

Response Form

Luton Local Plan Community Involvement Paper – Issues & Options (Regulation 18 Document)

What is the purpose of this consultation?

We are producing a new Local Plan for Luton. As part of this process, we are asking for your views in order to shape the new Local Plan. We have produced a Luton Local Plan Community Involvement Paper – Issues & Options (Regulation 18 Document) as well as a shorter Summary Booklet version to help you make your response.

What is the Community Involvement Paper – Issues & Options (Regulation 18 Document)?

The Luton Local Plan Community Involvement Paper - Issues & Options (Regulation 18 Document) explores some of the key issues (and poses questions) facing the future growth of the town over the next 15 years and beyond (e.g. what type of homes and jobs are needed where, how people should travel, what community facilities, open spaces are needed and how to protect our natural and built environment in the face of development and risks of climate change).

How can I comment on the Luton Local Plan Community Involvement Paper – Summary Booklet?

This Response Form is your opportunity to give feedback on the Community Involvement Paper – Issues & Options (Regulation 18 Document) which is being consulted on together with the following documents; Sustainability Appraisal Scoping document; Statement of Community Involvement (SCI); Duty to Cooperate and Consultation Paper 'Call for Sites'; and Local Green Spaces.

To assist you, we have included all of the questions in the main consultation document, numbered and listed under **List of Headings with Questions** after the **Response Box**.

You need to put the heading and question number in the **Response Box** where shown - so we know which topic and question you are answering.

Please use a separate **Response Box** for each numbered question.

We prefer that you use our online Objective portal for making responses directly on the full **Luton Local Plan Community Involvement Paper - Issues & Options (Regulation 18) document** and other consultation documents here: luton.objective.co.uk/kse.

If you are unable to do so or do not have time, please download this form, complete your **Response Box** for each question and either scan and return it via email or print it and post it in as set out below.

However, before sending your response, it is important that you review and agree to the **Privacy Notice** (shown at the end of this document) by ticking the mandatory question in the **Your Details Form** (otherwise we cannot process your responses or legally hold your name and address on our database). You must ensure that your **Response Box** answers are bundled together with at least one copy of a completed **Your Details Form** so we know who is responding and that you have reviewed and agreed to the **Privacy Notice**.

You can also, optionally, choose (tick) to be kept updated as work on the new Local Plan for Luton progresses by being added to our database.

Once completed, please send your printed response in an envelope to:

Freepost Luton Borough Council
Planning Consultation

Or email a scanned copy to: localplan@luton.gov.uk.

Printed copies and forms are available for inspection at the Town Hall, libraries and other places, see details online at: www.luton.gov.uk/newlocalplan. You can also email us at localplan@luton.gov.uk or call 01582 548528 and we can email or post response forms to you.

You can also drop the form off at the Council Offices at the town hall marked for the attention of the Planning Policy Team, 2nd Floor, Luton Town Hall George Street Luton LU1 2BQ

You may prefer to respond to the shorter summary booklet – please see the ‘Luton Local Plan Community Involvement Paper – Summary Booklet’ here: www.luton.gov.uk/newlocalplan.

How we will use your information

Your information will be processed and handled in accordance with the council’s [Privacy Notice](#) and Planning Service specific [Privacy Notice](#).

All comments submitted, via the online portal or otherwise, will be publicly available. Information provided, including the names of those making submissions, will also be made publicly available. Submissions cannot be made and will not be accepted

anonymously. Personal information such as addresses, phone numbers and email addresses will not be made publicly available in accordance with the Privacy Notice.

YOUR DETAILS

To make a valid response, please fill in the details below.

Your name and title (Required): Mark Schnull, Managing Director
Organisation (Optional): Arrow Planning Limited, on behalf of Arnold White Group Limited
Address including post code (Required): Clarks Barn [REDACTED] High Wycombe Bucks [REDACTED]
Email address (Optional): [REDACTED]

Please tick if you wish to be added to our database to be updated on the progress of the new Local Plan (Optional).	<input checked="" type="checkbox"/>
Please review the PRIVACY NOTICE and tick that you agree to it in order for us to process and publish your responses and hold your contact details privately which won't be published (Required).	<input checked="" type="checkbox"/>

We are aiming to receive responses from a wide range of people, and would be grateful if you would provide the following information – all questions are optional (and answers will be held in strict confidence):

	Please tick if prefer not to say?
Age:	<input type="checkbox"/>
Date of birth:	<input type="checkbox"/>
What is your gender?:	<input type="checkbox"/>
Is the gender you identify with the same as your gender registered at birth?	<input type="checkbox"/>
What is your ethnicity?:	<input type="checkbox"/>
Do you consider you have a disability (please specify)?:	<input type="checkbox"/>
What is your sexual orientation?:	<input type="checkbox"/>

What is your religion or belief?:	<input type="checkbox"/>
Are you currently pregnant or on maternity or parental leave?:	<input type="checkbox"/>
Are you married or in a civil partnership?:	<input type="checkbox"/>

Response Box

Topic Heading: Vision & Objectives, Providing Suitable and Sustainable Homes

Question Number:

4, 5 6

Answer:

We write on behalf of Arnold White Group Limited in response to Luton Borough Council's consultation on the new Local Plan. We welcome the opportunity to comment at this early stage and set out our views on key issues, particularly in relation to the Plan period, housing needs, strategic spatial planning, and cross-boundary cooperation.

Plan Period

We note that Luton Borough Council is considering a plan period extending to 2045. Whilst the consultation pre-dated Central Bedfordshire Council's (CBC) very recent decision (30 January 2025) for their Plan Period to run to 2050, we propose that Luton's Plan Period should cover the same period. This is necessary to ensure a long-term planning framework that aligns with the strategic growth requirements of the area, across local authority boundaries, as required in the December 2024 National Planning Policy Framework.

Housing Needs and Unmet Need

The Council's consultation document recognises the stark increase in the Borough's housing need, rising from the current Local Plan's 425 homes per year to 1,463 homes per year under the government's new standard methodology. Given this substantial uplift, it is already apparent that Luton Borough Council will be unable to meet its full housing needs within the Borough's boundary.

Strategic Spatial Planning and Duty to Cooperate

Paragraph 5.7 of the consultation paper rightly acknowledges that the Borough will likely need to export housing need to neighbouring authorities. We support this recognition and encourage early engagement with Central Bedfordshire Council (to whom this letter has been copied) and other Duty to Cooperate partners to ensure that appropriate sites in sustainable locations within the wider Housing Market Area are identified (see below).

The consultation seeks views on the appropriate housing number to propose and the locations for new housing. Question 6, Option 17 asks: "If required, what factors and information should be considered in relation to any new development located outside Luton's boundaries?"

We believe that strategic spatial planning should prioritise locations that are:

- identified as being located within Luton's Housing Market Area (HMA);
- capable of delivering sustainable development at scale;
- well-connected by public transport and existing infrastructure; and
- aligned with the growth strategies of neighbouring authorities.

The evidence to date, which includes previous Local Plan examinations and strategic studies, has identified the Leighton Buzzard area as a sustainable location that can accommodate additional housing need from Luton. Importantly, Leighton Buzzard and its surrounding area already falls within Luton's HMA and has strong existing, and planned, transport links.

Response Box

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Question Number:

4, 5 6

Answer (CONTINUED):

In the event the Borough cannot fully meet its own needs, then Luton Borough Council should advocate for CBC to allocate strategic sites close to settlements such as Leighton Buzzard to contribute to meeting Luton's unmet need. These sites, such as the promoted new stand-alone net-zero settlement known as Eastern Way Quarries*, are very well positioned to deliver housing in highly sustainable locations, in line with the NPPF requirements for meeting housing needs and strategic spatial planning.

Eastern Way Quarries is a net-zero, highly sustainable mixed-use scheme comprised of up to 3,400 new homes, primary and secondary schools, a new Country Park, community facilities and elderly care provision, in addition to sizable employment, infrastructure hubs and on-site renewable energy provision. (see Illustrative Masterplan enclosed at Appendix 1 and Vision Document appended at Appendix 2).

Evidence Base and Next Steps

We note that no updated evidence base has been published alongside the consultation. A robust evidence base, including an updated Strategic Housing Market Assessment (SHMA), Housing and Economic Land Availability Assessment (HELAA), and transport assessments, will be essential in determining where growth should be directed.

Conclusion

Luton Borough Council's recognition of its significant housing shortfall and the necessity of cross-boundary cooperation is welcomed. However, it is imperative that strategic discussions with CBC and other authorities begin immediately to ensure a coordinated approach to growth. The Leighton Buzzard area is well positioned to accommodate a substantial portion of Luton's unmet need alongside CBC's own needs, and we encourage Luton Borough Council to actively promote its inclusion in CBC's future allocations.

We look forward to continued engagement on this matter and would welcome further discussions with the Council and its neighbouring local planning authorities on meeting the housing need of both authorities in the most sustainable way.

LIST OF HEADINGS WITH QUESTIONS

Luton Context

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

Developing our Vision and Objectives

2. What do you think of our draft Vision?
3. What do you think of our draft Objectives?
4. What period do you think our Local Plan should cover?
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?

Providing suitable and sustainable homes

6. How should we establish the number of homes we need to plan for and where should new homes be located?
7. How can we provide affordable housing for Luton and what information should we consider?
8. Thinking about type and size, what mix of homes should be provided?
9. What approach should we take to HMOs in Luton?
10. Should we further encourage people to build their own home and if so how?
11. How should we provide housing for older people and those with specialist needs?
12. What should we consider in ensuring that new homes and outside spaces are the right size?
13. How should we ensure that new housing is accessible and adaptable for those with specialist needs?
14. How can the needs of the travelling community be provided for and where?
15. Are there any Issues or Options you think we have not considered in this Chapter?

Supporting economic development

16. How should we develop Luton's economy going forward?
17. What do you think the future role of the airport should be in terms of contributing to economic growth?
18. How should we ensure that new business investment benefits Luton and its residents?
19. How can we support economic growth and how and where should land be used to achieve this?
20. Are there any Issues or Options you think we have not considered in this Chapter?

Town centres & retail

21. What trends and information should we consider in planning for retail, leisure and services in Luton?
22. What role should Luton have as a retail centre within the sub-region thinking about nearby settlements?

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?
24. How can Luton town centre be improved and what retail, leisure and employment opportunities should we encourage?
25. Should we seek to further restrict the type of development in certain areas of central Luton?
26. Are there any Issues or Options you think we have not considered in this Chapter?

Health and Wellbeing

27. What should we do to address deprivation and improve life outcomes in Luton and what health facilities are required?
28. How could a new Local Plan protect against negative impacts from noise, light pollution and hazardous substances?
29. How can we improve air quality and mitigate against poor air quality?
30. Are there any Issues or Options you think we have not considered in this Chapter?

Addressing and adapting to Climate change

31. How can we adapt to and mitigate against the impacts of climate change? This includes flooding from rivers and rainfall and temperature extremes.
32. How can the Local Plan help Luton be more resilient and adaptive to flood risk?
33. How can we improve water quality in Luton's rivers and improve water efficiency in new developments?
34. Are there any Issues or Options you think we have not considered in this Chapter?

Protecting and enhancing our natural environment

35. How should a new Local Plan approach biodiversity net gain?
36. How can green and blue infrastructure in Luton be improved and enhanced?
37. Are there any local Green Belt or Chilterns National Landscape matters that we need to consider?
38. How can the Local Plan help to conserve and enhance Luton's natural environment?
39. Are there any Issues or Options you think we have not considered in this Chapter?

Community Facilities and Indoor Sport and Recreation

40. What community facilities do you feel need to be enhanced, protected, or new provision provided for within your area?
41. Are there any sites that you consider to meet the criteria for Local Green Space designation?
42. How can the Local Plan help to ensure access to a network of high-quality open spaces?
43. How should the Local Plan approach the potential need for additional burial spaces?
44. Are there any Issues or Options you think we have not considered in this Chapter?

The Historic Environment

45. How can we best conserve and enhance the historic environment in Luton and are there any areas and buildings we should focus on?
46. Are there any Issues or Options you think we have not considered in this Chapter?

Placemaking and design

47. How can we improve the public realm and the design of buildings in Luton and where should this be focussed?
48. Do you think that we should encourage tall buildings in Luton and where should these be located?
49. Are there any Issues or Options you think we have not considered in this Chapter?

Connectivity and transport

50. How do you think we can improve bus services and provide for sustainable modes of transport?
51. How do you think we can encourage more walking and cycling in Luton?
52. Do you have any views about parking in Luton?
53. What transport infrastructure should be provided or improved and where?
54. Are there any Issues or Options you think we have not considered in this Chapter?

Sustainable infrastructure and funding

55. What infrastructure is required in Luton and how should this be provided for?
56. Are there any Issues or Options you think we have not considered in this Chapter?

Development Management Policies

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

Evidence for the Local Plan

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?

PRIVACY NOTICE

We are committed to protecting your privacy when you use our services. This privacy notice explains how we use your information you and how we protect your privacy.

A planning service specific privacy notice is also included below and explains what we do with your data within the planning service, where it is different to the main policy below. We'll also provide information about who we may share your information with and why.

If you have any concerns or questions about how we look after your personal information, please contact us at dataprotection@luton.gov.uk.

***Please note:** the above email address is for data protection queries and subject access requests only.

Data controller

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

Data protection officer

Donna McLeod
Luton Council, Town Hall, George Street, Luton, LU1 2BQ

Planning Service Privacy Notice

We're committed to protecting your privacy when you use our services. We have a data protection officer who makes sure we respect your rights and follow the law.

If you have any concerns or questions about how we look after your personal information, please contact us at dataprotection@luton.gov.uk.

As the planning department for Luton Council, we deal with:

- planning policy
- planning applications (including minerals and waste, listed buildings, trees and high hedges)
- planning enforcement and appeals

Personal data

Personal data we will hold, include:

- name
- address
- email address
- telephone number
- land ownership/ interest details
- signatures

- special category data (such as health conditions, disabilities, bank statements, tenancy agreements etc.)

We receive application information either directly from the application or via a planning agent on their behalf. Information is provided to us via:

- the Planning Portal
- email
- paper copy
- online form
- direct secure access to our document management system
- consultation portal

We also receive comments, representations, allegations, requests and questions via our online planning register planning consultation portal, email, letter and online forms and payments via the planning portal online payment portal, our own online payment portal, via BACS and cheques. The planning service will also be using a drone to improve our information gathering in the Borough to aid our Planning Enforcement investigations, our assessment of planning applications, our monitoring of developments, existing uses and the survey of sites for the potential for site designation for planning policy purposes.

The planning department your personal data to:

- make decisions and provide advice on planning applications
- make planning policies
- work with neighbouring authorities on strategic policies
- respond to allegations of unlawful development
- monitor development
- enter legal agreements, serve notices and promote the best use of land

Lawful basis

Personal data

Article 6 (c) - processing is necessary for the compliance with a legal obligation to which the controller is subject

Article 6(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

Special category data

Article 9(g) – reasons of substantial public interest (with a basis in law). Condition met under paragraph 6 of Schedule 1 of Data Protection Act 2018 – “statutory etc. and government purposes”.

Supporting information

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires that public consultation be carried out as part of the decision-making process for planning applications.

The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the procedure for the adoption of a local plan, which too requires various stages of consultation.

To allow us to make decisions, we must be provided with relevant personal data. In a small number of circumstances individuals will provide us with “special category data” in support of their application (e.g. evidence of medical history). Processing of personal data is necessary to allow us to evaluate the impact of any development or policies in the Local Plan when undertaking its planning functions. For example, the address of a representor’s property may be relevant in this context. We are unable to consider the harm or otherwise from a scheme to the representor’s property or amenities where the representation is anonymised and the location of the property is not disclosed.

We are obliged under the regulations to make some information available on our planning register. This is a permanent record of our planning decisions that form part of the planning history of a site, along with other facts that form part of the “land search”.

Your contact details and comment are recorded on our secure planning system. If you have requested to be entirely anonymised, only your comment will be recorded. If you have submitted an anonymous comment, we will not be able to inform you of any committee and/or appeal details.

Information on Planning Enforcement cases will be reviewed case by case to see what can be disclosed to the public. Any data or information that may be used in future formal litigation will be retained and not disclosed under legal privilege.

Any personal and private information obtained by drone use will only be used internally and not shared publicly or externally unless consented by the individual.

Please see the [Planning Advisory Service’s Planning and GDPR guide](#) for more information.

Who we share your information with:

- other teams and services within Luton Council where law permits, or it is necessary to do so
- the Planning Inspectorate
- planning committees
- external consultees (e.g. fire service, water companies, the police, the environment agency, natural England, historic England, active travel England etc.)

Why we share your information

We are obliged to consult within the council, with external agencies and with residents depending on the nature of your application.

We will make details of planning applications available online so that people can contribute their comments, this will include the applicant/agent's name and address.

We apply redactions to personal contact details e.g. telephone numbers, email addresses and signatures from public view. However, we will continue to hold the unredacted version on our planning system and this can be viewed by planning staff when necessary.

Please note: agents' details are not normally classed as personal data.

We also redact special category data e.g. supporting statements that include information concerning your health and any information deemed confidential e.g. bank statements, tenancy agreements etc.

We will sometimes need to share the information we have with other teams within the council, to receive comments related to the decision-making process.

If you are submitting supporting information which you would like to be treated confidentially or wish to be specifically withheld from the public register, please label this appropriately. You can do this by contacting developmentcontrol@luton.gov.uk.

Planning Enforcement

We will keep completely confidential any details received about a planning enforcement complaint, including the details of the person making the complaint.

Further details regarding this is provided in the Council's adopted  [Planning Enforcement Charter](#).

We will update the complainant on process with an enforcement complaint (as per the Planning Enforcement Charter).

Any automated decision making or profiling

None

Transfer of data to another country

No information within planning is transferred to another country. None of the systems we use are hosted abroad.

The majority of personal information is stored on systems in the UK. But there are some occasions where your information may leave the UK either in order to get to another organisation or if it's stored in a system outside of the EU.

We have additional protections on your information if it leaves the UK ranging from secure ways of transferring data to ensuring we have a robust contract in place with any third party who may transfer it out of the EU.

If we need to send your information to an 'unsafe' location we'll always seek advice from the Information Commissioner first.

Retention ('how long we keep your information for')

The data will be kept in accordance with our retention schedule. We only keep information for as long as it is needed. This will be based on either a legal requirement (where a law says we have to keep information for a specific period of time) or accepted business practice.

Exercising your rights

You have the right to ask us to amend or delete your data as well transfer or limit its use.

Each request will be considered individually. Where we are required to keep your data by law we may be unable to action your request. In all circumstances we will explain our decision making in writing to you.

Please see our main privacy statement using the green button below if you want more information on how:

- we keep your data safe
- to request a change to the records we hold
- to make a complaint