

Response to Luton Local Plan Review – Scoping Consultation (June 2026)

1. Introduction and role of the PCC

The Bedfordshire Police and Crime Commissioner (PCC) welcomes the opportunity to respond to the Luton Local Plan Review Scoping Consultation.

The PCC has a statutory responsibility to secure an efficient and effective police service and to work with partners to reduce crime, prevent harm, protect the most vulnerable, and build public confidence in policing and community safety.

The PCC strongly supports the Council's early-stage engagement through this scoping consultation and welcomes the ambition to align the emerging Local Plan with the Luton 2040 Vision. The recognition that the Plan must address not only housing and economic growth, but also social justice, safety, health, and wellbeing, is particularly important in a densely populated urban area such as Luton.

Planning policy is a key lever in shaping the social, environmental, and physical conditions that influence crime, anti-social behaviour, exploitation, public safety, and inequality. Embedding these considerations at an early stage will be critical to delivering a safer and more inclusive Luton by 2040 and beyond.

2. Social justice, inequality and inclusive growth

The PCC welcomes the strong emphasis within the draft Vision and Objectives on addressing deprivation, inequality, and poor health outcomes.

Evidence consistently shows that deprivation, exclusion, overcrowded or poor-quality housing, and limited access to services are strongly associated with higher levels of crime, violence, and exploitation, particularly affecting children, young people, and vulnerable adults.

The Local Plan should therefore:

- Embed social justice and reducing inequality as core principles across all policies
- Support inclusive growth that benefits existing communities as well as new development
- Address child poverty, which is particularly acute in Luton, as a long-term driver of vulnerability and crime
- Ensure equitable access to education, employment, health services, green space, and community facilities

- Provide a balanced mix of housing types, sizes, and tenures to avoid concentrations of disadvantage
- Consider the implications of high-density urban living, including overcrowding and housing subdivision

A clear focus on inclusive and equitable growth will support improved life outcomes and contribute directly to safer communities.

3. Designing out crime and creating safe, inclusive places

The PCC strongly supports the draft objective to create “safe, inclusive communities” and recommends that crime prevention and community safety are embedded throughout the Local Plan, rather than considered at a later stage.

The Local Plan should:

- Require the consistent application of Secured by Design principles
- Promote high-quality placemaking, including natural surveillance, active frontages, clear sightlines and legible street layouts
- Address safety in high-density developments, including flats, HMOs and mixed-use schemes
- Consider community safety in the design and management of:
 - Town centre spaces
 - Transport hubs and interchanges
 - The night-time economy
 - Public realm and green spaces
- Require early engagement with policing and community safety partners on major and complex schemes

Particular attention should be given to designing out crime in areas already experiencing anti-social behaviour and in regeneration areas within the town centre.

Designing safe environments will reduce demand on policing and improve public confidence.

4. Safer communities and preventing harm

The PCC welcomes the consultation's recognition of crime, anti-social behaviour, and health inequalities as key issues.

The Local Plan should prioritise prevention through placemaking and infrastructure design, with particular focus on:

- Violence reduction, including serious violence among young people
- Protecting women and children, including safer streets, public spaces and transport
- Anti-social behaviour, particularly in the town centre and neighbourhood centres
- Exploitation and safeguarding risks, including child criminal and sexual exploitation
- The relationship between poor housing conditions and harm

In a compact and intensively developed urban environment like Luton, these issues are often amplified and require coordinated spatial and social responses.

5. Connectivity, transport and road safety

The PCC strongly supports the Local Plan's focus on reducing car dependency and improving sustainable transport.

Road safety must be embedded as a core component of this approach.

The Local Plan should:

- Reflect the Highway Code hierarchy of road users, prioritising pedestrians, cyclists and other vulnerable users
- Embed the Safe System approach, reducing both the likelihood and severity of collisions
- Design streets to support safe speeds through layout and place-based design
- Address congestion and poor air quality, which contribute to both safety risks and wider harm
- Ensure safe and accessible routes to schools, the town centre and transport hubs
- Support infrastructure for emerging transport modes such as e-bikes and e-scooters
- Provide appropriate electric vehicle infrastructure

In addition, a whole-system approach should include:

- Continued support for education and behaviour change programmes
- Partnership working through the Bedfordshire Road Safety Partnership
- Engagement with businesses, including fleet and gig economy operators, to improve driving standards

This integrated approach is essential in a town with high levels of congestion, commuting, and urban movement.

6. Housing, density and community safety

Given Luton's constrained geography and reliance on higher density development, the Local Plan must carefully consider how housing design impacts safety and wellbeing.

The PCC recommends that policies:

- Address crime and management issues linked to:
 - Overcrowding
 - Sub-division of properties
 - Houses in Multiple Occupation (HMOs)
- Ensure sufficient space standards and quality of accommodation
- Promote well-managed, secure communal areas in flatted developments
- Avoid poorly designed layouts that create hidden or unsafe spaces

Housing quality and management are critical components of crime prevention in Luton's urban context.

7. Infrastructure, growth and policing demand

The PCC strongly supports the emphasis on infrastructure planning.

New development must be supported by appropriate infrastructure from the outset, including consideration of impacts on:

- Policing demand
- Emergency response times
- Road safety and traffic management

- Community safety services

In Luton, where infrastructure is already under pressure, it is particularly important that:

- Development does not exacerbate congestion or restrict emergency access
- Road layouts allow safe movement and adequate access for emergency vehicles
- Parking provision is carefully designed to avoid obstruction and unsafe conditions
- Infrastructure contributions reflect community safety needs
- The Plan should also take account of the proposed expansion of London Luton Airport, ensuring a coordinated approach to road traffic management, surface access, and associated impacts on congestion, safety, and emergency service response capacity.
- The use of Section 106 obligations is always applied to ensure that developers contribute appropriately to community safety and policing infrastructure, including through formal consultation with statutory partners such as the police and the Police and Crime Commissioner to identify local needs and mitigate the impacts of development

The cumulative impact of growth must be fully considered.

8. Town centre, economy and the night-time environment

The PCC welcomes the focus on improving the town centre and supporting economic growth. He also welcomes the focus on community safety of the town centre, and recognises that a vibrant town centre requires ongoing investment, more than a requirement in law enforcement.

The Local Plan should:

- Address safety and anti-social behaviour in town centre areas
- Promote a safe and inclusive night-time economy
- Balance uses such as hospitality, retail and residential development
- Manage the concentration of hot food takeaways and associated issues
- Improve lighting, visibility, and natural surveillance in public spaces
- Encourage footfall and activity to support informal guardianship

A vibrant town centre must also be a safe and well-managed space.

9. Alignment with the Police and Crime Plan and Luton 2040

The PCC welcomes the strong alignment between the draft Local Plan objectives and the wider Luton 2040 Vision.

The Local Plan can play a key role in delivering the PCC's priorities to:

- Prevent crime and reoffending
- Protect vulnerable people
- Reduce violence and harm
- Build safer, more confident communities

This can be achieved through:

- Early intervention via access to youth services, education, and employment
 - Designing environments that discourage crime
 - Supporting community cohesion and social connection
 - Embedding partnership working across all stages of planning and delivery
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10. Ongoing engagement and cross-boundary working

The PCC welcomes the early stage of engagement and supports continued structured involvement as the Local Plan progresses.

This should include:

- Early input from policing and community safety partners in policy development
- Use of community safety evidence to inform site allocations and policies
- Alignment with neighbouring authorities, including Central Bedfordshire, and Bedford Borough and Hertfordshire, recognising cross-boundary crime and transport patterns
- Joint working on infrastructure, transport, and growth impacts
- Ensuring statutory consultation with policing bodies is embedded within planning processes, including through Section 106 negotiations and major application stages, to support effective, evidence-led decision-making

Given Luton's role within a wider functional economic and transport area, cross-boundary coordination is essential.

The PCC also emphasises the importance of place-based interventions that respond to the specific needs, risks and assets of individual neighbourhoods. Targeted, locally informed approaches—developed in partnership with communities, local authorities, policing, health, education and the voluntary sector—are critical to addressing complex and interrelated issues such as violence, exploitation and anti-social behaviour. Embedding partnership-led, place-based delivery within the Local Plan will support more effective prevention and sustainable improvements in community safety.

11. Conclusion

The Bedfordshire PCC supports a Local Plan that delivers a transformational, inclusive and safe vision for Luton.

By embedding:

- Social justice and inequality reduction
- Designing out crime
- Safe, inclusive and high-quality neighbourhoods
- Road safety and sustainable transport
- Infrastructure aligned to policing and emergency service demand

the Local Plan can play a critical role in achieving the ambitions of the Luton 2040 Vision and creating safer, healthier and more resilient communities.

The PCC looks forward to continued partnership working as the Plan develops.