

Dear Planning Policy Team,

Please find below Gladman's response to the Scoping Consultation questions for Luton Borough Council.

Chapter 3 - Luton Context

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

Not applicable at this stage.

Developing our Vision and Objectives

2. What do you think of our draft Vision?
3. What do you think of our draft Objectives?

Gladman support the vision of providing a range of high quality, energy efficient new homes, including adaptable housing, homes to meet specialist needs and affordable homes. We further support the notion of new development prioritising active travel and ensuring high standards of connectivity, placing development in key service areas that make sustainable lifestyles a priority.

Our Strategy

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?

Paragraph 22 of the NPPF confirms that the minimum end date of a local plan should be 15 years from adoption. The Scoping Consultation confirms that the plan period will run until 2040, meaning a plan period of 20 years, and no less than 15 years from the date of adoption. The most appropriate place for housing is the edge of existing towns,

for Luton these locations tend to lie outside of the planning jurisdiction of Luton Borough Council but will still contribute to the identified housing need of the borough.

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. a) Are there any Issues, Priorities or Options you think we have not considered in this Chapter?
b) Should our current Local Plan policies be retained or change and how?

The number of homes needed for the borough should be identified through a local housing need assessment, conducted as part of the scoping process for the new local plan. From the identified need of housing, these provisions must come from neighbouring authorities mainly (Central Bedfordshire and North Hertfordshire), meaning effective cooperation is necessary in order for Luton to be able to meet the housing requirement, albeit being providing in neighbouring authorities.

Appropriate types and tenures of housing should also be considered, higher density developments, which are encouraged under the draft NPPF in areas near railway stations, are supported by Gladman provided they are in a suitable location and of high quality design. Accessible and adaptable homes should be incorporated in new policy to ensure that the changing needs of the population are met.

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. a) Are there any Issues Priorities or Options you think we have not considered in this Chapter?
b) Should our current Local Plan policies be retained or change and how?

Not applicable at this stage.

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. a) Are there any Issues Priorities or Options you think we have not considered in this Chapter?
b) Should our current Local Plan policies be retained or change and how?

Not applicable at this stage.

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. a) Are there any Issues Priorities or Options you think we have not considered in this Chapter?
b) Should our current Local Plan policies be retained or change and how?

Promoting healthy and safe communities' forms a key tenet of the NPPF. Section 8 sets out how planning policies and decisions should aim to achieve healthy, inclusive and safe places covering a number of elements that contribute to everyday residential amenities.

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. a) Are there any Issues Priorities or Options you think we have not considered in this Chapter?
b) Should our current Local Plan policies be retained or change and how?

The planning role has an important role to play when it comes to tackling the climate change emergency. In this respect, the overarching environmental objective of sustainable development cited in paragraph 8 of the NPPF highlights how the planning system should help to mitigate and adapt to climate change and support the transition to a low carbon economy.

Luton Borough Council have declared a climate emergency and Gladman is committed to contributing towards providing solutions to address these concerns. Gladman takes climate change seriously and our various land interests can deliver numerous environmental commitments to assist the Council in meeting its climate related strategies:

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. a) Are there any Issues, Priorities or Options you think we have not considered in this Chapter?
b) Should our current Local Plan policies be retained or change and how?

The conservation and protection of the natural environments are key aims of the NPPF, as set out within Sections 15. Plans should outline positive strategies for conservation and enjoyment. A proportionate approach should be utilised to ensure that suitable protective measures are actioned and policies do not exaggerate the importance of assets to the detriment of other aspects of the Local Plan, for example restricting otherwise sustainable development sites.

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. a) Are there any Issues Priorities or Options you think we have not considered in this Chapter?
b) Should our current Local Plan policies be retained or change and how?

Not applicable at this stage.

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. a) Are there any Issues, Priorities or Options you think we have not considered in this Chapter?
- b) Should our current Local Plan policies be retained or changed and how?

The conservation and protection of the historic environments are key aims of the NPPF, as set out within Sections 16. Plans should outline positive strategies for conservation and enjoyment. A proportionate approach should be utilised to ensure that suitable protective measures are actioned, and policies do not exaggerate the importance of assets to the detriment of other aspects of the Local Plan, for example restricting otherwise sustainable development sites.

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. a) Are there any Issues, Priorities or Options you think we have not considered in this Chapter?
- b) Should our current Local Plan policies be retained or change and how?

Not applicable at this stage.

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. a) Are there any Issues, Priorities or Options you think we have not considered in this Chapter?
- b) Should our current Local Plan policies be retained or change and how?

Not applicable at this stage.

Sustainable infrastructure and funding

55. What infrastructure is required in Luton and how should this be provided for?

56. a) Are there any Issues, Priorities or Options you think we have not considered in this Chapter?

b) Should our current Local Plan policies be retained or change and how?

Not applicable at this stage.

Existing and new Policies

57. Do you have any views about our existing policies how well they are working and what local development management policies we need?

Not applicable at this stage.

Appendix 2 Evidence for the Local Plan

58. a) Is there any other evidence or information we should be collecting to inform the Local Plan?

b) Do you have any suggestions on the scope of the evidence outlined and what it should include?

It should be noted, that there have been instances where Local Plans seek to go above and beyond the requirements set within the Future Homes and Building Standards. These policies are normally subsequently amended or removed entirely after the consultation period, as they unnecessarily repeat national legislation or contradict it.

