

24361/A3/MJ/RM

26 August 2016

**EXAMINATION OF LUTON LOCAL PLAN  
INSPECTOR'S MATTERS AND QUESTIONS (STAGE 2 HEARINGS)  
RESPONSE OF BEHALF OF CAPITAL AND REGIONAL, THE MALL, LUTON**

**MATTER 4 - SPATIAL DEVELOPMENT STRATEGY, VISION AND STRATEGIC OBJECTIVES  
(POLICY LP 2 AND SECTIONS 2, 3 AND 4)**

**Main issue: Does the plan clearly and correctly define the sub-regional role of Luton in terms of housing, employment and retail/town centre uses up to 2031? Is the overall balance proposed between providing for housing, employment and retail/town centre uses, within and outside of Luton, justified and appropriate?**

*Questions:*

*9. Is the sub-regional role of Luton in terms of housing, employment and retail/town centre uses justified, including as expressed in sections 2, 3 and 4 of the Plan?*

*10. Has the correct overall balance been struck between providing for economic development, retail and housing needs, having regard to the potential effects on transport infrastructure, commuting and the environmental role of sustainability?*

*11. Is it appropriate to seek to meet all of Luton's economic and retail needs within Luton when a substantial proportion of the housing need would have to be met outside Luton?*

*12. Is the sub-regional role of Luton adequately articulated and explained in the plan?*

*13. Are the vision and strategic objectives of the Plan appropriate?*

*14. Should there be an objective to set out Luton's commitment to meeting housing needs which cannot be provided for within Luton?*

Capital & Regional supports Policy LP2(C), contained in the Pre Submission Local Plan (dated October 2015) which directs Town Centre and Retail uses in accordance with the Centre Hierarchy contained in Policy LP21. This policy is consistent with the National Planning Policy Framework (NPPF) in recognising the importance of the town centre and the need for growth to allow the town centre to remain competitive and to prosper. Policy LP2(C) also reinforces that The Town Centre, District and Neighbourhood network will be the focus for future investment provision, including appropriate scale housing, retail and employment development. Again, this is in accordance with NPPF, and supported by Capital & Regional.

The Council's Retail Study Update (dated July 2015) suggests that the borough needs to continue with investment in order to improve the competitiveness of the Town Centre and increase its relatively low market share for comparison goods, in the face of intensified competition from rival centres. The Northern Gateway and Power Court strategic allocations offer an opportunity to deliver

this step-change to ensure Luton Town Centre is competitive, and combat existing deficiencies and retail trade leakage. Accordingly, Capital & Regional are supportive, in principle, of the proposed strategic allocations for Power Court and the Northern Gateway sites, in order to meet Luton's retail needs. It is also understood that the quantum and distribution of retail floorspace will now be considered in Stage 3, as such, Capital & Regional will provide detailed comments on these topics at that time.

At the Stage 1 hearing sessions, the Inspector and participants were informed that the Council was simultaneously supporting the Pre-Submission Local Plan and reserving its position regarding a potential alternative spatial strategy. This is clearly a very unusual situation, and as such Capital & Regional reserves its position regarding any alternative strategy which might be advanced during the Examination. This applies in relation to Matter 4 and all other Inspector's Matters.

**MATTER 15 SELECTION OF SITES ALLOCATED FOR DEVELOPMENT  
– METHODOLOGY AND PROCESS**

**Main issue: Has the site selection process for strategic sites, housing and employment allocations been based on a sound process and methodology?**

*Questions:*

*145. Has the site selection process for strategic sites, housing and employment allocations been based on a sound process of sustainability appraisal and the testing of reasonable alternatives?*

*146. Is the methodology appropriate?*

*147. Was an appropriate selection of potential sites assessed?*

*148. Are the reasons for selecting the preferred sites and rejecting the others clear?*

*149. What were the key factors in the site selection process for the strategic sites, housing and employment allocations?*

Capital & Regional has no comments regarding this Matter in relation to the Pre Submission Local Plan (dated October 2015). However, in the context of the potential alternative spatial strategy, which the Council's has indicated it may wish to switch to, Capital & Regional reserve their position to comment on Matter 15, should the methodology and process be amended and additional/alternative site allocations be proposed for incorporation into the plan. This applies in relation to Matter 15 and all other Inspector's Matters.