040 vision](#) explains how the design of the public realm should be child-

friendly whilst providing opportunities for play and informal recreation for all. Policy LLP25 in the current [Local Plan \(adopted 2017\)](#) contains design requirements for new developments and Policy LLP26 sets out criteria for the consideration of advertisements and signage. Luton currently has masterplans covering [Luton Town Centre \(2021\)](#) and [High Town \(2016\)](#) which provide design guidance with the aim of increasing the design quality of new developments. The High Town Masterplan incorporates the [East Village Design Codes \(2009\)](#). The [Luton Town Centre design guide supplementary planning document \(SPD\) \(2023\)](#) directly supports the Luton Town Centre Masterplan vision by providing practical direction in the design of residential development and related uses in the town centre. The council is also producing a new Public Realm Design Strategy which takes a comprehensive approach and aims to improve the design quality of buildings, developments and public spaces in Luton.

5.240 Government policy emphasises design as a key aspect of sustainable development. Good design of the built environment and of our green and community spaces can contribute to more cohesive and healthy communities if buildings and public spaces are designed to be accessible, inclusive and distinctive. There is also an opportunity for energy efficient design solutions and the design of public spaces to contribute towards achieving net zero and reducing the effects of climate change. We will need to ensure that public areas and buildings are safe for residents and visitors.

5.241 Well designed buildings are important, however good design also involves consideration of; the context and setting of places and buildings, hard and soft landscape, infrastructure, such as transport, utilities, and drainage, and social infrastructure that supports social, commercial, and leisure activities.

Options

1. Should the new Local Plan include specific policies that support the design of a public realm that is safe, welcoming and provides recreational play for all?
2. Should the new Local Plan include specific policies that support socially and culturally inclusive buildings and public spaces?
3. What should public spaces contain, for example, landscaping, public art, street furniture and how can we make them feel safe, accessible and inclusive?
4. How can we improve the appearance and function of our existing neighbourhoods?
5. How can we enable safe active travel routes and facilities through design solutions?
6. What changes should we make to our town centre and other areas to improve their function and appearance?
7. Should we pedestrianize some areas of the town, such as Bury Park to reduce car use and encourage economic activity and improve the public realm?
8. Where permission is required, what approach should we take to advertisements and signage in the town centre and other areas?

Design Codes

5.242 To provide clarity about design quality expectations, the [NPPF \(2023\)](#) requires local planning authorities to prepare design codes or guides. The [National Design Guide \(MHCLG, 2021\)](#) sets out priorities for well-designed places focusing on ten characteristics, and the National Model Design Code provides detailed guidance for the production of design codes. [Building for a Healthy Life \(Homes England, 2020\)](#) (BHL) is a Design Code for improving the design of new and growing neighbourhoods providing guidance on:

Integrated Neighbourhoods

- Natural connections
- Walking, cycling and public transport

- Facilities and services
- Homes for everyone

Distinctive Places

- Making the most of what's there
- A memorable character
- Well defined streets and spaces
- Easy to find your way around

Streets for All

- Healthy Streets
- Cycle and car parking
- Green and Blue Infrastructure
- Back of pavement, front of home

developments, although its use is limited to areas where it is considered appropriate.

Options

1. Should the new Local Plan include specific criteria that would trigger the use of Design Review Panels, and should it be a mandatory requirement of the planning process once triggered?

Question 47

How can we improve the public realm and the design of buildings in Luton and where should this be focussed?

Options

1. Should we develop an authority-wide design code that incorporates key aspects of the Town Centre and the High Town masterplans?
2. Should we focus on developing place-based codes, particularly for the site allocations identified in the new Local Plan, which can add to existing masterplans?
3. In addition to design codes, should the new Local Plan also incorporate Building for a Healthy Life in the planning policies?
4. What is important in the design of new developments for example in relation to materials used?
5. How can we ensure that energy efficient measures are introduced to achieve net zero?

Tall Buildings

5.244 The NPPF does not provide specific guidance on tall buildings, however, the National Design Guide recognises that well-designed tall buildings can add positively to the urban context acting as landmarks that define places. Proposals for tall buildings, however, could have an adverse impact on their surroundings, such as on the historic environment and skylines. The viability of sites could be improved with the inclusion of tall buildings, however the associated regulatory requirements can increase build costs. The current Local Plan does not contain a definition of tall buildings that controls height and it does not identify areas in Luton that could accommodate tall buildings.

Design Review Panels

5.243 Design Review is an independent and impartial process in which a panel of experts on the built environment provide design advice on new development and public realm proposals. It is a well-established method for appraising major developments and for achieving high quality design in the built environment. Policy LLP25 of the current Local Plan allows the council to use a Design Review Panel for major



New development, Eaton Green Heights

Question 48

Do you think that we should encourage tall buildings in Luton and where should these be located?

Options

1. Should we identify areas in Luton that can accommodate tall buildings and set the maximum acceptable height?
2. Should we identify in the new Local Plan key view corridors that should be protected?

Question 49

Are there any Issues or Options you think we have not considered in this Chapter?

Connectivity and Transport



Buses on Church Street

Encouraging sustainable travel

5.245 Luton has seen a consistent increase in private vehicle ownership and there are high levels of in-commuting into the town. [Luton's Local Transport Plan \(LTP4\) \(2021\)](#) explains that half of people that either live or work in Luton commute less than 5 Km but the number of cars containing only one person is high. At the same time, some areas with higher levels of deprivation have no access to a private car and residents rely on public transport. Travel by road makes up 23% of all carbon emissions in Luton and worsening air quality and low levels of walking and cycling are impacting on health. Rat-running through residential areas is causing a nuisance for residents and is unsafe.

5.246 The strategy for sustainable transport in Luton is based on the vision for Luton's [Local Transport Plan 2011-](#)

[2026](#), which is to ensure that an integrated, safe, accessible, and more sustainable transport system supports the economic regeneration and prosperity of the town.

5.247 The council's Transport Vision for 2040 is to make Luton carbon neutral through the provision of an integrated, safe, accessible, and more sustainable transport system that allows for active travel and reduces car use. The Local Transport Plan 4 sets out Luton's strategic priorities and policies to achieve more sustainable access to goods and services in the town over the next 20 years. It seeks to:

- Encourage more cycling, walking and public transport use through infrastructure provision
- Discourage cars from the town centre and near schools

- Promote shared transport such as car sharing
- Provide more charging infrastructure for electric vehicles
- Reduce traffic and improve air quality

5.248 The council's aim is to help facilitate different transport choices amongst Luton's residents through provision of high quality and appealing public realm, reduced traffic, and improved air quality to achieve a tenfold increase in cycling and double walking by 2040. This builds on the priorities of our [Luton 2040 vision](#) to improve health outcomes and to embrace carbon reduction.

5.249 Disincentives to using private vehicles such as parking enforcement and the introduction of Red Routes on some roads in the town centre and Airport Way are already in place. Restrictions on certain classes of vehicles, including a Workplace Parking Levy or Low Emission Zone could be introduced.

5.250 There are a number of bus routes serving Luton, including a guided busway which could be extended to better serve our residents and surrounding areas. Some bus routes stop operating after certain times of the day and it is difficult to access employment sites from some residential areas. In partnership with bus operators and other stakeholders, the council is currently working to deliver improved bus services in the town as set out in its [Bus Service Improvement Plan \(BSIP\) \(2021\)](#). The BSIP aims to build upon the success of the [Luton-Dunstable Busway](#) and the [Luton Investment Framework](#).

5.251 The current [Local Plan \(adopted 2017\)](#) identifies two park and ride sites, at Butterfield and land south of Stockwood Park. Planning consent for the Butterfield Park & Ride site was granted in March 2024 with operation potentially starting in 2025. Funding for the project is coming from the Bus Service Improvement Plan funding that awarded Luton £19.1m in 2022. A demand responsive transit (DRT) backed bus service will transport users to the town centre, airport and station. Following a feasibility study commissioned in 2024, the council is considering the benefits of an additional Park & Ride site on land south of Stockwood Park.

5.252 DRT is a flexible service that provides shared transport to people who specify their desired location and time of pick-up and drop-off and includes services such as dial a ride, taxis and community transport. It is a key way for people who do not have access to a private car to travel in and around Luton and it can complement public transport services, improve mobility and help reduce emissions.

5.253 The [NPPF \(2023\)](#) places emphasis on the relationship between sustainable development and the promotion of sustainable travel. Our objectives for meeting the challenge of climate change is to ensure that housing and employment are located in sustainable locations. Encouraging sustainable transport modes, low-carbon technologies, and living closer to jobs, education, services and amenities can lead to reduced travel, reduced carbon emissions and generally more sustainable communities.

5.254 Changing current travel patterns will require high quality infrastructure for sustainable travel modes. We will need policies that promote walking, cycling and the use of public transport and connectivity. We will need to consider the transport impacts of strategic development proposals outside of Luton's boundaries and ensure that they are integrated and connected to Luton to encourage the use of sustainable modes.

Question 50

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

Options

1. Should we set sustainable travel targets within the new Local Plan and should we introduce policies that require developers to include these as part of their Travel Plan measures that they will undertake to deliver?
2. Is there an opportunity to create 10 or 15 minute neighbourhoods where District and Neighbourhood centres are accessible to their population catchments and all communities by public transport, walking and cycling within these journey times?
3. How can we ensure that public transport provision is secured to serve new developments and existing routes are improved and/or extended?
4. Should we consider providing low traffic neighbourhoods and where should these be located?
5. How can we encourage and facilitate the provision of demand responsive transport?
6. How can we work with neighbouring authorities, stakeholders, bus and rail companies to examine the potential to extend and improve bus and rail services beyond the town to other locations in the sub-region?

Decarbonising Transport



EV charging

- 5.255** The increased use of vehicles that have zero or low emissions can contribute to

reducing carbon dioxide and improving air quality. Over the last three years the number of electric cars and vans in Luton has increased by 360% compared to a 290% average increase in the UK as a whole. However, despite recent delivery of more charge points through our [Charge Point Strategy \(2022-2025\)](#), there are limited charging points and a significant proportion of homes have no off street parking meaning private home provision can be challenging.

Options

1. To support the growth of electric vehicles, should we identify land for the provision of charging points in the new Local Plan?
2. How can we ensure that development proposals consider and facilitate the use of electric cars?
3. Should we account for developing technology, such as fast broadband, working from home and driverless cars helping to reduce the need for car ownership, and its impacts?

Active Travel - Walking and Cycling

- 5.256** The Luton-Dunstable busway connects Houghton Regis and Dunstable to Luton town centre and the airport and it provides a walking and cycling route alongside. National Cycle Network route (NCN606) follows the River Lea corridor connecting Houghton Regis to Luton. However not all areas within the town have effective connections and routes. The council's [Local Cycling and Walking Infrastructure Plan \(2023-2033\)](#) (LCWIP) is a long term plan to develop local cycling and walking networks to improve access between residential areas, key employment areas, Luton's railway stations and local facilities and services.
- 5.257** The council is developing active travel infrastructure improvements along New Bedford Road and Leagrave high-street/road. An e-cycle hire scheme and cycle

training in schools is giving residents the confidence to feel safe using a bike.

- 5.258** Just 59% of the town's population walk or cycle at least once a week, compared to the national average of 71%. Prioritising active travel infrastructure, is vital to reducing emissions from transport, especially the private car and encouraging healthy lifestyles. We will need to explore how our walking and cycling infrastructure, including public rights of way, can be improved, developed and provided for.

Question 51

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

Options

1. Should the Local Plan include policies on the integration of cycling and walking infrastructure with strategic developments whilst also building on the provisions of existing networks and how?
2. How should walking and cycling infrastructure be provided within new sites, for example the provision of cycle storage?
3. Where and how should cycling and walking infrastructure be provided and improved, and are there any areas/routes where it should be focused?

Parking

- 5.259** In Luton a significant proportion of homes have restricted access to or no access to off-street parking and some businesses have limited parking provision. Offices and other commercial premises have been converted into flats under Permitted Development Rights and the population density in some areas has increased. This has resulted in an increased demand for parking permits, illegal parking in some areas and unauthorised car parks being established. Cars inappropriately parked on pavements and verges is common in Luton. This restricts ease of movement and can be dangerous, particularly for vulnerable or disabled people and around schools.

- 5.260** New developments in central Luton will provide new public parking facilities but in other cases lead to the loss of existing parking areas. The council is producing a new Parking Strategy. Our policies will need to be consistent with the strategy and balance the adequate provision of parking against encouraging the use of sustainable modes of transport and active travel. The current Local Plan contains Policy LLP32 which states that parking provision in Luton will be managed to ensure that a proportionate number of spaces are available to support the growth of the town centre.

Question 52

Do you have any views about parking in Luton?

Options

1. Should we seek to further reduce parking provision on new developments?
2. How should the amount of parking in central Luton be managed in light of new development proposals?
3. Should we limit off street parking to particular users such as Blue Badge holders and to particular uses such as electric vehicle charging?
4. How can parking be provided in residential areas? For example should we provide shared parking areas?

Mobility Hubs

- 5.261** The Local Transport Plan 4 identifies the needs for mobility hubs to integrate different modes of transport at railway stations and proposed park and ride sites. Mobility hubs bring together shared transport with public transport and active travel in spaces designed to improve the public realm for all. To enable our plans for mobility hubs to come forward, the council will be investing £1.27 million in electric vehicle charge points and piloting a town-wide car-club, all scheduled to begin in 2025.
- 5.262** Luton railway station is located on the eastern edge of the town centre. The station suffers from

several issues, including poor access to platforms for mobility impaired passengers. Network Rail started work at the station in September 2023 as part of a programme of improvements and upgrades to improve accessibility, which could also be implemented at Legrave Station. Providing quick and frequent links to London, Luton's railway infrastructure provides opportunities for sustainable travel and economic growth as a connection to the wider region.

Options

1. How can planned mobility hubs be brought forward?
2. Should the new Local Plan support the provision of mobility hubs at key strategic sites and other locations?

Infrastructure and Highways

- 5.263** Luton attracts a significant proportion of its workers from outside its boundaries. 80% of employees at the airport for example travel from within Bedfordshire, Hertfordshire and Buckinghamshire. Whilst network connectivity is generally good in and around Luton, there is congestion on key parts of the network. Sections of the ring road that surround the town centre and other radial routes constrain pedestrian and cycle access into the town centre.
- 5.264** Policy LLP 31 in the current Local Plan sets out proposals and areas of safeguarded land for a number of transport schemes. There are a number of primary transport corridors that are key to unlocking and supporting existing and planned housing and economic development. Highway improvements are proposed along Vauxhall Way, Kimpton Road, Chaul End lane and a number of key links and junctions that will need to be enhanced to support plans for Airport expansion, including a new access road to Luton Airport.
- 5.265** A new strategic road to create a northern Luton bypass running from the A6 road to junction 11a of the M1, connecting with the A5 to M1 Link road is proposed just north of

Luton in central Bedfordshire but has yet to come forward.

- 5.266** We will continue to work with neighbouring authorities to ensure development on the periphery of Luton is sustainably connected to key amenities, opportunities and services.
- 5.267** The current Local Plan (Policy LLP33) explains the council's approach to freight recognising its important role in Luton's economy and how impacts will be considered.

The Airport

- 5.268** Luton airport is major transport hub providing for millions of international trips each year and it will continue to play a significant role in the future planning of the town. The number of passengers has increased in recent years. In 2023 the Secretary of State granted permission for an increase in numbers to 19 million a year. A London Luton Airport Travel Plan, with measures to promote sustainable modes for passengers to reduce the impact of private car use, and a London Luton [Airport Surface Access Strategy \(2019\)](#) have been produced. The Airport also published a [Sustainability Report](#) in 2023 that notes that there has been a significant increase in the proportion of passengers travelling to the airport by rail, owing to improved fast train access from central London. Overall, 39% of passenger journeys were made via sustainable modes of travel, surpassing their target. Targets for employees travelling to the airport have also been met.
- 5.269** The DART railway has recently opened increasing the opportunity for sustainable travel to the airport and in the first few months of opening provided transport for 2 million customers. A dual carriageway provides access to the airport for cars and bus services. There is a public safety zone and areas of safeguarding associated with the airport. The approach to public safety zones was updated by the Department of Transport in 2021. Policy LLP34 in the current Local Plan describes the current policy approach to the public safety zone. For the Local Plan we will need to consider the airport's infrastructure requirements, the opportunities it offers for economic growth for Luton and surroundings and potential

impacts going forward including in the context of the Development Consent Order (DCO) net zero targets and any cross boundary considerations.

Question 54

Are there any Issues or Options you think we have not considered in this Chapter?

- 5.270** The council is currently updating its Local Transport Plan which will set out priorities and proposals for the future. Transport schemes will need to continue to be planned and the network managed in the context of significant new development proposals in and around Luton including effective public transport and walking and cycling links provided connecting these to the town. Traffic congestion is a major cost to the local economy and has the potential to constrain future growth. If traffic growth continues due to an overreliance on the private car, many more of our roads will become increasingly congested.
- 5.271** We will be exploring how transport infrastructure can be improved and provided in our Infrastructure Delivery Plan, working in partnership with National Highways, Network Rail, and other public providers to bring forward improvements to infrastructure and services.

Question 53

- What transport infrastructure should be provided or improved and where?

Options

1. How should any new transport infrastructure needed, including to encourage sustainable modes, be provided to serve the airport?
2. What approach should we take to the public safety zone at the airport?
3. How can existing transport infrastructure and routes be changed to facilitate the use of sustainable modes, improve connectivity, safety and the urban environment?
4. What do we need to consider in our approach to delivering transport infrastructure and effective routes to help secure economic growth, including in relation to freight, lorry routes and parking?

Sustainable Infrastructure and Funding



Luton DART

5.272 Planned growth needs to be supported by infrastructure and it is key to supporting economic growth and for providing for the needs of the community. It will be needed for individual development sites and potentially to serve the wider town and sub-region.

5.273 The government is proposing changes to the way public service infrastructure is provided which could see some projects being included in the [Nationally Significant Infrastructure Projects](#) regime such as laboratories, giga factories, data centres, electricity grid connections, the networks that support freight and logistics and wind farms. The [new proposed NPPF \(2024\)](#) sets out a requirement to consider infrastructure provider's investment plans and for a consistent approach to be taken to planning the delivery of major infrastructure.

5.274 Some infrastructure is typically paid for through the Community Infrastructure Levy (CIL), which is a charge levied on new developments by local authorities. Luton does not currently have a CIL in place and infrastructure is therefore currently delivered through legal (Section 106) agreements with developers or grant funding from different agencies or bodies. The council's annual Funding Infrastructure Statement 2022/23 ([IFS](#)) presents Section 106 receipts made by developers and also how it is spent during each financial year. The previous government proposed a new infrastructure levy (IL) which would be a non-negotiable charge on development. However the new government may not continue with this approach.

5.275 The current [Local Plan \(adopted 2017\)](#) requires that infrastructure for sites is provided on-site as part of the development

wherever possible and appropriate and explains the circumstances where financial contributions will be required. The financial viability of providing satisfactory infrastructure to serve new developments can be a challenge, particularly on urban sites.

- 5.276** There is likely to be increasing demand on the network from larger uses of energy, such as data centres, and to cater for the increase in electric vehicles. However there are opportunities for changing the way energy is produced through green technology and from those wanting to supply the network.
- 5.277** The Local Plan will need to show how new developments will be supported by existing and new infrastructure including highway infrastructure if required, public transport, walking and cycling, waste, and utilities infrastructure (gas, water, electricity, telecommunications) as well as social and community infrastructure such as schools and community facilities. Infrastructure provision applies to a wide range of matters and we have set out elsewhere in this document how this could be provided and secured, for example in relation green infrastructure.
- 5.278** We will prepare a new Infrastructure Delivery Plan, working with our partners, infrastructure providers and neighbours where required, to ensure there is a coordinated approach to infrastructure provision and our future development strategy, considering timing of delivery and costs. We will be exploring sources of funding for infrastructure, including how developers will contribute through development proposals. We will also need to consider any planned infrastructure projects already in the pipeline in forming our development strategy.
- 5.279** Planning policies will need to support the expansion of electronic communications and digital and mobile networks as part of a modern economy. The provision of full-fibre broadband will support businesses as well as facilitating home-working for residents, reducing the need for travel.

Question 55

What infrastructure is required in Luton and how should this be provided for?

Options

1. Where are there deficiencies in infrastructure in Luton?
2. Is any new strategic infrastructure needed in order to support and deliver Luton's future growth and development?
3. How should new infrastructure be provided for and delivered, including for individual sites, considering phasing and viability of development?
4. Is there any key infrastructure that should be protected or improved for example minerals distribution facilities?
5. How can we work with infrastructure providers, including utility companies and digital providers, and others to ensure that growth is supported?
6. Should we prioritise particular infrastructure in Luton and why?
7. What do we need to consider in forming our development strategy and policies in relation to infrastructure provision, including potential adverse effects of new infrastructure?
8. How can we work with the suppliers of energy in forming our policies and will supply considerations help determine the location of development?
9. What should we be asking developers to contribute towards on development sites and for the wider town in terms of infrastructure, including community infrastructure?
10. What other things should we be asking for contributions from developers towards?

Question 56

Are there any Issues or Options you think we have not considered in this Chapter?

Existing and new Policies

- 5.280** The [Luton Local Plan 2011-2031 \(adopted 2017\)](#) contains both detailed strategic policies and development management policies. While producing a new Local Plan, we will need to decide whether we want to keep ("save") any of the current policies, which policies to amend, which ones to delete entirely, and determine new policies that we may want to create. We will need to consider government policy and evidence as well as the outcome of consultation during this process.
- 5.281** Policies in a new Local Plan should be succinct and not unnecessarily repeat what is outlined in national policy. We will need to consider the possible introduction of National Development Management Policies (NDMPs) by the government. NDMPs were outlined in the [Levelling Up and Regeneration Act 2023 \(LURA\)](#) and are intended to reduce the number of local policies needed and make producing Local Plans quicker. If introduced, planning applications will be determined against the Luton Local Plan and any national development management policies.
- 5.282** The NDMPs could cover a wide range of topics; setting design standards, mitigating environmental impacts, promoting social and community development, and addressing infrastructure requirements. The new government in its consultation on [changes to the NPPF and other changes to the planning system \(2024\)](#) explains how it intends to explore the creation of a more accessible and interactive, web-based set of national policies (both in the form of National Development Management Policies and national policies for plan-making).

Question 57

Do you have any views about our existing policies and what local development management policies we need?

Chapter 6 - Consultation Arrangements and Next Steps

Making your comments

- 6.1 We are seeking your views on this document, and supporting documents, to enable us to shape our Local Plan for Luton. Please also do make others aware of this consultation and the Local Plan who you think might not be.
- 6.2 We encourage you to use our online consultation portal to make comments. This can be accessed via www.luton.gov.uk/newlocalplan. Alternatively, you can email your response to localplan@luton.gov.uk or send it by post to Freepost Luton Borough Council – Planning Consultation. You can also drop off your response at the Town Hall, Upper George Street, Luton, LU12BQ marked Planning Consultation during the hours above. Comments must be submitted by 5pm on 7 February 2025.
- 6.3 Please note we are unable to accept anonymous responses. When you respond, you must consider and agree to the Privacy Notice with the consultation documents in order for your responses to be considered. All valid responses will be publicly available. However, your contact details will be private

except for your name/organisation. Your details and your comments will be held on our private consultation database so that we can keep you informed. You can contact us at anytime by emailing localplan@luton.gov.uk if you wish to be no longer contacted.

Call for Sites

- 6.4 We are undertaking a call for sites alongside the consultation on this document. We are asking for sites to be submitted to us for consideration for including in the Local Plan going forward. These could be sites for housing, employment, local green space and other uses. We have produced an online form which is available here www.luton.gov.uk/newlocalplan.

Next Steps and Timescales

- 6.5 The following are the key next steps we expect to take in the production of the Local Plan. We will however need to take account of any changes that the government makes to the process for producing Local Plans in the future.



Appendix 1 - Glossary

Accessible and Adaptable Homes: Approved Document M “Access to and use of buildings” Volume 1: Dwellings The Building Regulations 2010, 2015 edition incorporating 2016 amendments – for use in England provides three technical accessibility standards that can be used in new homes:-

- **M4(1) Category 1: Visitable dwellings.** This is the mandatory standard for all new dwellings unless one of the optional requirements M4(2) or M4(3) applies. Sections A and B provisions deal with external approach routes, ramps, stepped or step free approaches and communal entrances and stairs, lifts and private entrances, circulation, door widths, sanitary facilities and services controls.
- **M4(2) Category 2: Accessible and adaptable dwellings.** These homes are designed so that common access adaptations can be installed if needed. Category A and B also provide certain design features from the outset which makes them more usable for many disabled people and older people and includes approaches and entrances, internal space, habitable rooms (kitchens, bedrooms, bathrooms, and living space) as well as step free approaches, entrances, door and circulation space and levels. Sections A and B provisions apply where a planning condition requires compliance with the optional requirements M4(2) for accessible and adaptable dwellings.
- **M4(3) Category 3: Wheelchair user dwellings.** This optional standard will be met where a new dwelling makes reasonable provision for a wheelchair user to live in the dwelling, including the approach, curtilage, step free access, habitable rooms, facilities and service controls or could easily be altered to meet these needs. Sections A relates to specific internal or external areas that form the approach routes to the dwelling falling within the curtilage and access to communal facilities. Section B provisions apply to private entrances, external doors internal spaces, outdoor spaces, garden, balcony or roof terrace. These provisions

apply where a planning condition requires compliance with the optional requirements M4(3) for wheelchair user dwellings.

Affordable housing - housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers).

Air Quality Management Area (AMQA) - Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

Ancient Woodland - An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites.

Aquifer - a body of permeable rock which can contain or transmit groundwater.

Asset of Community Value - A building or other land is an asset of community value if its main use has recently been or is presently used to further the social wellbeing or social interests of the local community and could do so in the future. The Localism Act states that ‘social interests’ include cultural, recreational and sporting interests.

Biodiversity - the variety of plant and animal life in the world or in a particular habitat.

Biodiversity Net Gain - Biodiversity net gain (BNG) is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact (‘net gain’) on biodiversity, compared to what was there before development. In England, BNG is mandatory from 12 February 2024 under [Schedule 7A of the Town and Country Planning Act 1990 \(as inserted by Schedule 14 of the Environment Act 2021\)](#).

BREEAM (Building Research Establishment Environmental Assessment Methodology) - provides a holistic sustainability assessment framework for buildings and infrastructure. It is used to specify and measure the sustainability performance of buildings, ensuring that projects meet sustainability goals and continue to perform optimally over time.

Chalk Stream - a type of lowland river characterised by clear water and a diverse flora. Chalk rivers emerge from the chalk aquifer.

Chilterns National Landscape - a national landscape of remarkable beauty and distinctive character, with a unique interaction of geological, ecological and cultural heritage features. Its dramatic chalk escarpment is globally rare, and creates sweeping panoramic views, criss-crossed by ancient routes and hedgerows, trees, orchards and parkland, weaving across farmland.

Circular Economy - a system based on the reuse and regeneration of materials or products, especially as a means of continuing production in a sustainable or environmentally friendly way.

Culvert - a tunnel carrying a stream or open drain under a road or railway.

Decentralised Energy - energy that is not generated from the main national grid, but is generated locally.

Design codes - a set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area.

District Heating Networks - supply heat from a central source to consumers, via a network of underground pipes carrying hot water. Heat networks can cover a large area or even an entire city, or be fairly local supplying a small cluster of buildings. This avoids the need for individual boilers or electric heaters in every building.

Green Belt - land designated to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Green and Blue Infrastructure - A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

Grey Belt - land in the Green Belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes but excluding those areas or assets of particular importance listed in footnote 7 of the NPPF (other than land designated as Green Belt) (as defined in the July 2024 consultation version of the NPPF)

Groundwater - water held underground in the soil or in pores and crevices in rock.

Habitat Bank - Habitat banking is an approach where investors pay landowners to increase the biodiversity value of their land and this uplift is then sold as units to those that need off-site biodiversity net gain. Often habitat is created in advance of units being sold meaning this is an ecologically beneficial approach.

Habitats Regulations Assessment (HRA) - In accordance with the Habitats Regulations, all competent authorities, must undertake a formal assessment of the implications of any new plans or projects that may be capable of affecting the designated interest features of European Sites before deciding whether to undertake, permit or authorise such a plan or project.

Houses in multiple occupation (HMO) - homes where there are at least three tenants forming more than one household and you share toilet, bathroom or kitchen facilities with other tenants. A large HMO is classified as having at least five tenants.

Index of Multiple Deprivation - The Indices of Deprivation are a unique measure of relative deprivation at a small local area level (Lower-layer Super Output Areas) across England. The Indices of Deprivation 2019 (IoD2019) is the most recent release. The Indices provide a set of relative measures of deprivation for small areas across England, based on seven different domains, or facets, of deprivation: income deprivation; employment deprivation; education, skills and training deprivation; health deprivation and disability; crime; barriers to housing and services; living environment deprivation.

Local Housing Allowance (LHA) - is used to calculate the maximum amount tenants renting from a private landlord can claim in Housing Benefit or Universal Credit.

Net Zero - achieving a balance between the carbon emitted into the atmosphere, and the carbon removed from it. Net zero will be reached when the amount of carbon added to the atmosphere is no more than the amount removed.

Open Space - All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Passivhaus - The passivhaus standard adopts a whole-building approach with clear, measured targets, focused on high-quality construction, certified through an exacting quality assurance process. It typically includes high levels of

insulation, extremely high performance windows with insulated frames and airtight building fabric.

Permitted development rights - allow certain types of work to be carried out without needing to apply for planning permission.

Renewable Energy and Low Carbon Energy

- Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Site of Special Scientific Interest - Sites designated by Natural England under the Wildlife and Countryside Act 1981.

Special Areas of Conservation (SAC) - Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.

Specialised housing - specially designed housing (such as wheelchair accommodation, hostels or group homes) or housing specifically designed for particular groups (such as retirement housing).

Standard method - the NPPF requires Local Planning Authorities to apply the standard method when assessing local housing need. It uses a formula to identify the minimum number of homes expected to be planned for.

Strategic Environmental Assessment (SEA) - considers the environmental effects of a plan.

Strategic Housing Market Assessment (SHMA) - provides the evidence base required to establish the local authority's objectively assessed housing need and provides information on the appropriate mix of housing and range of tenures needed (such as social rented housing, intermediate housing and market housing).

Sustainable Drainage Systems (SuDS) - are designed to manage stormwater locally (as close its source as possible), to mimic natural drainage and encourage its infiltration, attenuation and passive treatment.

Sustainability Appraisal (SA) - A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to

promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

Urban Heat Island - when an urban area is much warmer than its surrounding rural areas.

Appendix 2 - Evidence Base

8.1 The Local Plan will need to be informed by evidence. The following provides a list of the evidence that we plan to collect to inform the Plan at the later stages. This may change as the Local Plan develops.

- **Climate Change Study** - An assessment of current and future carbon emissions, review of energy provision including renewable energy and decentralised systems opportunities, and climate change mitigation and adaption, improving energy efficiency, including in the existing housing stock.
- **Housing and Economic Needs Assessment** - An assessment of housing needs, including mix, type and tenure, and employment needs in Luton and the wider market area
- **Employment Land Review** - An assessment of existing employment land in Luton and the land available for future employment development
- **Retail and Town Centre Study** - Assessment of population projections shopping and leisure patterns, the health of Luton's centres and the type of uses, including hot food takeaways, and future needs considering the needs of those that use the town centre
- **Green Belt Assessment** - An assessment of Luton's green belt including recommendations for any boundary changes or green belt releases.
- **Transport Assessment** - An assessment of our draft strategy and potential sites to examine their suitability and sustainability, any impacts on the network in Luton and surroundings and the transport infrastructure that may be required.
- **Viability Assessment** - An assessment of whether the value generated by a development is more than the cost of developing it, and provide evidence in the form of an appraisal of the viability of the new Luton Local Plan.
- **Infrastructure Assessment** - The study will develop a data base of existing utility, community/health, leisure, education and transport infrastructure capacity and the quantity of future provision to meet needs.
- **Green and Blue Infrastructure Study** - An assessment of Luton's current green and blue infrastructure provision and recommendations on new provision within the borough or improving connections amongst existing provision.
- **Strategic Flood Risk Assessment** - A study that looks at different sources of flood risk within Luton along with how climate change may impact on flood risk. The study should make recommendations on how to reduce risk of flooding.
- **Sequential and Exceptions Test** - An assessment that ensures that development is steered towards locations with the lowest probability of flooding, or that developments will provide wider sustainability benefits whilst being safe for their lifetime and not increasing flood risk elsewhere.
- **Gypsy and Traveller Accommodation Assessment** - A study that looks at existing provision and need for new provision for gypsies, travellers and travelling showpeople in Luton.
- **Water Cycle Study** - An assessment of how strategic plans and development will affect the environment.
- **Open space, sport and recreation study** - An assessment of open space, sports and recreation provision within Luton, including identification of any shortfalls and how those shortfalls could be addressed.
- **Local Green Spaces Assessment** - An assessment of potential local green spaces, identified by the community.
- **Habitats Regulation Assessment** - An assessment to determine whether proposals are likely to have significant effects on protected European sites, and if so, to identify ways on how to avoid or minimise any effects.
- **Landscape and Visual Impact Assessment** - An assessment of the impact of planned development on views and the surrounding landscape, including the Chilterns National Landscape.

- **Historic Environment Assessment** - Appraisals of the conservation areas in Luton and Management Plans for enhancing the unique character of each conservation area.
- **Biodiversity Study** - A review of existing wildlife sites in Luton and how biodiversity net gain credits may be able to be applied to make improvements to those sites.
- **Site Options Assessment** - If required, an assessment of sites for housing, employment and other uses outside of Luton's boundaries

Question 58

Is there any other evidence or information we should be collecting to inform the Local Plan?

Do you have any suggestions on the scope of the evidence outlined and what it should include?



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Luton