

Luton Borough Council Local Plan

Responses to Community Involvement Paper – Summary Booklet

1. Vision and Objectives – What do you think of our draft Vision?

The draft Vision is broadly supported, particularly the emphasis on:

- Sustainable growth
- Access to services and facilities
- Improving life outcomes

However, there may be an opportunity to strengthen the Vision by more explicitly recognising the role that healthcare infrastructure plays in supporting sustainable growth and healthy communities

While it refers to “accessible community facilities and services”, it does not clearly state how:

- Healthcare services will be **expanded and modernised**
- Infrastructure will keep pace with **population growth**

Suggested addition:

The Vision should explicitly reference:

“Delivering sufficient, accessible and resilient healthcare infrastructure, aligned with population growth and neighbourhood health models.”

2. Objectives – What do you think of our draft objectives?

The objectives are comprehensive and align well with Luton 2040, particularly in relation to:

- Health outcomes
- Inequality reduction
- Infrastructure provision [1](#)

However, they should be strengthened in the following areas:

Opportunities for further development

- Consider whether a more explicit objective relating to healthcare capacity and accessibility would add value.
 - Consider how workforce, service delivery models and alignment with NHS planning could be
- Suggested addition:**

Introduce a specific objective:

“Ensure sufficient healthcare infrastructure (primary, community and acute) is planned, funded and delivered in line with population growth, including through neighbourhood-based care models.”

3. Future Strategy – Views on growth, sites and time period

The strategy should:

- Clearly align **housing growth with infrastructure capacity**, particularly healthcare
- Consider the **cumulative impact of development on services**
- Retain sufficient flexibility to respond to advances in digitisation, artificial intelligence and evolving healthcare delivery models over the next two decades.

Key considerations:

- Growth locations could be assessed with regards to their ability to accommodate healthcare infrastructure and access to health
- The Plan period (potentially to 2050) increases the importance of:
 - **long-term infrastructure planning**
 - flexibility to respond to changing healthcare delivery models

4. Key Issues – What are the main issues in Luton?

In addition to those identified in the document, an additional issue for consideration is the ability of healthcare services and infrastructure to respond to future growth and changing population needs:

- **Pressure on healthcare services**

The document acknowledges that:

- health outcomes are below average
- growth will put pressure on infrastructure

However, it does not fully recognise:

- Existing **capacity constraints in primary and acute care**
- Growing demand for **mental health services, particularly amongst children and young people**, should be recognised alongside pressures on physical healthcare services.
- The **scale of additional demand from planned housing growth**

The Local Plan may benefit from recognising this more explicitly within its consideration of infrastructure and sustainable growth.

Themed Sections

5. Housing – What should policies do?

Policies should:

- Link housing delivery directly to **healthcare infrastructure provision**

- Ensure major developments consider the potential need for new or expanded healthcare facilities, where supported by evidence of population growth and service demand.

Suggested policy approach:

- Introduce **infrastructure triggers** (e.g. new facilities required after certain levels of development)
- Align housing locations with **existing or planned healthcare capacity**
- Consider the housing needs of key workers, healthcare trainees and students, recognising that affordable and accessible housing is an important factor in attracting and retaining the future workforce required to support growth.

6. Economic Development – What should policies do?

Policies should:

- Recognise the link between:
 - **health outcomes and economic productivity**
 - Significant growth and investment proposals across Bedfordshire which will likely increase competition for skilled workers. Policies should support the development, attraction and retention of the workforce needed across health, care, emergency services, education and other essential sectors.
- Support:
 - development of **health and care sectors as key employers**
 - workforce pipelines for health and social care

7. Town Centre and Retail – What should policies do?

Policies should:

- Encourage inclusion of:
 - **healthcare uses (e.g. clinics, diagnostics, community hubs)** in town and district centres
- Support:
 - co-location of health, community and social services

This aligns with **neighbourhood health models** and improves accessibility.

8. Health and Wellbeing – What should policies do?

This is a key area where the Plan should be strengthened.

The document asks:

“The health services we need and where they should be located” [1](#)

Policies could support the delivery of neighbourhood health models, integrated care and community-based services through the provision of appropriately located healthcare and community infrastructure.

- Explicitly plan for:
 - **primary care (GPs)**
 - community health infrastructure
 - integration with social care
 - adequacy, suitability and location of social care and care home provision to ensure future population needs can be met.
- Support delivery of:
 - **neighbourhood health hubs** Which are designed with sufficient flexibility to accommodate future changes in technology, population needs and models of care delivery over the life of the Plan.
- Require:
 - land allocation for healthcare in major developments

Consideration could also be given to safeguarding opportunities for healthcare provision within larger growth areas and aligning planning policy with NHS and Integrated Care Board strategies.

9. Climate Change – What should policies do?

Policies should recognise:

- Climate change will:
 - increase **health risks** (heat, air quality, flooding)
- Healthcare infrastructure must be:
 - **resilient to climate impacts**

10. Natural Environment – What should policies do?

Strongly support:

- Green infrastructure
- Air quality improvements

These contribute to **preventative health**, but should be complemented by:

- **healthcare capacity planning**

11. Community Facilities – What should policies do?

The document highlights:

- gaps in community facilities
- pressure on services [1](#)

Key response:

Healthcare infrastructure may warrant specific consideration within the Local Plan's infrastructure framework, reflecting its role in supporting population growth and community wellbeing.

Policies should:

- Define **healthcare as critical infrastructure**
- Identify:
 - specific requirements (e.g. GP surgeries, clinics)
- Ensure:
 - provision keeps pace with population growth

12. Connectivity and Transport – What should policies do?

Policies should:

- Ensure **access to healthcare facilities** is a key consideration
- Transport infrastructure should be resilient to climate-related disruption, ensuring reliable access to hospitals and maintaining key emergency responder routes during periods of severe weather.
- Consider travel and commuting requirements for key workers, including healthcare, emergency service and education staff.
- Prioritise:
 - walking and public transport access to health services

13. Infrastructure and Funding – What should policies do?

This is an area where additional clarity may be beneficial.

Policies should:

1. Consider how developer contributions, including Section 106 agreements and the Infrastructure Levy, may support healthcare infrastructure.

2. Align funding with delivery

- Identify:
 - capital requirements
 - phasing of infrastructure

3. Consider revenue and workforce

- Recognise that infrastructure must be:
 - **operationally viable**, not just built

Closing statement (optional to include)

The Local Plan rightly identifies growth, inequality and infrastructure as key priorities for Luton's future. **As a key strategic consultee**, Bedfordshire Hospitals NHS Foundation Trust seeks assurance that planned population growth will be accompanied by the healthcare capacity, facilities, workforce, social care provision and funding required to meet future demand. Greater alignment between spatial planning, healthcare planning and emerging neighbourhood health models will be essential to ensuring sustainable growth, improving health outcomes and reducing inequalities across the borough.