

From: [Xavier Preston](#)
To: [LBC Local Plan](#)
Subject: HCC response to the Luton Local Plan Scoping Consultation
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Dear Planning Policy at Luton,

Thank you for consulting Hertfordshire County Council on this Local Plan Scoping Consultation. Please do see below responses from the [Growth and Infrastructure Unit](#) and [Transport for Hertfordshire](#) teams that have a strategic cross-boundary interest in the Luton Local Plan.

Included below are only the questions that Hertfordshire County Council considers it appropriate to respond to;

Question 1 Is there anything important we have not mentioned about Luton and its surroundings?

[Transport for Hertfordshire Response](#)

Yes.

The document should place greater emphasis on the role that transport and movement plays in supporting wider objectives relating to housing, economic growth, public health, climate change and placemaking.

Given Luton's position as a major employment, education and transport hub, there should also be greater recognition of cross-boundary travel patterns and the impacts that growth within and around Luton can have on neighbouring authorities, including Hertfordshire.

Transport should be considered throughout the Local Plan rather than principally within a standalone chapter.

Question 3 What do you think of our draft Objectives?

[Transport for Hertfordshire Response](#)

Broadly supported.

Objectives relating to active travel, public transport, reducing dependency on private car travel and coordinating infrastructure provision are welcomed.

However, the Local Plan should more clearly recognise the contribution that transport makes towards delivering wider objectives relating to housing, economic growth, health and environmental outcomes. Transport considerations should be embedded throughout the Plan.

Question 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?

The HCC Growth and Infrastructure Unit is commenting only from a position of social infrastructure, therefore for our Unit, School Planning as you will be aware is a challenging endeavour to plan and therefore any developments near to the border need to consider their impacts and whether the level of social infrastructure included in the plan is sufficient to fully mitigate the development and is of an appropriate scale to not affect the development viabilities meaning that the planned infrastructure provision has a strong chance of being actually delivered. To maximise the possibility of successful outcomes for developments on/ near to administrative boundaries, HCC cannot emphasise enough the importance of effective collaborative working at the earliest stages of Plan Making. This ensures that the opportunities possible from development are maximised, in particular that infrastructure is delivered at an appropriate scale and at the time it is needed.

[Transport for Hertfordshire Response](#)

The future strategy should integrate transport and land-use planning from the outset.

Growth should be directed towards locations that are well served by public transport and where opportunities exist to increase travel by walking, wheeling and cycling.

The strategy should also recognise the importance of strategic transport corridors and the need to understand and address cross-boundary transport impacts through early engagement with neighbouring authorities and infrastructure providers.

Question 6 How should we establish the number of homes we need to plan for and where should new homes be located?

[Growth and Infrastructure Unit Response](#)

New homes and businesses should be located where they can support existing social infrastructure or be delivered at an appropriate scale that they can support the provision of new social infrastructure. Development of a moderate size (too large for existing services to support the growth but too small to fund new provisions) adds significant stress to infrastructure and may have knock on impacts beyond the border. Any homes positioned along the Hertfordshire border should be coordinated with Hertfordshire to avoid additional pressures on Hertfordshire infrastructures. Housing allocations should be chosen on a decide and provide basis, whereby the infrastructures are planned proactively to mitigate the developments rather than by passive approaches.

Housing and jobs should be planned together, with an emphasis on eliminating long commutes to work, particularly out of the Luton area. A focus for the Highway network is to improve network efficiency, reduce carbon emissions and

reduce peak congestion. Any employment or housing strategy should align with wider transport networks and labour markets.

Transport for Hertfordshire Response

New homes should be located in places that provide good access to employment, education, services and facilities by sustainable transport modes.

The transport impacts of growth, particularly where development is proposed close to administrative boundaries, should be assessed through shared evidence and ongoing collaboration with neighbouring authorities.

Infrastructure requirements should be identified early and aligned with planned growth.

Question 17 What do you think the future role of the airport should be in terms of contributing to economic growth?

Any growth to the Airport should have consideration to the ground infrastructure capacity supporting it and growth at the airport should be met with equal mitigation to ground infrastructures.

Question 19 How can we support economic growth and where should employment land be located?

Transport for Hertfordshire Response

Support in principle.

Employment development should be directed towards locations that are accessible by a range of transport modes and can support sustainable travel choices.

The Local Plan should seek to reduce the need for long-distance commuting where possible, whilst recognising the important economic relationships that exist across administrative boundaries.

Consideration should also be given to freight movements, servicing requirements and the efficient operation of strategic transport networks.

Question 24 How can Luton Town Centre be improved?

Transport for Hertfordshire Response

Support measures that improve accessibility to and within the town centre by walking, wheeling, cycling and public transport.

Any changes to parking provision should be accompanied by improvements to sustainable transport options to ensure that access to employment, retail, leisure and community facilities is maintained.

Question 27 What should we do to improve health outcomes in Luton?

Transport for Hertfordshire Response

Support.

Walking, wheeling, cycling and public transport can make an important contribution towards improving public health outcomes and reducing health inequalities.

The Local Plan should promote development patterns that make sustainable travel choices convenient, attractive and accessible to all users.

Question 40 What community facilities need to be enhanced, protected or provided?

Transport for Hertfordshire Response

Community facilities should be located where they are accessible by sustainable modes of transport and integrated with existing public transport networks.

Infrastructure requirements arising from growth should be considered on a cross-boundary basis where appropriate.

Question 50 How can we improve bus services and provide for sustainable modes of transport?

Transport for Hertfordshire Response

Strong support.

The Local Plan should:

- Support high-quality bus services and public transport connectivity.
- Safeguard and enhance strategic public transport corridors.
- Promote integration between different transport modes.
- Support improvements to cross-boundary public transport services.
- Encourage continued collaboration with neighbouring authorities and transport providers on strategic transport initiatives.

Many journeys associated with employment, education, healthcare and leisure cross local authority boundaries. Public transport planning should therefore be undertaken collaboratively.

The Plan should also support efforts to reduce barriers to movement across administrative boundaries through coordinated approaches to public transport information, ticketing and service integration.

Early engagement on future strategic public transport initiatives and mass transit opportunities that improve cross-boundary connectivity is encouraged.

Question 51 How can we encourage more walking and cycling?

Transport for Hertfordshire Response

Walking and cycling networks should be planned as connected networks that link communities, services, employment areas and neighbouring authority areas.

The Local Plan should support safe, direct and attractive routes and ensure active travel infrastructure is integrated into both existing and new developments.

Question 52 (and any infrastructure-related transport questions)

Transport for Hertfordshire Response

Transport infrastructure should be planned alongside development and delivered at the appropriate time to support growth.

The Local Plan should support:

- Early identification of transport requirements.
- Appropriate assessment of cumulative impacts.
- Ongoing cross-boundary collaboration.
- Clear infrastructure delivery and funding arrangements.

Continued engagement with neighbouring transport authorities and infrastructure providers.

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

Growth and Infrastructure Response

The Plan should ensure that social infrastructure provision is factored in to all development where mitigation is necessary and should be:

- **Appropriate in scale**
- **Costed and viable**
- **Coordinated and timely**
- **Aligned with development phasing**
- **Supported by cross-boundary collaboration**

Infrastructures should be delivered on a decide and provide basis, not reactive to housing growth only. Infrastructure should be aligned with sub-regional strategies and emerging Spatial Development Strategies (SDS), ensuring consistency with future strategic growth and transport planning across the wider region.

Transport for Hertfordshire Overall Position Statement and Suggestions

Transport for Hertfordshire welcomes the opportunity to engage in the preparation of the new Luton Local Plan and looks forward to continued collaboration as the Plan progresses.

The Local Plan should ensure that transport considerations are embedded throughout the strategy and policy framework, recognising the important role transport plays in supporting economic growth, housing delivery, public health, environmental improvement and placemaking objectives.

Particular consideration should be given to cross-boundary travel patterns, the cumulative impacts of growth on neighbouring transport networks and the need for coordinated infrastructure planning and delivery.

The Plan should support increased use of walking, wheeling, cycling and public transport, whilst ensuring that development is aligned with infrastructure provision and delivered in a manner that supports sustainable and well-connected communities.

HCC welcomes being engaged at this early stage of Plan Making and wishes to continue to be engaged at every stage, both formal and informal to ensure that all necessary stakeholders are engaged in strategic scale and cross-boundary infrastructure discussions to ensure that the best possible outcomes are delivered for residents.

Thank you for including HCC in this Local Plan consultation. Please do continue to engage HCC in the Luton Local Plan process and any other updates associated with its creation.

Kind regards,



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