

Planning and Transportation

LUTON LOCAL PLAN (2011-31) Overall Approach Background Paper

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 – OVERALL APPROACH

2.1 The Overall Approach Background Paper succinctly tells 'the story' behind the sustainable approach in the Luton Local Plan including the concentration of growth and investment in eight strategic allocations thus setting the context for more detailed explanation in the other Background Papers. The topics covered by the other Background Papers are; Housing, Gypsies and Travellers, Economy & Employment, Centres, Green Belt, Facilitating Growth - Transport and Implementing the Local Plan.

2.2 The submission of the Luton Local Plan represents the culmination of a huge amount of effort overseen by the Council's cross-party Local Plan Working Party. The submission of the Luton Local Plan (2011-31) was agreed by Full Council at its meeting held on 22 March 2016. It comprises the Pre-submission version as agreed by the Council's Executive in September 2015 together with a Schedule of Minor Modifications, the Policies Map including a Town Centre Inset and the accompanying Sustainability Appraisal.

2.3 The Local Plan is important for many reasons although the following four points are particularly noteworthy:

- i. The Local Plan sets out a vision for the future of Luton for the next 15 years, including the scale and distribution of new growth and investment. The plan will have a direct and lasting impact on the quality of life of everyone who lives and/or works in Luton.
- ii. Its policies set the tenor for all development proposals to be judged and these cover a wide range of matters ranging from large-scale strategic investments such as London Luton Airport and Century Park on the one hand to policies that seek to stamp out unacceptable private rentals in garden sheds and small extensions on the other, as well as everything in between including the natural and historic environment, design, transport and retail.
- iii. The Local Plan is different from most policy documents in the sense that it seeks to bring everything together to set out a consistent and integrated vision for the future of the town.
- iv. The Council has taken the initiative to put the plan together but, as the papers summarising the various stages of public consultation demonstrate, it is a plan written for and by the whole community. To reach this point in the plan-making process has involved three extended periods of public consultation.

2.4 It is inevitable that there will be some areas of disagreement. In total 470 representations from 81 Representors were made in response to the consultation on the Pre-submission version of the Local Plan. A summary of the main outstanding issues which are addressed in the Background Papers and the Luton Local Plan 2011-31, Pre Submission Response Summary is as follows:

- Luton's unmet housing need – A number of representations suggest that LBC has not determined how its unmet housing need will be delivered and that this should be resolved before the plan is submitted.
- Luton's housing capacity – The capacity is being queried in several ways, including assumptions within Luton's Strategic Housing Land Availability Assessment (SHLAA) methodology (such as assumptions on windfall sites and densities) and potential alternative use of employment sites / strategic allocations for housing to reduce the housing shortfall.
- The progression of the Luton Local Plan should be delayed until completion of the Joint Growth Options Study.
- Post-2027 growth of London Luton Airport .
- The jobs target is out of sync with the level of housing provision.
- Butterfield Green Technology Park - Pressure to relax restrictions to allow B2 uses in addition to B1 as well as calls for mixed uses, including housing.
- M1 Junction 10A/ Power Court – Luton Town Football Club suggest that a new football club should be located at Power Court in the town centre combined with facilitating retail development at Junction 10A of the M1.
- Green Belt - Suggestions that a Part 2 Green Belt Review should have been carried out.
- East Luton Circular Road Safeguarding – Noting its potential environmental and heritage impacts.
- Retail – Some inconsistencies in the technical evidence base and the owners of the The Mall have indicated they wish to provide a Food Court.
- Gypsies and Travellers – Suggestions that this issue should not be carried out as a separate Part 2 Local Plan.
- Sustainability Appraisal (SA) – Some representations suggest that the SA does not adequately explain how development sites were chosen.

2.5 In relation to the Duty to Co-operate - which is the subject of a separate Duty to Co-operate Statement – Luton Borough Council has used its best endeavours to ensure compliance since its introduction not least because of the reliance on adjoining areas to help meet development needs. While there have been well publicised difficulties in operating the Duty in the sub-region – as indeed in other parts of the country – the Council has achieved a number of substantial positive outcomes for the local planning process as a result of its co-operation with neighbouring authorities. Those outcomes are set out in the Duty to Co-operate statement and some of them are summarised below. It is also pleasing to report that discussions with our neighbours have entered a new and more positive phase. The long anticipated Joint Growth Options Study with Central Bedfordshire Council, Aylesbury Vale District Council and North Hertfordshire District Council is underway with a target date for completion in October 2016. Bi-lateral discussions with neighbouring authorities have proved rewarding and have included discussion on the scope for a series of Statements of Common Ground to be completed in advance of the public examination.

3. THE MAIN ISSUES FOR THIS BACKGROUND PAPER

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

- Critical issues affecting Luton:
 - Characteristics of Luton as a Borough, a built-up area and part of a wider conurbation.
 - Dealing with growth pressures.
 - Building on Luton's economic assets.
 - Meeting peoples' needs.

- Why Luton urgently needs a new local plan.
- The Submission Local Plan
- Delivery
- Working with neighbouring authorities

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

Duty to Co-operate [DTC]

DTC 001 – Duty to Co-operate Statement, April 2016, Luton Borough Council

Vision, objectives and spatial strategy [STR]

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

STR 009 - A healthier future - improving health and wellbeing in Luton 2012 - 2017, Luton Borough Council and Luton Clinical Commissioning Group

STR 010 - Luton's Joint Strategic Needs Assessment 2015 - Luton Borough Council and Luton Clinical Commissioning Group

STR 012 - Luton green belt study - September 2014 - David Hares Landscape Architecture

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

Growing Luton's Economy [ECON]

Housing [HOU]

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

HOU 003c - Luton & Central Bedfordshire strategic housing market assessment 2015 - ORS

Luton town centre and neighbourhood centres [CEN]

Education and community facilities [CF]

High Quality Design [DES]

Natural and historic environment [ENV]

Transport and Communications [TRA]

Climate Change [CC]

Infrastructure delivery and monitoring the local plan [DEL]

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

Other relevant documentation [ORD] – including the extant Luton Local Plan 2001 to 2011 and other documentation relating to the Luton Local Plan 2011 to 31

5. MAIN BODY

Critical Issues affecting Luton

Characteristics of Luton as a Borough, a built-up area and part of a wider conurbation

5.1 Section 2 of the Submitted Local Plan sets out a brief settlement profile and rundown of the key issues and challenges facing the town. There is no need to repeat that analysis here. It is appropriate, however, to highlight some of the key factors that set the context for preparing a new plan for the town.

5.2 Luton’s population in 2011 was c205,000 people and part of a wider conurbation of some c257,000 including Dunstable and Houghton Regis. Luton’s population is known not only to be increasing rapidly but is also increasingly diverse. Perhaps driven by the presence of London Luton Airport there can be no doubt that Luton acts as an engine of growth fuelling population change in the sub region.

5.3 Luton lies 29 miles to the north-north east of London and is strategically located on the M1 motorway and Midland Mainline. Good quality north-south links contrast with relatively poor east-west links, especially for public transport. While London Luton Airport is the smallest of London’s main airports it has significant potential for growth (up to 18 mppa) already in-place, and potential to go higher in the longer term.

5.4 Economically, Luton is an important sub-regional employment centre, a function it has performed since it grew rapidly through development of manufacturing industries. While manufacturing employment has declined in Luton alongside similar trends nationwide it remains an important part of the town’s economic base. More generally Luton’s economy has good prospects for future growth. As a sub-regional employment centre it is inevitable that there will continue to be a complex pattern of commuting. Overall commuting in and out of the town is roughly in-balance but with net in-commuting from authorities lying mainly to the north of the town and net out-commuting southwards towards London.

5.5 The physical scope to accommodate future growth in Luton is limited. Essentially, the outward expansion of the town that has occurred means that almost all of Luton’s administrative area is either already built-up, planned for future development or retained as limited valuable open space/ open land to retain an appropriate balance between developed areas and open land so as to provide a good quality of living.

5.6 The densely built-up nature of Luton is illustrated by its population density. At 2011 this stood at 4,687 people per square km, the third highest ranking English local authority by population density outside of London. Surprisingly one-third of London Boroughs had population densities lower than that in Luton and outside of London, Luton's population density exceeds that to be found in all of the Core Cities and all metropolitan districts. In sub-region around Luton the authorities with the highest population densities are Watford (4,215 people per square km) and Stevenage (3,235 people per square km).

5.7 While the drawing of administrative boundaries plays an important role in influencing population density it is also the case that many large towns and cities have significantly lower population densities. This illustrates how in those - and maybe most - cases the local planning authority is in a much stronger position to directly control its own destiny, by looking at development potential within its own territory.

5.8 In Luton where the administrative boundary and urban edge are often the same there is no such opportunity. This puts added pressure onto what remaining open land exists whether this is designated Green Belt, or not. This analysis also shows how Luton is highly dependent on adjoining authorities to help meet its development needs. The revocation of the former Regional Spatial Strategy has presented a tremendous challenge in many parts of the country but perhaps no more so than in Luton and surrounding areas. This is explored further below and in the Duty to Co-operate Statement.

Dealing with growth pressures

5.9 Planning is about managing the competing interests for the competing uses of land. In an area where the scope for physical growth is constrained this becomes even more difficult and there is a real risk that higher value uses can be allowed to dominate decision-making processes to the detriment of the overall quality of living. The Luton Local Plan is, therefore, about far more than just housing.

5.10 In Luton this is all about striking the right balance by building on our strengths, turning problems into opportunities and protecting the quality and diversity of the urban area by offering protection to lower value uses where this is both appropriate and justifiable including valued employment sites and areas. This statement should not be misinterpreted. The local plan has been designed to be robust and flexible to change and there is a strong record, for example, of genuinely redundant employment sites being released to alternative uses.

5.11 Parts of the evidence base need highlighting at this point.

5.12 The Sustainability Appraisal is important because this sets out the approach to the consideration of all reasonable alternatives during the preparation of the plan. The factors considered have been diverse not only including the scale of growth but also the balance of key uses (such as employment vs residential, town centre vs residential) together with densities and alternative mixes of use on strategic allocations. Section 7 of the Sustainability Appraisal summarises the approach on these matters. In terms of the scale of housing growth proposed within the Local Plan, the Council considers this represents a reasonable, justified and robust target but in order to enable the very latest information to be available to the public examination proposes an update of the SHLAA to be prepared to an April 2016 base date.

5.13 There is little designated Green Belt in Luton. It represents just 3% of the land area much of which is concentrated to the north east of the town at Stopsley. The Council carried out a Part I

Green Belt assessment which concluded that no part of the designated Green Belt should be released at this stage. Neighbouring authorities were invited to participate in a joint Part 2 Green Belt Study which would have enabled cross-boundary land parcels to have been considered but at the time agreement was not reached to enable this to happen. In March 2016, however, Luton BC and Central Bedfordshire have agreed further joint work on Green Belt which will feed into the Joint Growth Options Study. This will be important to establish the extent to which Green Belt which is currently designated Green Belt may be required for development. While this is unlikely to have a major impact on land within Luton it clearly could establish the principle of development on large areas of land beyond the borough boundary, with the scale of 'overspill' requirements and need for location close to the existing urban area providing the exceptional circumstances justifying the changes.

5.14 The level of housing provision is the subject of a separate Background Paper and the evidence behind the definition of the Luton HMA and the scale of the housing requirement will be critical as part of explaining the approach in the plan. At this point, however, it is also important to stress how the quality of life in Luton will be affected by the type and mix of housing that is provided. The need to secure an appropriate level of affordable housing both within Luton and beyond its boundary is just as important an issue as the scale of provision itself.

Building on Luton's economic assets

5.15 Several representations on the Local Plan have suggested that the level of job growth is too high and out of sync with the level of housing growth.

5.16 The Council does not agree with this viewpoint. This is because the overall balance is broadly matched when understanding that the distinction between Luton's administrative area and the wider functional urban conurbation is artificial. The spatial strategy within the plan builds on the spatial relationship of sites to the town centre and a hierarchy of District and Neighbourhood Centres for town centre and mixed use development – locations which can sustain and are encouraged to consider appropriate densities and connectivity by sustainable transport and linked trips to services, leisure and employment. This includes opportunities to link to the Luton guided busway which connects up the conurbation's key town centres east –west (including potentially, urban extensions north of Houghton Regis and potentially north of Luton) and also south to housing and employment sites including London Luton Airport/ Century Park and Napier Park (a mixed use employment and residential development) linking with the Luton Parkway Station. Power Court, a mixed-use housing, commercial and employment development is also close to the main railway station and Luton guided bus interchange. Stockwood Park/ Junction 10a and Butterfield will make provision for Park and Ride and access local services either on or off-site via nearby District and Neighbourhood Centres.

5.17 The Council will continue to work with the other authorities within and adjacent to the wider Luton Housing Market Area to accommodate the unmet needs of Luton and the wider HMA, as sustainably close to where need arises including opportunities to ensure any oversupply of employment land within the HMA is balanced with the need to deliver housing through a Growth Options Study. National policy requires Luton to meet its objectively assessed needs as far as it is sustainable to do so in accordance with the NPPF. The Local Plan sets out a development strategy and growth level which is sustainably within the limits of the town as measured by the evidence base and the sustainability appraisal and secures the sub regional economic role of the town while ensuring that commuting and congestion do not compromise the town's economy and transport network or the health of local communities, including green space, landscape, heritage and environmental habitats.

5.18 In April 2016 the Council launched its new Investment Framework which aims to accelerate investment into Luton. This document promotes investment and development on the eight strategic allocations designated in the local plan including the recently designated Enterprise Zone at London Luton Airport.

Meeting peoples' needs - the special characteristics of Luton's population

5.19 It may seem an obvious point but the Local Plan needs to help facilitate investment and development by the private, public and third sector to meet the needs of the people of Luton.

5.20 This is where the local plan integrates with a range of strategies and services across the Council and its partners to meet the complex needs within the town. These linkages are summarised in Section 1 of the Local Plan and include the Council's Corporate Plan, its Health and Wellbeing Strategy and Joint Strategic Needs Assessment. Appendix 1 of this Background Paper includes the Luton Borough Profile from the 2011 Census which provides a ready comparison of key characteristics of the people of Luton compared to regional and national averages.

5.21 At a time when public sector budgets are hard pressed it is particularly important that all services are integrated as effectively as possible supporting the Council's corporate mission statement, 'the needs of Luton's people will be first in everything we do'.

Why Luton urgently needs a new local plan

5.22 Luton's existing local plan is out of date. It was adopted nearly 10 years ago and covered the period up to 2011. A new plan is needed to give a 15 year time horizon and provide an up-to-date basis for all development management decisions and to both encourage and steer investment in the town.

5.23 The Council recognise that difficulties in implementing the Duty to Co-operate in the sub-region means that some issues will not be completely resolved. In particular, there is still a need to ensure and demonstrate that full extent of development needs arising in Luton can be accommodated through local plans in neighbouring areas. The Joint Growth Options Study in particular should provide the basis on which these matters can be resolved.

5.24 The Council does not accept there should be a delay to the Local Plan until the necessary technical work and agreements are in-place, however, since to do so would; (i) leave Luton having to operate an out-of-date (and hence weakened) plan in relation to important development decisions; (ii) require the plan period of the submitted plan to be extended, (iii) require a consequential need for all of the key (and currently up-to-date) background technical evidence to be refreshed to the later end-date with all the delay and expense this would incur, and (iv) result in Luton failing to meet the Government target for local plans to be in-place.

5.25 The Council recognises there is some risk in this approach, in the sense that the Luton Local Plan *might* need some elements to be the subject of a review, but considers this to be the most sensible and sound way to move forward not only for itself, but also for neighbouring local authorities too, with safeguards to ensure this will happen built into local plans and monitoring procedures, as necessary.

The Submission Local Plan

5.26 The Luton Local Plan (2011 - 2031) together with the Joint Minerals and Waste Local Plan will form the statutory development plan covering the whole of Luton's administrative area. In this

section there is an explanation behind the structure of the Local Plan. In addition to the Local Plan and Joint Minerals and Waste Local Plan there are just six additional adopted Supplementary Planning Documents (SPD) in Luton. Two of these are area-based relating to the High Town. A new draft SPD for High Town has recently been published for public consultation.

5.27 The Introduction and Background to the Local Plan sets out the procedural context for the plan-making process including the stages undertaken to reach this point in the process together with reference to the national policy and partnership working in the wider sub-region especially with the South-East Midlands Local Enterprise Partnership (SEMLEP), neighbouring local authorities and the full range of Duty to Co-operate prescribed bodies. This part of the plan also sets out how the Local Plan integrates with other Council services and strategies and how the Local Plan relates to the Evidence Base, the Sustainability Appraisal and Council's Integrated Impact Assessment.

5.28 Section 2 is entitled 'Setting the Scene' and this comprises a rundown of the issues and challenges facing the town.

5.29 Section 3 of the plan is critical since this articulates the vision for the future of the town in its wider setting before setting out 11 Strategic Objectives through which the vision will be delivered.

5.30 The Spatial Strategy forms Section 4 and sets out the Presumption in Favour of Sustainable Development as the first policy. This sets the tone for the rest of the plan. The second policy – the Spatial Development Strategy – then 'sets out the stall' in terms of the overall scale of development and pattern of growth required for both housing and employment including the concentration of change into eight strategic allocations across the town, two of which are within the town centre. These strategic allocations include a mix of developments ranging from use of limited remaining greenfield sites to large-scale regeneration and renewal. This part of the plan also explains how there is a shortfall in capacity to accommodate all of the housing growth arising in the town. This policy also refers to the focus of new investment in the town centre and district and neighbourhood centres as well flagging the key infrastructure requirements. This section then goes on to include specific policies for the town centre, Green Belt and then each of the strategic allocations. A Key Diagram is used to visualise the overall pattern of growth as well as provide an indication of the potential future directions of growth to be examined through the Joint Growth Options Study.

5.31 Following on from the Spatial Strategy there are sections that deal topic-by-topic with the Economy (Section 5), Housing (Section 6), detailed policies on Centres (Section 7), Education and Community Facilities (Section 8), High Quality Design (Section 9), the Natural and Built Environment (Section 10), Transportation, Communications and Climate Change (Section 11) and finally Infrastructure Delivery and Monitoring in Section 11. A series of Appendices cover some important elements of the plan for Development Management purposes including parking and cycling standards, the categorization of employment sites, a listing of the housing allocations, the housing trajectory and space standards, travel assessments and travel plans, greenspace standards and the Green Infrastructure Network.

5.32 Following the period of public consultation carried out on the Pre submission version of the Local Plan the Council has agreed a series of Minor Modifications it proposes to make to the plan. The sources of the Minor Modifications are set out in the schedule but arise from principally from two sources: (1) those consequential from representations made on the Pre-submission version of the plan which add clarity or update the plan and (2) those generated within the Council which largely relate to typographical or other factual updates. The Sustainability Appraisal was updated in March 2016 to take account of the representations made as well as to consider the Minor Modifications.

Delivery

5.33 While the preparation of a local plan is a considerable task in itself it is the effectiveness of delivery of the growth and investment that is of paramount importance. A separate Background Paper covering this topic has been prepared but it is appropriate to refer to the following key points.

5.34 As highlighted in para 5.18 the Council's Investment Framework which was launched in April 2016 provides the promotional dimension or 'shop window' to attract inward investment to take advantage of the opportunities for growth identified in the local plan. The local plan is also supported by the Infrastructure Delivery Plan (IDP) which identifies (as far as possible) the critical and other infrastructure necessary to support the delivery of the objectives, spatial development strategy and other policies set-out in the plan.

5.35 The IDP also provides an overarching framework for service providers' plans and programmes, bringing them into one place. This should help all providers to plan for the predicted level and locations of future growth as set out in the local plan.

5.36 A further function of this document is to support the development of a Community Infrastructure Levy (CIL) or other mechanisms that secure funds for infrastructure delivery. It can also help to identify priorities and support funding bids to bodies such as the local enterprise partnership.

5.37 The infrastructure delivery plan (IDP) will be regularly updated to provide the latest position on infrastructure delivery. In this sense it should be seen as a 'live' document.

5.38 In 2014 Luton Borough Council decided not to proceed with the implementation of a CIL charging schedule because of concerns over the viability of development and a desire to support the provision of affordable housing. At the same time additional work in relation to housing suggested there was insufficient viability to support a charge on small housing developments. These decisions were taken in the immediate period following the economic downturn.

5.39 More recently the work on the viability of charging on small (i.e. less than 10 dwellings) housing developments has been updated. This suggests that the underlying position on development viability has improved to the extent that the Council has resolved to bring forward proposals for such a charge on qualifying sites. It has also prompted the Council to review its position in relation to CIL with further work on viability having recently been commissioned. In due course this may result in a Charging Schedule being brought forward. Progress on both these initiatives will be made once the position on starter homes has been clarified.

5.40 In relation to housing the Council has embarked on a new initiative to establish a new Housing Market Partnership (HMP). The HMP enables a collaborative approach to the planning and delivery of housing in the Borough with the opportunity for a range of organisations with housing expertise and interests to provide input and advice to the development of Luton Borough Council's housing policies, strategies and evidence base such as the Strategic Housing Land Availability Assessment and viability evidence. In particular, the HMP will provide comments and advice on market conditions, site viability and general critiquing of draft documents. The initial meeting of the HMP took place in December 2015 and it is envisaged that the partnership will meet twice-yearly, or more frequently as required.

Working with neighbouring authorities

5.41 The Duty to Co-operate Statement sets out in detail the considerable effort placed on this topic by Luton Borough Council. This has involved joint working on joint technical studies including the establishment of an agreed definition of the Luton Housing Market Area and the agreed level of objectively assessed housing needs (OAHN) for both Luton and the wider HMA in the period up to 2031.

5.42 There have been extensive discussions for sustainable urban extensions on the edge of Luton to the north-west, north and east of the town although it is still recognised that further work is required to fully test and assess all the growth options.

5.43 Luton Borough Council has and continues to work diligently with neighbouring authorities on a bi-lateral basis and through its representations on emerging development plans with the objective of ensuring that all relevant cross-boundary are properly addressed.

5.44 In 2012, shortly after the introduction of the Duty to Co-operate Luton Borough Council withdrew from the joint planning arrangement with Central Bedfordshire Council because of concerns that full consideration of some realistic options and infrastructure implications arising from the growth on the edge of Luton were being prematurely discounted.

5.45 This situation helped contribute to a failure of the Central Bedfordshire Local Plan under the Duty to Co-operate, despite efforts by Luton to continue to seek co-operation from neighbours, and the resultant hiatus meant that discussions in 2014 and throughout 2015 did not progress as fully as they might.

5.46 Revocation of the Regional Spatial Strategy in January 2013 compounded the position and presented Luton and the neighbouring sub region with a very challenging position given the scale of growth required and in particular the very tightly drawn boundary around Luton.

5.47 While on reflection this sequence of events was regrettable, the sub region is very complex and the growth pressures considerable. The removal of the regional planning tier and advent of localism has left the sub-region without any overarching structure within which governance over high level cross boundary strategic decision-making can take place. Luton Borough Council took the approach it did at the time because its growth needs were quite simply not being properly addressed.

5.48 Against this difficult context Luton Borough Council has been making its best endeavours to ensure that the Duty to Co-operate is complied with and seeking to ensure that joint technical studies inform the appropriate level and distribution of housing growth are taken forward so that all local planning authorities in the sub-region are able to progress local plans to adoption. Following the withdrawal of the Central Bedfordshire Development Strategy in late 2015 there has been an opportunity to reinvigorate discussions under the Duty to Co-operate and further substantial co-operation between Luton and Central Bedfordshire has led to agreement, in March 2016, on the brief and the commissioning of the Joint Growth Options Study from Land Use Consultants. In addition Central Bedfordshire and Luton Borough Council have also agreed to carry out joint work on Green Belt.

5.49 In these circumstances Luton Borough Council had little choice but to progress its local plan. While completion of the Joint Growth Options Study remains outstanding the Council is confident that the early adoption of its local plan would provide a degree of certainty within the sub region thus enabling and encouraging completion not only of the joint work but allowing work on the other local plans to proceed. In the event that the Joint Growth Options Study led to an outcome - such as a higher level of growth to be accommodated within Luton Borough - then this can either be achieved

through modifications prior to adoption or, failing that, through a review of relevant parts of the plan.

5.50 Given the tightly drawn nature of boundaries of Luton the scope for radical change to the approach in the Local Plan is limited. Luton Borough Council is content that the scale of growth proposed in its Local Plan is set at a challenging level and that level of objectively assessed housing need for the Luton HMA and certainly that element attributable to Luton (i.e. 17,800 dwellings) must be met either within Luton or in locations which are either adjacent to the north, east and west of the existing built-up area or, failing that, in locations which are easily accessible by public transport to the town. Subject to the outcome of Joint Growth Options Study this not only includes Central Bedfordshire but potentially, also includes locations in North Hertfordshire and Aylesbury Vale.

5.51 In a spirit of co-operation Luton Borough Council recognises that it is desirable that all local planning authorities in the sub-region should make rapid progress on their local plans and that subject to active participation in the Joint Growth Option Study and a commitment to take forward the outcomes, if appropriate to their areas in a review of their local plan, then it will support early completion of local plans.

5.52 It is intended that this position should be 'locked in' by seeking agreement on Statements of Common Ground between Luton Borough Council and the other local planning authorities in the Luton HMA.

5.53 A separate Duty to Co-operate Statement has been prepared which includes the detail and documentation to fully set out the nature of cross boundary working in the sub region.

6. CONCLUDING REMARKS

6.1 Luton Borough Council attaches great importance to its local plan. While the Council has led its preparation three periods of public consultation have helped refine the plan so that it is truly representative of the aspirations of Luton's people. It commends the plan as sound and legally compliant, and one which sets out a vision and approach which will meet the needs of the town over the coming 15 years.

6.2 In light of its administrative geography the Council, probably far more than most local authorities, attaches great significance to the Duty to Co-operate and the cross-boundary implications of growth and development matters. Looked at as a whole, there is strong evidence of continuing and positive efforts at engagement with neighbouring authorities, which has delivered effective outcomes in a number of areas of direct relevance to the local plan. Such co-operation, inevitably and properly, continues for example by the further commissioning of joint technical work. The Council are hopeful that this situation, with the support of Planning Inspectors will lead to all local planning authorities within the sub-region moving rapidly to adopt their local plans.