

Dear Sir/Madam,

Re: Luton Local Plan Review – Protective Security and Safety Consultation Response

Thank you for the opportunity to comment on the draft Luton Local Plan Review. We support the Borough's aims of sustainable growth, regeneration and high-quality design. However, the plan should give greater weight to protective security, counter terrorism and resilience to ensure places remain safe, inclusive and sustainable.

Terrorism remains a real and unpredictable threat in the UK. Details of the current national threat level can be found on the Security Service website. ¹

Recent attacks in the UK have demonstrated that there remains terrorist intent to target members of the public at a broad range of venues and public spaces. ²

The National Planning Policy Framework ³(NPPF) (Dec 2024) explicitly requires planning to “*anticipate and address possible malicious threats*” in places where people gather and to take “*appropriate and proportionate steps... to reduce vulnerability, increase resilience and ensure public safety*” (**para. 102**). It further emphasises that layouts and design should be informed by the latest advice from police and other agencies. This aligns with wider NPPF objectives to create places that are “*safe and accessible*” so that crime (and fear of crime), do not undermine community cohesion (**para. 96(b)**), “*create places that are safe, secure and attractive*” (**para. 117(c)**), and the overall strategy make sufficient provision for infrastructure, including security (**para. 20(b)**). This policy aligns with the principles of the forthcoming Protect Duty (also known as Martyn's Law),⁴ which will require certain premises and events to assess and mitigate terrorist threats.

The promotion of counter terrorism design principles aims to create safer places and buildings so that people are better protected from terrorist attack. As with any design considerations, it is most effective if counter terrorism protective security measures are considered as early as possible in the planning and development process. ⁵

¹ [Threat Levels | MI5 - The Security Service.](#)

² [Terrorism \(Protection of Premises\) Act 2025: Statutory guidance \(accessible\) - GOV.UK](#)

³ [National Planning Policy Framework - GOV.UK](#)

⁴ [Martyn's Law | ProtectUK](#)

⁵ [Crowded Places: The Planning System and Counter-Terrorism](#)

Secured by Design⁶ (SBD) and Crime Prevention Through Environmental Design

(CPTED): ⁷ We welcome references to “safe” and “inclusive” design in the Vision/Objectives but recommend explicit mention of SBD (the police-endorsed design standard) and crime prevention principles. SBD is proven to reduce crime and is already expected in major schemes across the UK. This is referenced in the response from Bedfordshire Police Designing Out Crime Officers (DOCOs).

CPTED e.g. natural surveillance, lighting, defensible space should be embedded in policy. The plan could, for example, require new communities and buildings to pursue SBD accreditation, as is now common in other areas for example London.

Hostile Vehicle Mitigation (HVM)⁸ and Public Realm Security⁹: New developments (especially town centres, transport hubs, public plazas) will increase pedestrian flows. The Plan should require proportionate HVM measures to protect crowded places, consistent with the national ‘Crowded Places’ guidance¹⁰. For example, major sites should manage vehicle access points and integrate measures (bollards, planters, landscaped barriers) sensitively into streetscapes. Designers should avoid “barrier” approaches that clash with good public realm design; instead, HVM can be achieved through well-designed streets, planters and street furniture that double as security elements. Security measures should be balanced with accessibility, which requires town centre regeneration and other large venues to “minimise their vulnerability to a terrorist attack” while still protecting people.

Transport and Infrastructure: Transport interchanges (rail/bus/airport links) are high risk nodes. Policy should ensure these are safe, secure and resilient: e.g. CCTV coverage, lighting, clear visibility, secure cycle parking, and structural resilience (blast hardened structures where needed). New policies for active travel routes should not preclude security (e.g. low-level planter strips can protect cycleways). Infrastructure networks should be assessed for resilience against targeted attacks. The plan already promotes public transport and connectivity, but should also require that design of stations, stop points and corridors incorporates safety (layout that prevents ambush points, appropriate lighting and monitoring).

⁶ [Secured by Design - Secured by Design](#)

⁷ [Crime prevention through environmental design | College of Policing](#)

⁸ [Hostile Vehicle Mitigation \(HVM\) | Blog | NPSA](#)

⁹ [Public Realm Design Guide for Hostile Vehicle Mitigation | Hostile Vehicle Mitigation \(HVM\) | NPSA](#)

¹⁰ [Crowded Places: The Planning System and Counter-Terrorism](#)

Public Realm and New Town Centre: Luton's regeneration will create new crowded places (Power Court, hotels, cultural venues). A crowded place is a location or environment to which members of the public have access that may be considered potentially liable to an attack by virtue of its crowd density. Crowded places will be found in a wide range of locations including sports stadia, pubs, clubs, bars, shopping centres, high streets, visitor attractions, cinemas, theatres and commercial centres. Crowded places can also include the public realm - open spaces such as parks and squares.

The Stage and the new Luton Town Football Club are prime examples of crowded places included in the review and should be treated as "crowded places" in planning terms. For example, developer contributions or design briefs should allow funding for security infrastructure (e.g. street furniture that serves as HVM). Event spaces should have design parameters for evacuation and open sightlines. The mix of uses (day and night economy) must include considerations of lighting, CCTV and on-site management to mitigate anti-social behaviour and potential threats.

Emergency Access and Evacuation¹¹: High-density developments and tall buildings require robust evacuation plans. Policies should ensure emergency service access is maintained (no gated alleyways without breakaway planters, etc.), and that assembly/refuge areas are provided. This supports both routine fire safety and less likely terrorist evacuation scenarios. For example, tall building policies can require simultaneous evacuation capability and secure safe rooms if appropriate.

Critical Infrastructure and Resilience: While the Plan discusses resilience to flooding and climate change, it should also address deliberate threats to infrastructure (e.g. communications, energy). Strategic corridors (rail, power lines) should be safeguarded, and major utilities developments (water treatment, power substations) should note security best practice. The plan should build in "backup and protection" features for important buildings or services, so they can keep working during disruptions (like power cuts, cyber attacks, or emergencies).

¹¹ [Evacuation, Invacuation and Lockdown Guidance | Incident Management | NPSA](#)

Early Engagement with Police and CT Advisors: We strongly encourage policy language that expects applicants to consult the Bedfordshire DOCOs and Counter Terrorism Security Advisors (CTSA) at an early stage.

This approach reflects established national best practice. In some areas, local planning policies explicitly require engagement with DOCOs or CTSA's for major developments.

Early engagement ensures that proposals fully integrate proportionate protective security measures, such as hostile vehicle mitigation (HVM), CCTV and access control, from the outset, avoiding the need for costly retrofitting at later stages.

We therefore recommend the inclusion of a requirement, through local validation criteria for major planning applications, for a 'Safer Places / Security Statement'. This should demonstrate how relevant police and security guidance has been considered and embedded within the design of the scheme.

Summary: In conclusion, we welcome Luton's regeneration plans but urge the Council to embed protective security into the plan's objectives and policies. Explicit policy on Security and Resilience (as above) would ensure growth does not inadvertently increase risk. This aligns with national policy (NPPF 2024) and upcoming legal duties, and will ultimately support safer, more sustainable places. We would be pleased to assist further in refining wording or advising on specific projects.

Yours faithfully,

Laura Chalmers on behalf of the CTSA Team

Counter Terrorism Security Advisor

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