

Planning and Transportation

LUTON LOCAL PLAN (2011-31)

Centres

April 2016

1. INTRODUCTION

Purpose of a Background Paper:

- 1.1. Background Papers are an important source of information helping to outline and explain how policies in the Submission version of the Luton Local Plan (2011-2031) have been prepared.
- 1.2. Preparation of the plan has taken place over several years. One of the main roles of a background paper is to set out the approach taken to developing policies and the response to various overlapping factors that have been relevant to the process, such as:
 - Recognising that evidence prepared at different times or focusing on different objectives, issues and specialist areas should be considered 'in the round'. Studies are often prepared concurrently, but at other times further consideration helps to explain the interaction between different findings.
 - Government policy including that set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) which might have changed whilst the plan was being prepared. Recent changes to rights for Permitted Development (such as 'office-to-residential') are one such example.
 - Changes in the local and national economy influencing potential demand for different development types, such as changes in house prices or designation of the Luton Airport Enterprise Zone.
 - Looking across all the evidence and consultation responses to inform overall views on:
 - The most appropriate balance between policy topics and of land uses for the plan;
 - Where relevant, the most appropriate targets for specific development types or outcomes; and
 - The most appropriate sites and strategic locations to meet different requirements.
 - Specific national policy requirements such as the preparation of a Strategic Housing Market Assessment and an objective assessment of housing and employment needs which does not have regard to potential constraints such as a lack of sites or the presence of Green Belt designations;
 - Taking account of how evidence and emerging proposals relate to plan-making activities in nearby authorities as part of the Duty to Co-operate. This helps to understand the

relationship between different land uses and the ability to provide for different needs such as employment, retail and housing.

- Taking account of more recent evidence since relevant studies were first completed or alternate sources of evidence that might suggest different answers or preferable options
 - The relationship with infrastructure provision, including the existing position, programme for future work and sources of available and required funding.
- 1.3. When tackling these factors ‘in the round’ it is not always appropriate or possible to translate recommendations from one particular study or Local Plan stakeholder directly into policy.
- 1.4. The Council has prepared a series of Background Papers. The Overall Approach Background Paper sets out the context to the plan’s preparation as a whole. This is then supplemented by a series of topic based Background Papers and a separate Duty to Co-operate Statement. The aim of each Background Paper is to demonstrate the ‘direction of travel’ for each topic and how this provides the most appropriate strategy for the future development and growth of Luton. The intention is to signpost rather than to duplicate the detailed technical evidence which is already available in the evidence base.
- 1.5. The Background Papers have a common structure identifying (Section 2) the topic(s) covered, (Section 3) the main issues addressed in the main body of the report, (Section 4) a listing of that part of the evidence base especially relevant the topic(s) (Section 5) the main body of the report addressing the issues, and (Section 6) concluding remarks.

2. THE TOPIC FOR THIS BACKGROUND PAPER – LUTON’S HIERARCHY OF CENTRES

- 2.1. The Local Plan is important for many reasons although the following five points are particularly noteworthy in relation to aspects of centres and provision for town centre uses:
- i. A well-functioning town centre and an appropriate and effective network of District and Neighbourhood Centres can make an important contribution to sustainable development as a whole in terms of managing patterns of land use, directing investment, improving the built and natural environment and maximising the use of pedestrian links and public transport connections.
 - ii. Significant levels of growth in population, housing and employment are planned for in Luton Borough and its surrounding areas. It is important that the Local Plan is based on a clear understanding of the current performance of convenience and comparison retail floorspace and takes forward an aspirational but realistic approach to accommodate increased future demand for such uses.
 - iii. Luton Town Centre in-particular provides for a wide range of uses in addition to retail development. Encouraging appropriate levels of diversification through accommodating further mixed-uses represents an important element of improving

the vibrancy of the Town Centre for visitors and those who live and work there, ensuring that the area is used well at all times of day and supports an attractive environment.

- iv. National policy promotes a 'Town Centre First' approach to providing for main town centre uses which is important in the context of Luton and the local importance and interpretation of this is set out through the policies of the Local Plan. This requires a clear understanding of recent patterns of expenditure, change in floorspace and competition from other centres and out-of-centre locations already in the planning pipeline within the Retail Study catchment.
- v. Appropriate flexibility and contingency is needed within the policies for the Town Centre and network of District and Neighbourhood Centres in order to recognise the opportunities to establish new centres as part of planned strategic growth in order that these locations can better meet day-to-day needs such as at Napier Park and to support regeneration. It is also important to acknowledge the local context and Luton's main assets to provide a flexible approach to certain uses, in-particular the relationship between hotel accommodation and London Luton Airport.

2.2. In summary, there are significant benefits to plan-making locally resulting from a clear evidence base for main town centre uses, helping to promote a successful Town Centre and network of District and Neighbourhood Centres in accordance with national guidance. This has an important role in supporting the objectives of the plan as a whole and in-turn the delivery of a number of strategically important sites.

2.3. There have been a number of views expressed on the designation and status of centres included in the representations received as part of consultation on the Pre-Submission Luton Local Plan 2011-2031. Many highlighted aspects of the Plan's approach to identifying and providing for town centre needs. Some of the representations endorsed the approach some but not all aspects of the supporting evidence base for the Local Plan. Others identified specific soundness concerns or site-specific issues. Amongst the key areas identified include:

- Whether the assessment of needs for convenience and comparison retail floorspace accurately takes account of the latest findings from the 2015 SHMA
- The basis for the Retail Study Catchment identified
- Whether the overall level and locations of growth identified and the policies of the plan as a whole will encourage use of sustainable transport and support and effective network of centres.
- Whether greater flexibility is needed to accommodate non-retail uses in the Town Centre, in terms of supporting uses such as a Food Court in 'The Mall'
- The promotion of large scale out-of-centre retail development and whether this is consistent with the local approach to 'Town Centre First' principles
- Whether other uses, including a new Luton Town Football Club stadium in the town centre at Power Court, would accord with the Plan and represent appropriate uses for key strategic sites

2.4. A number of these issues are explored in other Background Papers and the Duty to Co-operate Paper. This Background Paper clarifies the 'Town Centre First' approach taken and

addresses the reasons for the level, locations and provision for town centre uses identified and the justification for this.

3. THE MAIN ISSUES FOR THIS BACKGROUND PAPER

3.1. The following key questions are addressed in the Section 5 of this Background Paper:

- Issues affecting the approach in the Luton Local Plan 2011-2031:
 - The correct approach to identifying and assessing an appropriate network of centres and the need for additional town centre uses (including retail floorspace)
 - The relationship of the policies for town centres and town centre uses with sustainable development and the objectives of the Luton Local Plan
 - Luton's hierarchy of centres
 - Opportunities to identify and deliver other Neighbourhood and District Centres
 - Justification for the Local Plan Proposals to accommodate the growth in retail expenditure, including details of the scale and distribution of retail proposals in the plan.
 - The prospects for growth and the approach towards other town centre uses including hotels and leisure.

4. KEY EVIDENCE STUDIES INFORMING THIS BACKGROUND PAPER

4.1. There is a comprehensive evidence base that sits behind the Local Plan. All the documents are listed and are available from the Council's website at the following url:

<http://www.luton.gov.uk/Environment/Planning/Regional%20and%20local%20planning/evidence-base/Pages/default.aspx>

4.2. The structure of the documentation is listed as follows, starting with the documentation that forms the Submission version of the Luton Local Plan (2011 to 2031). Only specific documents that are referred to in this Background Paper are referenced in full.

The Luton Local Plan (2011 - 2031) [SUB]:

SUB 001 - Luton Local Plan (2011 - 2031) - Pre submission version - October 2015 - Luton Borough Council

SUB 001A – Luton Local Plan (2011 - 2031) – Schedule of Minor Modifications to the Pre submission version – April 2016 - Luton Borough Council

SUB 002A - Luton Local Plan (2011 - 2031) - Submission version policies map – April 2016

SUB 003A - Luton Local Plan (2011 - 2031) - Pre submission version town centre inset – April 2016

SUB 004A - Sustainability appraisal of the Luton Local Plan - Sustainability report on the submission Local Plan - March 2016 - Urban Edge

SUB 008 – Luton Local Plan (2011 - 2031) – Pre Submission Version Consultation Response – Summary – April 2016 – Luton Borough Council

Vision, objectives and spatial strategy [STR]

STR 008 - Corporate Plan 2014-2017 - Luton Borough Council

STR 016 - Luton High Town supplementary planning document - 2007 - Luton Borough Council

STR 017 - High Town east village design codes - 2009 - Luton Borough Council

STRAT 018 High Town Masterplan, 2016, BDP for Luton Borough Council

Housing [HOU]

HOU 003d - Housing Market Areas in Bedfordshire and surrounding areas

Luton town centre and neighbourhood centres (CEN)

CEN 002 - Luton town centre development framework - December 2004 - Luton Borough Council

CEN 003 - Luton town centre surveys – 2012 - BMG

CEN 004 - Review of town centre office business re-use study - May 2013 - Peter Brett Associates

CEN 005 - Luton retail study update - July 2015 - White Young Green

CEN 005a - Luton retail study executive summary update – 2015 - White Young Green

CEN 006 - Leisure study - July 2015 - White Young Green

CEN 006a - Leisure study executive study - July 2015 - White Young Green

CEN 007 - Luton hotel study - July 2015 - White Young Green

Infrastructure delivery and monitoring the local plan [DEL]

DEL 005 – Luton’s Investment Framework – April 2016 – Luton Borough Council

- 4.3. This Background Paper also makes reference to the Luton Borough Council Retail Study Refresh (December 2012) prepared by White Young Green. In terms of the quantitative assessment of needs, this document is superseded by the latest Retail Study Update (CEN005). The recommendations of the 2012 Study are carried forward and updated in the 2015 version. However, in qualitative terms the 2012 Study provides the original assessment for various locations (especially the network of District and Neighbourhood Centres) and therefore it is referred to as part of the wider context for the Local Plan’s approach.

5. MAIN BODY

i. The Correct Approach to Identifying a Hierarchy of Centres

- 5.1. The Luton Local Plan 2011-2031 adopts a comprehensive approach towards planning for the most appropriate types of development to be guided to the most appropriate locations in order to deliver sustainable patterns of development, where people can both live and work, and access local shops and services through walking and cycling or through making linked trips, particularly if its necessary to use the car or public transport. This is important in the

context of a tightly bounded, high density urban area where people, jobs and services can be collocated and maximise accessibility via public transport. The role and character of existing types of places, can establish such a broad framework of functional centres which can be further shaped and developed by planning policies to manage their delivery over time.

- 5.2. This approach also needs to take account of the town's relationship with the wider conurbation including Dunstable and Houghton Regis; links across the Functional Housing Market Area; and its role as part of a wider sub-region comprising a variety of competing and interrelated major settlements.
- 5.3. The National Planning Policy Framework at Paragraph 23 sets out the main considerations for ensuring the vitality of town centres. However, these cannot be divorced from the wider objectives of the planning system. For example, the core planning principles at NPPF Paragraph 17 variously recognise the objectives of promoting mixed-use development; encourage the use of previously developed land; make the fullest possible use of locations that are or can be made sustainable; and support local strategies to improve health, social and cultural well-being including delivering services to meet these needs.
- 5.4. Providing planning policies to cover an appropriate network of centres is an important aspect of achieving these objectives. Section 8 of the NPPF also highlights important considerations in planning for healthy communities, including ensuring that planning policies fully encourage opportunities for meetings between members of the community; in safe and accessible environments; and promoting high quality public space and continual use of public areas (Paragraph 69). Policies should support and enhance sustainable communities, for example by guarding against the unnecessary loss of valued services and facilities; enabling shops and other facilities to develop and modernise; and planning positively for the provision of shared space (e.g. through shops and community facilities) (Paragraph 70).
- 5.5. National Planning Practice Guidance expands upon these principles and provides further clarification. It recognises that "a positive vision or strategy for town centres, articulated through the Local Plan, is key to ensuring successful town centres which enable sustainable economic growth and provide a wide range of social and environmental benefits" and that the Local Plan should provide the starting point for these decisions (NPPG ID: 2b-002-20140306). Important practical considerations include the ability for town centres to meet the full needs for town centre uses under a 'town centre first' approach include ensuring that centres identify adequate capacity to meet the assessed need and over what timeframe these needs should be delivered (NPPG ID: ID: 2b-003-20140306). This includes recognising where the role of different centres in the hierarchy may change over the plan period and where other opportunities may help to deliver needs for town centre uses – for example in edge-of-centre locations, redeveloping existing sites or at edge-of-centre locations.
- 5.6. The Luton Local Plan acknowledges these much broader aspects by identifying the links between the approach to Luton Town Centre and a network of Neighbourhood and District Centres with a number of relevant Strategic Objectives for the Plan. This provides a broad basis for the local policy approach to deliver some of the specific requirements of national

policy as set out at Paragraph 7.5 of the Submission Local Plan (e.g. defining a hierarchy of town centres and the extent of shopping areas).

Evidence to Inform the Hierarchy of Centres

- 5.7. The evidence base for the Local Plan supports the identification of an appropriate consolidated hierarchy of District, Neighbourhood and Local Centres. This represents an important advance from the approach in the Local Plan 2001-2011 providing for a less well-defined range of locations as Local Centres which provided vital community services.
- 5.8. The Luton Retail Study Update 2015 (CEN005) describes how it takes forward findings from the previous 2012 Retail Study Refresh, in providing a review of existing lower order centres to identify the most appropriate role for different locations within an overall hierarchy.
- 5.9. The 2012 Study was based on comprehensive research and analysis to determine the role and function as well as health of Luton's various centres. This included undertaking specific research on Luton Town Centre, with findings presented as part of the Town Centre Vitality Study Summit (December 2012) (CEN003). The study revealed intelligence on the varied, multi-functional role of the Town Centre through a series of face-to-face and telephone surveys. Whilst around 70% of visitors' reasons for visiting the Town Centre included shopping, 'Leisure' categories were also well-represented (37%) and around a quarter of all people interviewed were in the Town Centre for reasons of work. Luton Town Centre provides the main retail offer in the town and visitors viewed these facilities favourably or equivalent to many other centres e.g. Bedford, Stevenage and Welwyn Garden City. When asked regarding other Main Places where 'non-visitors' might usually go for shopping rather than Luton, only Milton Keynes was chosen by more than 5% of respondents (32%).
- 5.10. Luton's performance is weaker relative to other centres which are either of a comparable (or larger) size such as Milton Keynes and Watford and St Albans in-particular which may respectively, be seen as offering a more accessible location or providing a more attractive retail environment. Although the reasons Luton performs differently may be varied, given Luton's population and strong transport connections, there is a clear case to secure, promote and enhance the town's role relative to these locations.
- 5.11. The Town Centre's role in providing leisure facilities produced a similar pattern of results, demonstrating that Luton also has an important role for these functions. A lower proportion (18%) of 'non-visitors' identified Milton Keynes as a preferred location for leisure, but no other centre scored over 8%. Respondents identified variety of shops (8%) and family attractions (5%) as reasons for choosing other centres and only just over half of non-visitors described the Town Centre as 'Fairly Lively' or 'Very Lively'. Whilst this does not detract from Luton's role, it indicates the importance of measures to promote a vibrant, mixed-use Town Centre economy, accommodating a variety of uses through the day.
- 5.12. In relation to the Luton's network of other centres, paragraph 4.5.1 of the 2012 Retail Study succinctly highlights that:

“Luton town centre cannot solely cater for all of the retail/ service and community needs of the Borough population. It is important the Borough has a hierarchy of centres that are able to adequately service the day to day retail and community needs of the local population as near to their homes as possible. This is particularly important for less mobile/ more vulnerable members of the community. This approach can help to ensure that centres are lively, thriving and safe places to visit while reducing unsustainable travel patterns; thereby reducing congestion within the town. This principle works for retail needs and also other service and community facility needs e.g. surgeries and libraries etc. To adequately supplement the town centre, the Borough needs a network of District and Neighbourhood centres.”

- 5.13. Luton Borough Council has historically produced its own survey information to inform evidence of performance and vacancy levels in the various centres. The Retail Study evidence base complements this with a detailed health check assessment for each centre. This represents an objective process in accordance with national guidance (see NPPG ID: ID: 2b-005-20140306) with the assessments identifying factors including the mix of uses; pedestrian flows and accessibility levels; perceptions of safety e.g. natural surveillance; the quality of the overall environment and levels of vacancy. First produced in the 2012 Study, these assessments were reviewed in the Retail Study Update - Refresh (2015 – CEN0003) giving an up-to-date basis for understanding. The evidence-base also contains maps to visually represent the layout and mix of uses in the various centres surveyed.
- 5.14. Outputs from the assessments are considered against the key criteria helping to define the nature of ‘District’ and ‘Neighbourhood’ Centres as evaluated by the Retail Study evidence base. This recognises that:
- 5.15. **District Centres:** Are designed to act as the primary focus for shopping and other service delivery within a particular part of the town. Such centres can cover typical weekly retail, service and community requirements. Due to their ability to provide a range of shopping, such centres can act as a natural focus for investment and ensure that one journey can satisfy most needs of the local population. A small-to-medium supermarket typically acts as an anchor, alongside dedicated parking, a range of community or potentially health facilities and the possibility of a transport hub, depending on location. Seeking to further focus investment and services at these locations (in terms of the Council and transport operators) should ensure that they cater for a considerable proportion of local journeys.
- 5.16. **Neighbourhood Centres:** Provide a more limited retail offer which means a lesser role and function to District Centres. Neighbourhood Centres are primarily intended to service the needs of the population within walking distance and may not therefore provide the same levels of dedicated parking, public transport accessibility or opportunities to capture passing trade. However, they will typically demonstrate a parade of shops in one or more continuous rows, with often independent outlets with a largely retail or service sector base. There may

often be other public services clustered in close proximity such as schools and health facilities, providing a good basis to meet day-to-day needs.

- 5.17. The Retail Study evidence base looks to assess whether a number of existing centres are able to fulfil the role and function of District or Neighbourhood Centres. The process should also be regarded as iterative in the context of preparing the Submission Local Plan and also as part of completing and updating the evidence base. For example, the assessment for each centre is prepared and guided by local circumstances reflecting the role, function, land use character and accessibility of any given centre.
- 5.18. The Retail Study also provides a link to the Objectives and policies of the Local Plan as a whole. This is particularly important in terms of recognising where investment or non-land use related intervention is already identified (e.g. regeneration or public realm improvements) or where the role and function of a centre might interrelate with the strategic proposals in the Local Plan.
- 5.19. Where locations do not fulfil these criteria, the Retail Study recognises that they will continue to fulfil lower order roles as ‘Local Centres’ in accordance with the Luton Local Plan 2001-2011. The policy approach in the Submission Local Plan provides for these local centres outside of the defined centres hierarchy through Policy LP23 - as part of ‘District and Neighbourhood Areas and Shopping Parades’. These parades are identified on the Local Plan proposals map.
- 5.20. This separate policy coverage recognises that these centres do not (or are unlikely to) comprise main foci for investment or to secure equivalent wider benefits as a result of promoting a mix of town-centre uses and functions e.g. in terms of optimising the number of journeys. However, Part B of Policy LP23 provides broad support for retaining or providing new convenience retail facilities or increasing the mix of non-A1 uses provided 75% of the shopping frontage remains in A1 Use and the proposal maintains an equally active frontage. This policy also recognises that service provision may be appropriate in these locations, subject to the demands of traffic generation.

Local Plan Settlement Hierarchy

- 5.21. In addition to Luton Town Centre, the Submission Local Plan identifies 6 District Centres and 12 to 13 Neighbourhood Centres (see Policy LP2 Part C). For clarity, these are named as follows (with locations shown on the Submission Policies Map):

Table 1:Luton’s Hierarchy of District and Neighbourhood Centres

| District Centres | Neighbourhood Centres |
|-------------------------|------------------------------|
| Bury Park | Farley |
| Marsh Road | High Town |
| Marsh Farm* | Round Green |
| Wigmore | Lewsey (St Dominic’s Square) |
| Stopsley | Bushmead |

| | |
|--|---|
| Sundon Park | Bramingham (Freeman Avenue) |
| | Hockwell Ring |
| | Biscot Road |
| | Calverton Road |
| | Birdsfoot Lane South |
| | New Neighbourhood Centre at Chaul End Lane or Dallow (Potential Site) |
| | New Neighbourhood Centre at Napier Park** |
| <p>* Marsh Farm is designated a District Centre but may default to a Neighbourhood Centre because the scale and format of retail provision is a matter for the Master Plan for regenerating the area and this will be kept under review. On this basis Sundon Park was accepted as a District Centre following regulation 18 stage.</p> <p>** Napier Park may become a District Centre subject to the scale and format of retail provision in any revised planning permission.</p> | |

- 5.22. The hierarchy provides an appropriate response across the wider administrative area of the Borough in terms of reflecting existing conditions and opportunities to focus investment and maximise prospects for complementary mixed-uses.
- 5.23. As discussed in the previous section, the hierarchy is responsive to the evidence base, objectives and policies for the Local Plan as a whole. For example, the Retail Study (2012 and 2015 Update) both identify that it would be more appropriate in assessment terms to reclassify High Town as a Neighbourhood Centre, compared to its previous identification as a District Centre in the Local Plan 2001-2011. This reflects features such as its lack of a convenience supermarket as a retail anchor store and higher levels of vacancy. The location as a whole provides a lower proportion of convenience facilities. The location may also be less attractive to passing trade and in pedestrian accessibility terms may be bypassed by users on route to the Town Centre; also taking account of the large number of premises which do not open during daytime hours thus affecting vitality.
- 5.24. It is appropriate that the hierarchy reflects the designation of a Neighbourhood Centre on this basis. However, the policy response for High Town (Policy LP10) takes forward this evidence in a holistic manner, including in association with the opportunities for regeneration through the High Town Masterplan (see STR016, STR017 and STR018). This allows a focus on matters such as design, safety and the built environment (Policy LP10 Part D) which as a whole look to secure and enhance the role and function of High Town as a centre as well as maximising the effectiveness of links with the Town Centre to the south.
- 5.25. The proposed District Centres at Marsh Farm and Sundon Park also represent a flexible policy response taking account of the findings of the evidence base. In the case of Sundon Park, extant permission for an anchor foodstore supports its identification as a District Centre as part of this anticipated delivery and in association with strong provision of community services and facilities.
- 5.26. The identification of Marsh Farm as a District Centre reflects the prospect of a significant increase in the service offer and in-particular retail facilities in association with the regeneration and redevelopment of the area. This is also anticipated in association with residential development (typically replacement and renewal) and improvements to accessibility and the public realm. The existing centre already contains a strong profile of

community services and facilities. However, Marsh Farm may default to a Neighbourhood Centre because the scale and format of retail provision is a matter for the Master Plan for regenerating the area and the commercial opportunities that prevail with its regeneration and this will be kept under review.

- 5.27. The scale of support for these objectives is set out in Policy LP12 of the Submission Local Plan, specifically the opportunity to accommodate an anchor foodstore (up to 1000sqm) at Marsh Farm. The Retail Study recognises this as a long-term aspiration although it remains appropriate that implementation of the policy is subject to monitoring and review. In-particular, there is the possibility that an extant and an emerging consent at the location will be reconfigured to provide a smaller or more sub-divided form of retail development which is less consistent with the traditional District Centre anchor foodstore. Nevertheless, within the context of the Local Plan as a whole, identification as a District Centre remains appropriate to focus investment and recognise the associated benefits towards tackling deprivation and opportunities to improve accessibility to linked facilities through regeneration.

Opportunities to Deliver an Appropriate Mix of Uses and New Facilities through the Hierarchy

- 5.28. The Council is confident that within the hierarchy of centres identified, the policy approach in the Submission Local Plan will positively support their existing role and function and help to direct investment and secure commensurate enhancement over the plan period.
- 5.29. Policy LP21 looks to ensure that retail and other town centre uses are directed to the most appropriate locations in the hierarchy, with a preference for the 'town centre first' approach in the first instance. However, the hierarchy also provides a guide to the operation of the sequential and impact tests and will look to ensure that any proposals do not individually or cumulatively compromise the vitality of individual District and Neighbourhood Centres.
- 5.30. Policy LP23 provides a general approach to maintaining an appropriate mix of uses (in-particular A1 retail facilities) and promoting the continued viability and vitality of town centre locations, which applies specifically to District and Neighbourhood Centres.
- 5.31. The assessments in the Retail Study identify vacancy levels and in some cases prospects for redevelopment and re-use. In the case of the Neighbourhood Centre at Birdsfoot Lane (South) its designation is supported by the availability of identified land in Luton Borough Council ownership to potentially deliver additional convenience floorspace to support this role. This reflects that District and Neighbourhood Centres comprise more suitable locations for accommodating part of the need for convenience and comparison floorspace in terms of the requirements of the sequential test.
- 5.32. The Council considers that the high density of population and land uses across the Borough supports the demand for retail premises and collocated community services and facilities.

The strategic approach of the plan as a whole and the policies for specific allocations will encourage further increase in overall density and a careful balance of land uses. For this reason, the hierarchy of centres recognises the potential to deliver additional Neighbourhood Centres over the plan period.

- 5.33. In particular at Napier Park (Policy LP 8), the Retail Study Update – Refresh (2015, CEN005) recognises the change in circumstances following consent being issued for the location which incorporates an element of retail floorspace. The Retail Study draws attention to considering the impact of this commitment in sequential terms and potential impact on demand from other town centre locations. However, the Council’s approach to preparing the policy recognises the significant opportunity for mixed-use residential development at the site and considers that the inclusion of a carefully considered degree of retail floorspace offers the opportunity to complement the allocation and approach in the strategy as a whole. The allocation also has strong links to London Luton Airport and the benefit of connections associated with the Luton – Dunstable Guided Busway.
- 5.34. In response to representations on the Pre-Submission Luton Local Plan Consultation (October 2015), the Council has proposed a Minor Modification to Policy LP21 to acknowledge the creation of a new Neighbourhood Centre at Napier Park. It is highlighted that Policy LP8 is not drafted in a prescriptive manner to directly reflect any existing consent for the land and that as a result there is some flexibility and uncertainty in the nature of any retail and associated development that may come forward within a final scheme and it is further not possible to spatially define the final extent of the area itself. However, it is accepted that it would be appropriate for Policy LP21 to reflect that the benefits of a neighbourhood centre at Napier Park are acknowledged and would be considered to support delivery of this mixed-use area in the future.
- 5.35. The Council also considers that the points above also justify the identification and support for the creation of a new Neighbourhood Centre in an ‘area of search’ at Chaul End Lane or Dallow Road as set out in the Local Plan at Policy LP21. Luton as a whole is served by a broad range of centres providing good coverage across the town. However, the Retail Study Refresh (2012) and Update (2015, CEN005) both emphasise the more disparate pattern of provision on the west of the town particularly around Dallow Road. The 2012 Study notes that:

“Dallow Road is the focus for some retail/service and community activities within the borough. There are three small allocated local centres along Dallow Road: at the junction of Lyndhurst Road; Shirley Road; and Warren Road. Collectively these serve this area with a very limited and sporadic choice of shops and services including newsagents, grocers, chemist and cafés etc. In addition, numerous community facilities are located along Dallow Road including Dallow Road Primary School, the Dallow Development Trust Community Centre, Foxdell Infant School and Children’s Centre, Foxdell Junior School and St Peter’s Church. Albeit these are disparate and considered likely to generate unnecessary travel

patterns. These facilities are somewhat disparate and poorly linked for journeys on foot.”

- 5.36. The gaps in provision are acknowledged and it is recommended to consolidate many of these functions and enhance provision by encouraging the development of a distinct Neighbourhood Centre. However, these studies acknowledge that there are not currently any identified, available sites that could immediately fulfil this objective, noting the high degree of employment and residential functions fronting Dallow Road.
- 5.37. The Council is, however, confident that these development outcomes can be secured over the plan period and commits to supporting them through the plan. The area along Chaul End Lane is also identified as relevant to the ‘area of search’ due to its relative proximity and similar pattern of land use (see, for example SHLAA Site ID 159). This ‘area of search’ also gives some flexibility and contingency to the Plan as a whole, in terms of potential additional opportunities to deliver town centre uses over the plan period.
- 5.38. Evidence from redevelopment opportunities such as Napier Park indicates that landowners and developers are likely to support and encourage the provision of mixed-uses, whilst public sector landowners may also be able to contribute to comprehensive proposals.
- 5.39. The need for this collaborative approach fits with monitoring and review and flexibility with implementation of the Local Plan as part of the ongoing identification and assessment of potential sites to carefully manage changes in the overall mix of land uses.

ii. The Local Plan’s Approach to Identifying the Need for Comparison and Convenience Floorspace

Context for Identifying Retail Floorspace Needs

- 5.40. The Luton Study Retail Study Update – Refresh 2015 (CEN005) provides the most up-to-date assessment of the needs for convenience and comparison retail floorspace to inform the policies of the Submission Local Plan.
- 5.41. National Planning Practice Guidance highlights that such assessments must be undertaken in broadly the same way as assessing the needs for housing and economic development. Such an approach also requires local authorities to be mindful of the different rates of development expected to take place in town centres compared with out-of-centre locations (NPPG ID: ID: 2b-001-20140306).
- 5.42. The evidence base for the Luton Local Plan is prepared on this basis. Significantly, the Council also considers it critical that the Retail Study, and its subsequent translation into policy, fully respects the relationship with the strategic priorities for the plan as a whole and the importance of specific strategic locations and allocations to the plan as a whole. This accords with Paragraph 156 of the NPPF, and also specifically Paragraph 179 of the NPPF

requiring recognition of where these issues and priorities may cross local authority boundaries. Key aspects in terms of the assessment of retail floorspace needs can be summarised as follows.

- 5.43. The main way in which the Retail Study evidence base reflects the plan-making context as a whole is through the use of a methodology based on 'Postcode Sector' Zones for the study area. The study area extends beyond the Luton administrative boundary to represent a realistic catchment that incorporates the conurbation with Dunstable and Houghton Regis and also a wider hinterland, incorporating rural areas and the nearby centres of Harpenden and Hitchin. A plan of the six separate zones (with the main Luton area split into sub-areas 1A-1C) identified is shown below:



Fig.1 – Luton Retail Study – Study Area (from CEN005)

- 5.44. The identification of these zones provides an appropriate basis to understand the breakdown of population within a realistic catchment and then undertake original market

research to verify these findings. These Postcode Sector Zones are a refinement from previous South Bedfordshire and Luton studies undertaken in 2005 and 2009 and have been reduced to reflect the more localised nature of the study. However, it is considered important to identify the Study Area as shown above, particularly to identify key linkages and the very strong functional, land use and development relationship with the conurbation including Dunstable and Houghton Regis.

- 5.45. The postcode sector based zones were first updated for the original 2010 Retail Study and have been carried forward since this point. Zone 1 was broken down in A-C purely as it encompasses central Luton which is the most densely populated area. It allowed a slightly finer grained analysis of this resident population's shopping patterns.
- 5.46. The study area catchment extends beyond LBC authority area because, as a regional centre, Luton based stores serve large parts of neighbouring authorities' resident population. The catchment is considered to be an area in which Luton town centre can (and should) realistically serve as resident's primary shopping destination, irrespective of whether they live in Luton authority area or the wider catchment area.
- 5.47. Zone 1 in-particular is complicated by the fact that it includes the entirety of the population within the Luton administrative area and small parts of the population in neighbouring areas – almost exclusively Central Bedfordshire.
- 5.48. As detailed in the Retail Study Refresh – Update (2015) (see Paragraphs 4.2.1 to 4.2.4 of CEN005) this does not present any issue in terms of the robustness or starting point of the basic inputs to assess future changes in demand. The Retail Study was informed by the latest projections based on the objectively assessed need for Luton and Central Bedfordshire from the Luton and Central Bedfordshire Strategic Housing Market Update. The population data have subsequently been disaggregated into the Retail Study Area Sector Zones. This means that the Retail Study accurately captures the levels of growth anticipated in Luton and its neighbouring areas.
- 5.49. The consultants preparing the SHMA are adept at disaggregating and apportioning various projections into different geographies. This is evidenced by Document HOU003d setting out the definition of Housing Market Areas in Bedfordshire and surrounds and Figure 39 for example for sharing the Luton catchment population across different Local Authority areas, which is produced by aggregating the population within different geographies and small areas.
- 5.50. The Retail Study attributes the full objectively assessed need projection for Luton to the parts of the Study Area covering the administrative area. Whilst the Local Plan is clear that all of Luton's housing need cannot be fully met within the administrative area, it is nevertheless practical and in accordance with national guidance to consider that this need should be met as close as possible to where it arises; therefore in practice it is likely to fall within the Study Area. In addition, it is appropriate that the Retail Study plans positively to assess the full need for comparison and convenience floorspace likely to arise.

5.51. The Study Area identified also enables other commitments and emerging allocations which may potentially deliver commercial (in-particular retail) floorspace to be identified and considered in the context of their effect on future needs and the pattern of delivery that may contribute to meeting these. Although no significant retail developments are likely to occur in North Hertfordshire or St Albans City and District to influence the assessment of needs, this is not the case for Central Bedfordshire. The significant planning commitment at the North of Houghton Regis Urban Extension is specifically at Paragraph 5.3.3 of the Retail Study Update – Refresh (2015). This has a significant impact on future capacity, although it is noted that there is currently limited detail on the commercial elements of the scheme; and that their delivery is not anticipated until 2022 or later. Nonetheless, this is material to the study and emphasises the sub-regional, or ‘conurbation-wide’ basis which the Luton Local Plan must take into account.

Luton’s Identified Retail Floorspace Needs

5.52. The identified needs for comparison and convenience floorspace in Luton over the plan period are set out in full in the supporting text for the Submission Local Plan. However, for clarity they are copied below for information:

Tables 2 and 3: Luton Local Plan Requirements for Additional Comparison and Convenience Floorspace

| Net Additional Convenience Floor Space* | | | | |
|---|-------|-------|-------|-------|
| 2015 | 2020 | 2025 | 2030 | 2031 |
| 3,393 | 6,279 | 5,757 | 8,467 | 9,064 |

| Net Additional Comparison Floor Space* | | | | |
|--|-------|--------|--------|-----------------------|
| 2015 | 2020 | 2025 | 2030 | 2031 |
| N/A | 4,420 | 30,096 | 49,483 | 53,715 ⁽¹⁾ |

1. *Figures represent the estimated requirement for net additional floorspace at a given year based on modelling of increased population and expenditure from a benchmark position (at 2015) and taking into account delivery of existing commitments

5.53. These requirements are clearly set out in the Retail Study Update – Refresh (2015) (CEN005). The evidence base clearly details that an industry accepted methodology has been followed as part of a step-by-step approach to identify an appropriate level of need. It is important to highlight at the outset that the consultants preparing the Retail Study state the following:

“WYG recommend caution is applied in relying on the longer-term projections of any capacity assessment owing to the volatility of much of the data and assumptions used. Indeed, an updated capacity assessment of need should ideally

be carried out around every 5 years. Accordingly, it is not necessarily appropriate to plan to meet all needs identified now. WYG recommend assessed capacity is kept subject to review.”

- 5.54. This is significant in the context of the footnote to the tables above and the need to keep the evidence provided through the Retail Study and its inputs up-to-date. The Retail Study reiterates that these key inputs include the forecast population growth and also expected growth in expenditure. Also significant is the existing supply of commitments in the pipeline and the ‘benchmark’ turnover of existing [convenience retail] operators compared against current trading patterns. Where trading patterns indicate that turnover is substantially exceeding the estimated benchmark it is likely that existing capacity is stretched relative to quantitative assessment of needs. This Retail Study finds this to be the case within Luton.
- 5.55. The Retail Study also identifies that it is appropriate to consider Luton’s projected expenditure for convenience retail on the basis of an increased market share. This is in order to take account of the impact of demand from factors including overall improvements in the town centre retail offer and general environment. This ensures that future estimates of capacity reflect key opportunity sites and the likelihood of improvements in the attractiveness and competitiveness of Luton town centre as a convenience retail destination.
- 5.56. In terms of considering the needs of comparison retail floorspace, the Retail Study (CEN005) specifically explores Luton in the context of Paragraph 23 of the NPPF and the need to promote competitive town centres including provision for customer choice and a diverse retail offer; providing a range of allocated sites to meet those needs.
- 5.57. The appropriate response to this through the Retail Study includes consideration of a scenario whereby Luton increases its market share of expenditure relative to other centres. This is considered important in the context of perceived historical imbalance (noted in the 2005 and 2009 retail studies) in terms of growing expenditure available in the retail catchment compared with relative limited growth in Luton’s Town Centre comparison floorspace. This affects the relationship with surrounding centres, but is also relevant in the context of growing competition across the Study Area over the plan period due to the significant committed development at out-of-centre locations – in-particular the urban extension North of Houghton Regis.
- 5.58. This uplift in market share is considered to be aspirational and realistic, reflecting support for the wider role of Luton Town Centre and the anticipated delivery of key opportunity sites alongside revitalisation of the area as a whole (the Northern Gateway and Power Court). This projected increase in market share has a greater effect later in the plan period (when the majority of growth is expected to take place in the wider conurbation) and contrasts with the position in the early periods – where comparison floorspace is considered to trade broadly in equilibrium with available expenditure and any latent demand is likely to be fulfilled by existing commitments.

- 5.59. As stated above this position reinforces the importance of monitoring and review of the Local Plan as a whole but particularly in this case the performance of the retail economy. The implications for this monitoring will need to take account of a number of factors and inevitably address cross-boundary implications under the Duty to Cooperate. Particularly significant are the overall growth of population (and indirectly expenditure) across the Study Area compared with current projections and also whether commitments in the pipeline are delivered as expected.
- 5.60. For example, if commitments at North of Houghton Regis are not delivered as expected, the demand for comparison floorspace in other areas is likely to increase, with the prospect that more expenditure could leave the sub-region. Conversely, the delivery of out-of-centre commitments should be monitored closely. If additional provision outside of the Town Centre comes forward at Houghton Regis North ahead of a significant increase in expenditure this could undermine the attractiveness of the Town Centre and its share of overall spend. This situation could also exacerbate the risk of out-of-centre retail development in other locations, particularly taking account of the current position of floorspace trading broadly at equilibrium and the wider competition from other centres e.g. Milton Keynes.

iii. The Local Plan's Approach to Identifying the Need for Comparison and Convenience Floorspace

Meeting the Need for Convenience and Comparison Floorspace

- 5.61. For reasons already touched upon earlier in the Background Paper in terms of the hierarchy of centres identified in Luton and the approach to assessing convenience floorspace needs, the Luton Local Plan provides a flexible and appropriate response with a range of opportunities to meet demand. As a whole, these will serve to reinforce the network of the Town Centre, District and Neighbourhood Centres as a whole.
- 5.62. Identification of the supply to meet these needs also takes account of the existing pipeline of commitments for convenience retail uses. In particular, this includes the commitment for a retail foodstore to enhance the role of the District Centre at Sundon Park. The committed floorspace at Napier Park – and support to develop a Neighbourhood Centre at the site, also adds to this pipeline.
- 5.63. There is also the prospect of meeting around 1,000sqm of identified needs through the redevelopment of the Marsh Farm Central Area and in the longer term as part of supporting the development of the Birdsfood Lane (South) Neighbourhood Centre where a small allocation of convenience retail is proposed. Further flexibility may be provided through any opportunities to deliver small-scale convenience retail as part of establishing a new Neighbourhood Centre at Chaul End Lane / Dallow Road.

- 5.64. The existing work to develop this pipeline plus the additional opportunities to provide convenience retail floorspace offer robust scope to address the unmet needs for these facilities and achieve a better balance from within currently stretched capacity.
- 5.65. For qualitative reasons, land at Power Court is considered to have strong potential to bring forward additional convenience retail floorspace and meet these needs earlier in the plan period. For this reason, the Local Plan allocates 3,393sqm of convenience retail floorspace at Power Court (under Policy LP9) to meet needs in the period from 2015. This is a key strategic location for the town centre as a whole, but it specifically offers an opportunity to enhance the area's role in meeting the needs for convenient retail. This is compatible with creating a more vibrant urban environment, making maximum use of public transport connections and also takes account of the increased resident population expected to arise following significant new development – including at least 600 dwellings at Power Court itself.
- 5.66. This provides a strong foundation to meet convenience floorspace needs and as a basis for monitoring and review of the evidence base as the plan is implemented.
- 5.67. In terms of the strategy to deliver comparison floorspace, it is imperative to recognise that based upon the findings of the Retail Study this is an approach which is inherently shaped by a focus on the Town Centre. This takes account of Luton's relative performance compared to other nearby centres, relatively weak growth in comparison floorspace and increased competition from across the Study Area. It is useful to repeat Paragraphs 6.4.23 and 6.4.24 of CEN005 in full:

“Any future proposals should be assessed with appropriate consideration to its potential to have a prejudicial impact on the implementation of the Creative Quarter and Power Court. Proposals for main town uses in out of centre locations must demonstrate compliance with the sequential approach and provide a full assessment of impact of the proposal on the vitality and viability of protected centres in the Study Area.

WYG consider any out-of-centre development of a size and scale prejudicial to the delivery of the Northern Gateway and Power Court site and/or the enhancement of retail facilities within the borough's other key centres should be resisted, in accordance with policy set out at paragraphs 26 and 27 of the NPPF.”

- 5.68. The basis for assessing future needs for comparison floorspace, in-particular taking account of an increased market share, is predicated on this approach and enabling the success of the Town Centre and edge-of-centre locations. This complements the wider objectives of the plan and indeed should be taken as an important strategic priority contributing to sustainable development across the sub-region and local conurbation.
- 5.69. The Retail Study Update – Refresh is fully cognisant of the opportunities to deliver comparison floorspace in the Town Centre and remains confident in this recommendation as

the most appropriate strategy. The Submission Local Plan provided a range of opportunities to deliver this development in the context of the existing Town Centre which already provides for a dense and varied mix of land uses.

- 5.70. Key opportunity sites in strategic locations at Power Court and the Northern Gateway are identified as the preferred options within the Retail Study. The Local Plan specifically supports the delivery of comparison retail at these locations. With respect to the Northern Gateway, this site is part of a multi-centred approach to the Creative Quarter (Policy LP11) and represents a specific opportunity to complement and enhance the key retail role at the Mall as well as contribute to comprehensive mixed-use regeneration of the area. Power Court is a sequentially preferable due to its location well-related to the main town centre and public transport routes.
- 5.71. This does not preclude other regeneration sites incorporating retail-led development potentially being identified or put forward within the Town Centre, and this is acknowledged by the Retail Study. Similarly, it will be for the market to decide on the exact form of development taken forward at the specific opportunity sites and potentially suitable sites in the Town Centre more widely.
- 5.72. This repeats the point on the importance of monitoring the Local Plan and reviewing delivery against the assessed requirements, but also in the context of an overall strategy which must look to safeguard, complement and enhance the existing functions of the Town Centre. At the time of preparing the Local Plan, based on this case, it is explicitly not the case that out-of-centre locations for comparison retail floorspace should be identified for comparison retail development because they would not complement or support the strategy in the Local Plan as a whole.
- 5.73. For this reason, the Retail Study recommends and the Submission Local Plan subsequently takes forward a threshold of 1,000sqm for the preparation of an impact assessment for retail, leisure or office development outside of defined town centres. This is in accordance with the basis for setting thresholds set out in the NPPF and reflects the relatively small gross floorspace in Luton's District and Neighbourhood Centres and would ensure most standalone applications for small-medium operators are assessed in terms of their effect on these areas. In addition, this adds emphasis to the need for a sequential test for Town Centre uses, and may assist in directing such proposals to potentially suitable sites within identified centres, including the Town Centre.

iv. The Wider Role of Luton Town Centre and Needs for Other Town Centre Uses

- 5.74. The Council has a strong record in ensuring that Luton Town Centre in-particular provides for an appropriate mix of land uses. For example, The Town Centre Framework (2004) (CEN002) shows the holistic approach taken over a number of years to recognise the varied character and land uses in the Town Centre. This sets out a broader framework of the benefits of mixed-uses on a range of opportunity sites to reflect their relationship with the public realm, accessibility and the natural environment in order to seek comprehensive improvements.

The Submission Local Plan maintains and sets out a strong policy approach to continue to deliver the remaining elements of this Framework, in-particular those which require policies for the allocation or management of land uses.

5.75. More recently, the Retail Study (2015, CEN005) recognises that:

“With the various changes in the retail sector, it is now widely expected that leisure uses will play an increasingly important role in maintaining the vitality and viability of centres and constitute a growing share of town centre floorspace. The reduction in demand for retail floorspace coupled with post-recession increases in discretionary household leisure expenditure is predicted to lead to an increase in supply and demand for leisure activity in town centres.”

- 5.76. This is consistent with national policy as a whole, which recognises the need for a clear economic strategy to positively and proactively manage sustainable economic growth. A diverse role for Luton Town Centre is important to achieve this. This offers opportunities to encourage additional investment and work with other stakeholders beyond key retailers. Associated benefits include increased footfall and use of the town centre during the day. Retail development should not generally be seen as the panacea for a thriving town centre. Indeed, due to the existing combination of land uses in Luton, significant economic development can be accommodated within the same building – for example the upper floors of retail premises whilst maintaining a shop frontage.
- 5.77. The Luton Leisure Study (2015) (CEN006) recognises that in terms of leisure expenditure, food and drink is by far the most popular (57% of total leisure spending). Cultural services and recreation / sport account for 16% and 7% respectively and there is clearly scope for the Town Centre to capitalise on diversification and becoming a leisure destination for these uses.
- 5.78. The Leisure Study considers the qualitative and quantitative need for a wide range of leisure facilities. However, it is acknowledged that the methodology is less well developed and therefore these need estimates are not prescriptive but should be regarded as a qualitative guide which nonetheless, highlights key opportunities e.g. Potentially for up to 17 additional cinema screens and potential demand for an increase in Use Class A3 (Restaurant and Café) floorspace.
- 5.79. The Local Plan therefore, does not specifically allocate development in-line with these recommendations, but alternatively promotes mixed-uses across the strategic locations in the Town Centre as a whole. This is in accordance with the evidence base as a whole, such as the Town Centre Framework. It is particularly relevant for multi-centred sites such as the Creative Quarter, where leisure and recreation facilities cross a range of sites. Recent developments such as the Travel Centre / Starbucks demonstrate an example of environmental and public realm improvements likely to result from this wider approach.

- 5.80. The Submission Local Plan also provides measures to retain appropriate control over the combination of land uses, to ensure that the main roles of the Town Centre (in-particular retail) are protected. This is reflected by the operation of Policy LP22 and its role in defining and protecting Premier, Primary and Secondary retail frontages. It reflects the variety of locations across the Town Centre, including the critical role of The Mall. The policy includes appropriate flexibility for Non-A1 uses where these are compatible with town centre uses and the overall prevalence of these uses in a given location.
- 5.81. Because of this, the Local Plan advocates a flexible response to specific proposals, which in some instances may need to be dealt with at a detailed development management level or through a focused review of parts of the Local Plan. For example, the Local Plan does not specifically support the concentration of 'Food Court' uses in areas such as The Mall due to the high concentration of A3/A4 Uses. However, the Mall has successfully integrated a number of A3 users in this way. Nevertheless, to ensure sufficient regulation of the matter Policy LP22 should be maintained unaltered.
- 5.82. In relation to Hotel Accommodation, the Submission Local Plan is supported by the Luton Hotel Study (July 2015 – CEN007) which in principle identifies the need for extra provision of 1,030 rooms by 2020 growing to 1,830 rooms by 2030. Tourism development including hotel and conference facility uses is recognised as a main town centre use in the NPPF. However, the evidence base and context for the Luton Local Plan as a whole recognises that the policies should reflect a more flexible approach.
- 5.83. This takes account of a history of unimplemented consents for hotel development in various locations, including the Town Centre in addition to a number of premises which have recently closed. In general, however, all sectors of the hotel market are performing reasonably well. Importantly, a significant driver of demand is taken to be the presence and continued success of London Luton Airport.
- 5.84. The airport is served by excellent public transport connections and also road links and acts as a major economic driver, although it cannot reasonably be expected that all visitors will need or want to use facilities in the Town Centre. Indeed, facilities in other locations (including London) are likely to be marketed as similarly accessible.
- 5.85. The Local Plan therefore supports meeting the needs of hotel accommodation in a range of locations including the Town Centre (Policy LP3) and London Luton Airport / Century Park (LP6). This use is considered compatible in these locations. In addition, hotel accommodation is provided for at Napier Park – reflecting its strong links with the airport but also accessibility to the town centre. This is considered to be a comprehensive and flexible approach and subject to future monitoring has strong prospects to ensure that the needs for hotel accommodation are met over the plan period.

Luton Town Football Club

- 5.86. The potential relocation of Luton Town Football Club (to the Strategic Allocation at Stockwood Park) is a long standing proposal carried forward from the extant local plan. The Club have submitted representations suggesting an alternative town centre location, at Power Court (tied to an alternative form of development on land at Junction 10a south of Stockwood Park). While the Club's proposal for a town centre site may have merit and may be in step with the range of uses envisaged at Power Court, the Council has not had an opportunity to review the potential impact of the proposed scale and nature of the required facilitating development which has not been provided with evidence by the promoters / land owners on land south of Stockwood Park. Therefore, it is not possible to consider altering the allocation of the stadium until more detailed evidence is prepared for consideration by Luton Borough Council.

6. CONCLUSIONS

- 6.1. The approach to Luton Town Centre and Luton's network of District and Neighbourhood Centres as set out in the Submission Local Plan is a fundamental element of the strategy as a whole. It has strong links to the wider objectives of the plan and takes account of the strategic priorities for plan-making. This includes an important contribution to economic development and recognising the role and function of specific centres and Luton's overall role within the conurbation, Housing Market Area and relationship with other surrounding centres. The approach is an important part of setting out the competition and overall balance of land uses within the town and ensuring that they are managed effectively and supported going forward.
- 6.2. The strategy is based on robust evidence to assess the needs for town centre uses – in particular retail (convenience and comparison floorspace). This takes account of national guidance and local context, including the existing pipeline and wider environment for development such as the urban extension North of Houghton Regis. This provides an important understanding of specific places but also the importance of the 'Town Centre First' approach for Luton as a whole. Particularly in relation to comparison floorspace, this approach offers a long-term strategy to increase market share based on a specific focus on development at key opportunity sites within the Town Centre area. The evidence base clearly demonstrates that further out-of-centre development would not be predicated on the same approach to recapturing local expenditure and emphasising the wider benefits and contribution of the town centre to sustainable development. This is tied to a wider framework of policy support for Town Centre diversification to encourage regeneration and improvement in the built environment.
- 6.3. The evidence base and Local Plan as a whole acknowledges this area as one where monitoring patterns of implementation and delivery is crucial and where evidence of need should be updated regularly. This may be influenced by factors outside of the plan area, including the rate of population growth in the logical Retail Study catchment as well as the delivery of existing commitments and identified sites. However, the policy approach as set

out is positive and flexible in terms of providing a range of opportunities to enhance the role of Luton's centres.