

Luton Borough Council Local Plan

Responses to Responses to SEA Scoping Questions

1. Considering the role of the Luton Local Plan... is the scope of the SEA appropriate?

Broadly appropriate, with opportunities for further development.

The SEA appropriately includes population and human health as a theme and recognises wider determinants of health. However, given that the Local Plan will deliver significant housing growth and population increase, the scope could potentially be broadened to include greater consideration of healthcare infrastructure, capacity and service delivery alongside wider health determinants.

In particular, the SEA:

- Focuses on **health outcomes and environmental determinants**
- Could more explicitly consider healthcare infrastructure alongside other critical infrastructure requirements arising from growth.
- Should also provide explicit assessment of the cumulative impacts of environmental, social and economic factors on population health, health inequalities and service demand. Consideration should extend beyond individual risk factors to understand how multiple determinants interact within vulnerable communities.

As the Local Plan must ensure that “**necessary infrastructure is in place to serve new development**”
1, the SEA should explicitly assess:

- Healthcare capacity
- Infrastructure requirements
- Deliverability of services alongside growth

2. Are there any additional plans, policies or programmes...?

Yes.

The SEA should explicitly include and align with:

- NHS Long-Term / 10-Year Planning Frameworks
- Neighbourhood health and integrated care models
- BLMK Integrated Care Board (ICB) strategies and estate plans

These are essential because they:

- Define how services will be delivered (e.g. shift to **community/neighbourhood-based care**)
- Identify infrastructure and workforce requirements
- Ensure alignment between spatial planning and health system delivery

Including these plans and programmes would help ensure closer alignment between the SEA and the healthcare planning, investment and delivery arrangements that will shape future service provision.

3. Is the baseline information provided robust and comprehensive?

The baseline provides a useful starting point but could be strengthened in several areas.

While the SEA includes a “Population and Human Health” baseline, there may be opportunities to expand the evidence base relating to healthcare services, including

- GP capacity and patient-to-list ratios
- Hospital capacity and demand pressures
- Population mental health indicators, particularly for children and young people
- Workforce availability
- Access to healthcare services across the borough
- Social care capacity and care home provision
- Distribution and accessibility of residential and nursing care facilities

Additional information in these areas would contribute to a more comprehensive understanding of the relationship between growth and healthcare demand.

4. Does the baseline information provide a suitable baseline for the SEA?

The baseline is well suited to assessing environmental and social determinants of health, but there may be opportunities to strengthen the evidence relating to healthcare infrastructure and service capacity.

Strengthening the evidence base in these areas would support a more robust assessment of how Local Plan options align with healthcare capacity and provision requirements.

5. Are there any additional key environmental issues...?

Yes.

An additional key issue should be included:

► Healthcare infrastructure capacity and resilience

Given planned growth, the SEA should recognise:

- Increasing **pressure on primary care, urgent care and hospital services**
- The need for:
 - new or expanded facilities
 - neighbourhood health hubs
- The interaction between **growth, inequality, and service demand**

- The interaction between **environmental stressors, deprivation and mental health outcomes**.
- **Climate Change and Health System Resilience**
- The SEA should explicitly consider the health implications of climate change under both a 2°C and 4°C global warming scenario, in line with national adaptation planning. Assessment should include:
 - impacts on population health;
 - implications for health inequalities;
 - additional demand on healthcare services;
 - resilience of healthcare infrastructure; and
 - measures that reduce risks under both expected and severe climate scenarios.

This is an important consideration in ensuring that growth is supported by the infrastructure needed to maintain healthy and resilient communities. Adequate healthcare provision contributes to improved health outcomes, economic productivity and community wellbeing.

6. Is the SEA framework appropriate?

The framework provides a positive foundation but could potentially be strengthened in several areas

The framework includes an objective to:

- “Improve public health and encourage healthier lifestyles”

However, it:

- The focus on **prevention and environmental factors is welcomed** – it could potentially give greater emphasis to healthcare delivery and infrastructure considerations.
- The assessment framework should retain sufficient flexibility to reflect future changes arising from **digitisation, artificial intelligence**, remote healthcare models and evolving service delivery approaches over the plan period.

To be appropriate for a growth-led plan, the framework should also assess:

- Availability and accessibility of **healthcare services**
- Alignment with **population growth**

7. Does the SEA framework include a suitable set of objectives...?

The objectives address health effectively in a broad sense, although consideration could be given to whether more explicit reference to healthcare infrastructure and service capacity would add value.

The current objectives:

- Address health in a broad, preventative sense
- Do not include an objective ensuring:

- adequate healthcare provision
- infrastructure delivery

Suggested addition:

“Ensure sufficient, accessible and resilient healthcare infrastructure is delivered to meet population needs arising from development.”

Inclusion of such an objective would help strengthen the SEA's ability to assess whether Local Plan options are supported by sufficient healthcare infrastructure and service capacity.

8. Is there anything that you think we have missed from the scoping report?

Yes – additional areas that could be considered:

- Healthcare infrastructure planning and capacity.
- The relationship between population growth and healthcare demand.
- Mental health infrastructure and demand, particularly for children and young people.
- Social care capacity, care home provision and integration with healthcare planning.
- Infrastructure delivery and funding mechanisms.
- Workforce availability across health and social care and the potential effects of wider regional growth on recruitment and retention.
- Accessibility of healthcare services and geographic variation in provision.
- Assessment of cumulative health impacts arising from the interaction of multiple environmental and socio-economic factors.

9. Do you have any specific comments to make...?

Yes.

The SEA Scoping Report provides a strong foundation for assessing health and wellbeing impacts. As the evidence base evolves, there may be opportunities to further strengthen consideration of healthcare infrastructure planning, particularly in light of planned growth, existing service pressures and emerging neighbourhood health models.

It is important that consideration should also be given to ensuring that emerging neighbourhood health hubs and community facilities are designed with sufficient flexibility to respond to future demographic, technological and service delivery change

Greater clarity regarding healthcare infrastructure planning, funding and delivery could help ensure that health considerations are fully integrated into the assessment of growth options.

The accompanying Community Involvement Paper highlights the importance of ensuring that infrastructure is in place to support development. There may be an opportunity to provide greater clarity regarding how healthcare infrastructure requirements will be identified, planned, funded and delivered alongside growth, including the potential role of developer contributions and other infrastructure funding mechanisms.

Further consideration of these issues would help support the integration of healthcare planning within the wider infrastructure planning framework.

10. If you have commented above... what paragraph/table/figure?

Comments relate to:

- Chapter 3: Baseline – Population and Human Health
- Chapter 5: SEA Objective 13 (Public Health)
- Chapter 4: Key Sustainability Issues
- Chapter 2: Review of Plans and Programmes (opportunity to strengthen alignment with NHS and ICB strategies)

And more broadly:

- The treatment of **healthcare infrastructure within the SEA framework** and opportunities to strengthen its consideration alongside growth and infrastructure planning

There are also cross-cutting references relating to:

- infrastructure planning;
- growth and development; and
- community facilities and service provision.

The Local Plan and SEA process provide an opportunity to strengthen the alignment between spatial planning and healthcare planning. Recognising healthcare infrastructure as a key component of sustainable communities will help support healthy populations, reduce inequalities and ensure that future growth is accompanied by the services and infrastructure required to meet local needs.